



LEE VALLEY REGIONAL PARK AUTHORITY

**REGENERATION AND PLANNING
COMMITTEE**

17 JANUARY 2019 AT 12.00

Agenda Item No:

5

Report No:

RP/25/19

**LEE VALLEY REGIONAL PARK ACT 1966 SECTION 14
PARK DEVELOPMENT FRAMEWORK
PROPOSED DRAFT STRATEGIC POLICIES**

Presented by the Head of Planning and Strategic Partnerships

SUMMARY

The Regeneration and Planning Committee agreed a range of draft documents for consultation on the Park Development Framework in March 2018 (RP/18/18). These documents included Strategic Policies, supporting Evidence Base, Strategic Environmental Assessment and a Habitats Regulations Assessment.

The Authority consulted a total of 340 key stakeholders, organisations and individuals on these draft documents for 6 weeks between 18 April and 30 May 2018. 19 detailed responses were received totalling 198 individual responses.

Reports on the outcome of the consultation completed at the same time on the draft landscape strategy and draft Area Proposals for Areas 6, 7 and 8 of the Regional Park are included in other Papers included on the Agenda of this meeting.

A considerable number of changes have been made to the draft policies resulting from external comments, particularly from Natural England, but also prompted by officers to clarify and further refine wording. Other small drafting changes were made to the other documents as well. These were agreed by the Park Development Framework (PDF) Panel on 15th November 2018 (PDF/25/18).

Appendix A to this report is the Lee Valley Regional Park Strategic Planning Evidence and Policies document which includes the full suite of strategic planning aims and draft policies shown with strike through and with the revisions shown in red bold text. A 'clean' copy is included at Appendix B to this report. Members are asked to consider the proposed changes and whether there are any further changes required, other issues or spatial implications that need to be addressed or whether additional policy objectives are required. Appendix C to this report sets out all the responses to the consultation with the proposed response approved by the Panel identified in each case. Appendices D and E are available on the Committee website: Available on Committee website: <http://www.leevalleypark.org.uk/en/content/cms/corporate/about-us/meeting-documents/regeneration-planning-committee/> and include the draft Strategic

Environmental Assessment, Habitats Regulations and Appropriate Assessment. The Evidence Base document is also available on the committee webpage:

<http://www.leevalleypark.org.uk/en/content/cms/corporate/about-us/meeting-documents/regeneration-planning-committee/>

The draft policies have been the subject to the Habitats Regulations Assessment including Appropriate Assessment. Final conclusions from Natural England are still awaited on this process and it is anticipated that these will be presented orally to the meeting.

Once the draft amendments to all of the documents included in the Papers on this agenda are agreed the intention is to present to the Authority meeting in April 2019 for adoption. They will then replace the adopted Park Plan (Part 1 and 2 (2000) and the PDF Thematic Proposals (2011).

RECOMMENDATIONS

- Members Approve:
- (1) the revised draft strategic policies (attached as Appendices A and B to this report), amendments to the Evidence Base and the Strategic Environmental Assessment, Habitats Regulations Assessment as set out in the consultee response spreadsheet (attached as Appendix C to this report) and their referral to the Authority meeting in April 2019; and
 - (2) in the event that comments are not received from Natural England on the Appropriate Assessment by the date of this meeting delegation to the Head of Planning and Strategic Partnerships to make amendments to the draft strategic policies and evidence base taking into account comments from both Natural England and Members.

BACKGROUND

- 1 To satisfy the requirements of section 14 of the Lee Valley Regional Park Act 1966 (the Act) and replace the Park Plan (2000) the Authority has embarked on a process of producing detailed location specific proposals for all land within the Park as part of the Park Development Framework (PDF). This is being undertaken through a phased process and proposals for the southern half of the Park from East India Dock Basin, Area 1 to Rammey Marsh and Area 5 have now been adopted. Draft proposals for the remainder of the Regional Park from Waltham Abbey north to Ware, Areas 6, 7 and 8 have been through two rounds of public consultation and revised to take account of the comments made (PDF Panel, 12 October 2018, Paper PDF/23/18).
- 2 Following Counsel's advice, it was agreed that the Policies of the Park Plan required updating to reflect the changing context of the Regional Park and to accommodate the Authority's adopted Corporate Land & Property Strategy. In line with the Authority's statutory duty as a public body the strategic policies are required to be covered by a Strategic Environmental Assessment. On the advice of Natural England, a Habitat Regulations Assessment (HRA) screening process has also been undertaken for the Strategic Policies. The Policies constitute a

'plan' for the purposes of the Regulations (the Conservation of Habitats and Species Regulations 2010) which outlines priorities that could affect the integrity of European Sites including the Lee Valley Special Protection Area.

- 3 Linked to this work, officers commissioned a new Landscape Strategy, the details of which were agreed at this Committee in March 2018 (RP/17/18) The outcome of public consultation on this document is included in the agenda of this meeting.
- 4 A detailed evidence base was included in the consultation but as no major comments were received on this it has not been included for further comment on this agenda. It is available via the Committee web page via the committee web page:<http://www.leevalleypark.org.uk/en/content/cms/corporate/about-us/meeting-documents/regeneration-planning-committee/>.
- 5 The development of the Authority's strategic policies is also being assessed by way of a Strategic Environmental Assessment (SEA) in line with the Environmental Assessment of Plans and Programmes Regulations 2004. A Scoping Report was produced for consultation which sets the context, establishes a baseline and sets out strategic environmental objectives against which to test the likely environmental effects of the new policy options.
- 6 During September and October 2017 a 'Consultation Report' containing a first draft of the strategic policies, together with the SEA Scoping Report and draft Evidence Base underwent an informal consultation process with key riparian and statutory stakeholders in order to help formulate the draft strategic policies, and the outcome of this was discussed at PDF Panel in November 2017 (Paper PDF/21/17). The formal public consultation on the revised Strategic Policies, evidence base, SEA Scoping Report and HRA Screening Report took place during April and May 2018.

SCOPE OF CONSULTATION

- 7 A six week public consultation on the revised Strategic Policies and supporting documentation took place between 18 April 2018 and 30 May 2018. This ran alongside the second round of consultation on the PDF Area Proposals for the northern half of the Park (Areas 6, 7 and 8) and consultation on the Landscape Strategy. Key stakeholders, riparian authorities, organisations and individuals, most of which had been previously involved in PDF consultations were contacted. The consultation was publicised on the Authority's corporate and Regional Park's Visit Lee Valley websites and letters were again hand delivered to individual addresses at Wharf Road.
- 8 All the documents were placed on a dedicated web page and paper copies of all documentation was lodged at the Authority's key venues: Myddelton House Visitors Centre, Lee Valley Park Farms, Lee Valley White Water Centre, Pickett's Lock at the Lee Valley Athletic Centre, Lee Valley Ice Centre and Lee Valley VeloPark. Over 340 organisations/individuals were directly invited to comment by email.

OUTCOME OF CONSULTATION ON STRATEGIC POLICIES AND RELATED DOCUMENTS

- 9 Responses to the draft Strategic Policies were received from 19 organisations and individuals which when examined generated 198 separate comments. Most

relate to the draft strategic policy document and a few require amendments to the Evidence Base. Natural England raised particular concerns in respect of the HRA Screening report and these are covered in a separate section below. A number of minor edits have also been identified to update the text and correct errors. Key areas of proposed change are highlighted below.

- 10 **Riparian authorities – tall buildings, landscape, well-being and inclusivity**
Both Hertfordshire and Essex County Councils responded to the Strategic Policy consultation as did Epping Forest District Council and the London Boroughs of Enfield, Hackney and Tower Hamlets. There was general support for many of the draft policies and the key challenges and opportunities described.
- 11 Essex County Council and Epping Forest District Council are particularly supportive of policy that will encourage visitors and tourism to their District/County and policy that protects biodiversity and heritage but are concerned to ensure policy does not stifle the viability and vitality of commercial uses in the Park, particularly the development of glasshouses. Epping Forest District Council identifies Landscape related Policies L5 – resisting the impact of tall buildings and L6 – protecting views as a potential issue for the glasshouse industry as modern glasshouse development is tall and will impact upon views (P LA3.8).
- 12 Similarly, the London Borough of Enfield are very supportive of policy on improving access (A1- A5), increasing attractiveness and enhancement of water spaces (W1 and W2) and the effective use and management of land (E1) but are concerned that policy L5 could constrain higher density and taller development in or close to the Park area (P LA6.0 to 6.1). In response the Authority has explained that Policies L5 and L6 apply across the whole of the Park and are informed by the Landscape Character Assessment. This defines the Park as having distinct qualities that differentiate it from the surrounding urban fabric. It is these qualities that these policies seek to protect.
- 13 The Authority recognises the challenges facing local authorities in meeting significant housing and regeneration growth, particularly those within the Upper Lee Valley Opportunity Area. Tall residential buildings adjacent to the Regional Park gain an added 'value' or benefit from their proximity to and the views out over the Regional Park. However, these views out across the valley, the openness of the Park, the visual connectiveness of open and green spaces are the key to the Park's attractiveness and underpin its enjoyment by people contributing to their 'wellbeing', whether they visit for active sport, informal recreation or are just passing through. Whilst tall buildings can obstruct views and alter perceptions of the proximity of the Park they need to be evaluated against landscape and visual assessments. The wording has been altered to be less dogmatic and more 'considered' to reflect how such planning applications are evaluated.
- 14 Hertfordshire County Council support the Landscape policies L1 to L7 and policy aimed at conserving and enhancing heritage assets H1- H3. They also seek a commitment in policy to achieving sustainable development in the Park. A new policy numbered as D2 has been added to address this point. A minor amendment has also been made to Policy H1 referring to historic environment to widen the scope of the policy and address in part Hertfordshire County Council's concerns about hidden or unknown heritage assets. The Authority does not have the expertise or resources to identify unknown heritage assets.

- 15 Both the London Boroughs of Hackney and Tower Hamlets are supportive of policy seeking to improve accessibility, protect openness and landscape character and policy to develop sporting uses and appropriate visitor facilities. They have also suggested the need for policy to be more specific in terms of health and well-being and inclusivity. These points are relevant, particularly given the work the Authority is already doing through its Community Access Fund and its diverse events programme. Amendments are therefore proposed to address these points.
- 16 **Achieving a net gain in biodiversity and Natural Capital**
A number of respondents have raised issues relating to draft policy aimed at conserving and enhancing the Park's biodiversity and the need to achieve a net gain in biodiversity. The London Borough of Tower Hamlets seek to strengthen the policy in order to better resist schemes that have an adverse biodiversity impact on the Park. Herts & Middlesex Wildlife Trust (HMWT) have suggested amendments to make the policy more effective and have identified the DEFRA biodiversity offsetting metric as the best mechanism for measuring net gain in an objective and consistent way. HMWT point out that several local planning authorities in Hertfordshire have included reference to the metric in their Local Plans, including East Herts and Broxbourne and it would therefore be entirely consistent with these documents if the Park Authority were to do the same. These reference the Environment Bank version as their calculator of choice. The recently adopted National Planning Policy Framework (NPPF) July 2018 and DEFRA's 25 year vision also refer to 'measurable net gain in biodiversity', further reinforcing the need for objective, measurable, and consistent evaluation, not the subjective situation we have now.
- 17 The London Borough of Enfield are interested in the related issue included in the draft policies of Natural Capital Accounting whereby any proposals falling within the Lee Valley Regional Park Authority boundary that would result in the loss or reconfiguration of any open land would need to make use of Natural Capital Accounting methods. They consider this approach to be in line with the emerging Draft London Plan and are interested to see how in practice this policy is applied, particularly given the Lee Valley Regional Park is either designated Green Belt or Metropolitan Open Land.
- 18 The Authority is feeling its way with the concept of Natural Capital Accounting and in achieving net gains in biodiversity. Implementation will require further discussion with stakeholders and the riparian planning authorities given this reflects a new approach of understanding the intrinsic value of the natural environment. Policies have been reorganised to separate natural capital (which is wider than just biodiversity) from reference to net gain in biodiversity, please refer to E1 and B1 in the revised draft policies.
- 19 Natural England have advised amendments to policy B5 to provide greater clarity as well as including other forms of avoidance and mitigation strategies to reduce potential impacts on sensitive habitats and species. Given the other comments suggested above draft policies have been substantially amended.
- 20 **Flood Risk**
A new aim and draft policies have been added in response to comments made by the Environment Agency (EA) about flood risk, flood management and climate change (P OA 10.5 – 10.8). These are issues raised as part of the 'key challenges' section in the draft Strategic Policies document and under Objective 12 of the Strategic Environmental Assessment which seeks "to reduce the risk

of flooding to people and promote the sustainable management of flood risk". It is important that the aims and amendments are now included as advised by the Agency.

21 Moorings

The Canal & River Trust (C&RT) expressed disappointment at the lack of policy on moorings and in particular residential moorings. C&RT suggest that the provision of appropriate managed sites within the Park boundary could be an appropriate means of securing wider improvements to the Park consistent with the Authority's statutory functions, similar to the opportunities presented by land based residential development (P OA9.5). No change is proposed in response.

- 22 The C&RT's draft London Mooring Strategy was considered by the Authority's Executive Committee in December 2017 (Paper E/534/17). Whilst the importance of developing a mooring strategy was acknowledged, the need for a tailored approach within the Park was also identified, one that could address both its role for leisure and recreation, and the need to protect and enhance the biodiversity function of the waterways. Further detail was requested and is awaited. The PDF aims, objectives and the draft Policies seek to balance the competing needs on the waterways.

23 Other Comments

Transport for London, both the Commercial Development team and the Spatial Planning and Crossrail 2 team, have responded to the consultation. This has resulted in some updates and corrections to the supporting text in the policy document including a reference to 'good growth' under para 2.50, please refer to P OA15.4

- 24 Comments made by Sport England have led to a revision to Policy V3 to ensure an explicit reference to sports provision. Minor changes to cover Conservation Areas and amendments to Policy H1 have been made to address concerns raised by Historic England.

OUTCOME OF HABITATS REGULATIONS ASSESSMENT AND NATURAL ENGLAND ADVICE

- 25 Officers have been liaising with Natural England over the findings of the Habitats Regulations Assessment (HRA) Screening Report that accompanies the draft Strategic Policies. Its response is included in the spreadsheet, ref P OA13.9 – OA13.17.
- 26 The purpose of the HRA is to consider whether the draft Strategic Policies are likely to have an impact or 'Likely significant effect' – LSE on the conservation objectives of European sites designated under the Habitats and Birds Directive, either on their own or in combination with other plans and projects. The European sites screened in to this assessment process are the Lee Valley Special Protection Area (SPA) and the nearby Epping Forest Special Area of Conservation (SAC). The HRA process identifies the pressures and threats to which these sites are vulnerable and which could potentially be influenced by the Strategic Policies. Two threats are identified; public access and associated disturbance in respect of the Lee Valley SPA and air pollution in relation to the Epping Forest.
- 27 Public access and associated disturbance has been identified as a threat to the conservation objectives of the Lee Valley SPA mainly due to an increase in

visitors i.e. at popular destinations such as the River Lee Country Park and the associated recreational pressures they create, e.g. with more people walking, including dog walking, angling, boating, running, etc. The draft policies were written to try and balance the need to improve access and recreational opportunities whilst also protecting the more sensitive sites and habitats and encouraging people to use public transport to reach the Park. More detail on the protection, access and management of sensitive sites is also included in the Area Proposals. The in-combination effect was also considered; any increase in visitors to the Park caused by the draft policies will be in-combination with increases in visitors caused by growth in riparian authorities i.e. from new developments. The HRA recognises however that the draft policies address this point. Policies D1 and D3 promote partnership working with the riparian authorities with a view to protecting sensitive natural assets such as landscape and biodiversity.

- 28 The HRA Screening Report recognised both the partnership approach and the balancing process set out in policy and ruled out an LSE on the Lee Valley SPA. Natural England are in agreement with these findings (please refer to P. OA13.9 – 13.5) and acknowledge the positive track record of conservation management undertaken by the Authority for the benefit of the Lee Valley SPA.
- 29 However, both the HRA Screening and Natural England identify that an LSE on Epping Forest SAC, caused by air pollution, which could result from the delivery of the strategic policies in-combination with the other Local Plans in the riparian and neighbouring authorities cannot be objectively ruled out at this stage. To address this issue many of the surrounding local planning authorities are seeking to develop a joint Mitigation Strategy. However, at this time nothing has been drafted for consideration.
- 30 As a result of the HRA's recommendations the Authority commissioned further work requiring the completion of a further stage of the HRA, an Appropriate Assessment (AA). This did not conclusively state that implementation of the Authority's draft strategic policies would result in adverse impacts on air quality affecting the Epping Forest SAC. To mitigate any possibility of this occurring officers have included in the current draft a stronger commitment in Policy A4 which stresses the importance of sustainable transport modes to access the Regional Park to limit the possibility of increases in air pollution arising from visitors to the Regional Park. The AA report concluded that the Authority should maintain a watching brief on the development of the Mitigation Strategy with the aim of providing support when this finally emerges.

OUTCOME OF PANEL MEETING

- 31 Following consideration of the report on the Strategic Policies the Panel agreed to officer suggestions to draft Policies B2, V2 and V3. A request was made for inclusion of an Executive Summary to the whole document and this is being drafted. Changes to the policies are included in the current draft.

NEXT STEPS

- 32 In the event that the Committee is supportive of the proposed changes suggested in this report, it is intended to report the draft policies, landscape strategy and Area Proposals to the full Authority meeting in April 2019 for adoption.

ENVIRONMENTAL IMPLICATIONS

- 33 Environmental implications have been addressed in the draft strategic policies, and SEA documents.

FINANCIAL IMPLICATIONS

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

LEGAL IMPLICATIONS

- 35 Section 14(1) of the Lee Valley Regional Park Act 1966 requires the Authority to prepare a plan setting out proposals for the future management and development of the Regional Park. The strategic policies form part of the PDF and once adopted will replace the Park Plan's (Part 1) strategic policies for the Park.
- 36 The Authority has a legal requirement under Section 14(1) of the Lee Valley Park Act to consult with the local planning authorities and any appropriate statutory bodies. The Authority during the process of revising the Section 14(1) plan proposals agreed to extend this to include as many Stakeholders as possible. This has enabled it to consider a wider range of views and responses received before making any decisions on revisions to its draft proposals.

RISK MANAGEMENT IMPLICATIONS

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

EQUALITY IMPLICATIONS

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

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PREVIOUS COMMITTEE REPORTS

Regeneration & Planning Committee	22/03/18	PDF Review of Strategic Policies	RP/18/18
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APPENDICES ATTACHED

Appendix A	Strategic Planning Policies and Evidence Base document with track changes
Appendix B	'Clean' copy of Strategic Policies
Appendix C	Schedule of Comments received and officer responses
Appendix D	Available on Committee website: http://www.leevalleypark.org.uk/en/content/cms/corporate/about-us/meeting-documents/regeneration-planning-committee/
Appendix E	Available on Committee website: http://www.leevalleypark.org.uk/en/content/cms/corporate/about-us/meeting-documents/regeneration-planning-committee/

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LIST OF ABBREVIATIONS

HMWT	Herts & Middlesex Wildlife Trust
SSSI	Site of Special Scientific Interest
HRA	Habitat Regulations Assessment
SEA	Strategic Environment Assessment
LSE	Likely Significant Effect
SPA	Special Protection Area
SAC	Special Area of Conservation
NPPF	National Planning Policy Framework
C&RT	Canal and River Trust
ESSA	Enfield Scout Sailing Club
EA	Environment Agency
EH	English Heritage
PDF	Park Development Framework
NE	Natural England
BAP	Biodiversity Action Plan
EFDC	Epping Forest District Council
EHDC	East Herts District Council
BBC	Broxbourne Borough Council
HCC	Hertfordshire County Council
ECC	Essex County Council
NIA	Nature Improvement Area
LA	Local Authority
OA	Organisations and agencies
LB	Landowners and businesses
SR	Sport and Recreation interests
GI	Groups Individuals
Rep	Representation
AA	Appropriate Assessment

LUC

www.lucplanning.co.uk

Lee Valley Regional Park Strategic Planning Evidence and Policies

Lee Valley Regional Park

Park Plan: Part 1 Strategic Policies
Prepared by LUC
February ~~December~~ 2018

Project Title: Part Plan Part 1 Strategic Policies

Client: Lee Valley Regional Park Authority

Version	Date	Version Details	Prepared by	Checked by	Approved by
1	11/12/2017	Draft	Philip Smith Calum McCulloch	Josh Allen	
2	15/02/2018	Final Version for Authority sign-off	Josh Allen Philip Smith	Josh Allen	Philip Smith



www.landuse.co.uk

Lee Valley Regional Park Strategic Planning Evidence and Policies

Lee Valley Regional Park

Park Plan: Part 1 Strategic Policies
Prepared by LUC
~~February~~ **December** 2018

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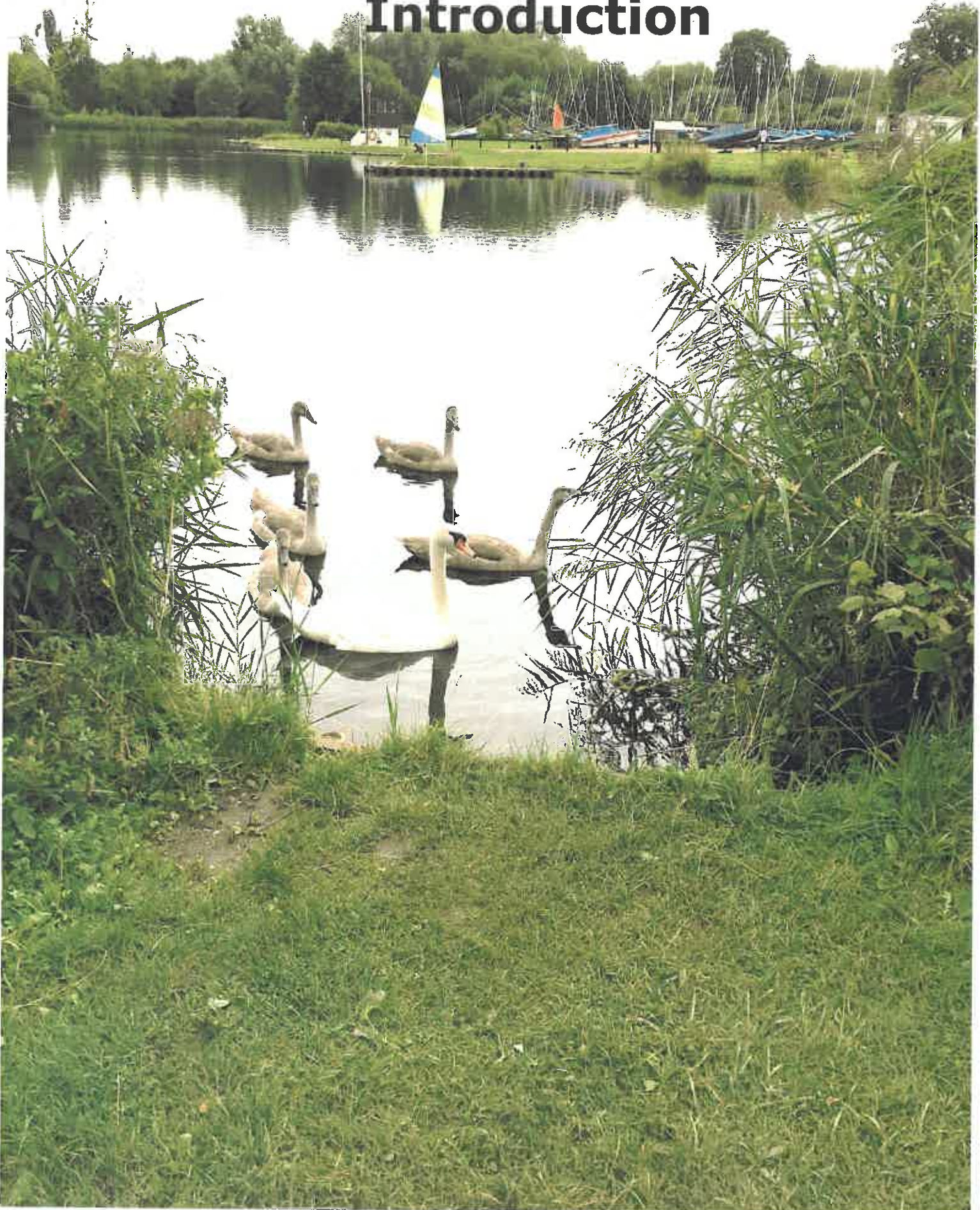
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1 Introduction



1 Introduction

Role and purpose of the Strategic Policies

- 1.1 The Lee Valley Regional Park and the Lee Valley Regional Park Authority were created in 1967 through the Lee Valley Regional Park Act 1966. The Act sets out the duty of the Authority to “develop, improve, preserve and manage the park as a place for the occupation of leisure, recreation, sport, games or amusements....for the provision of nature reserves and for the provision and enjoyment of entertainment of any kind” (Section 12 (1)).
- 1.2 **Over the last fifty years the Regional Park has developed as a World Class visitor destination recognised for its international and national events and for its eight Sites of Special Scientific Interest, Ramsar and Special Protection Area.**
- 1.3 The current Lee Valley Regional Park Plan was adopted in April 2000. It consists of two parts:
 - Part one: Strategic Policy Framework outlines the policies and objectives for the Regional Park, providing the strategic policy framework for its future use and development.
 - Part two: Consists of particular proposals for the future use and development of individual sites and areas that collectively form the totality of the Regional Park.
- 1.4 The Authority is also preparing Area Proposals for the future use and development of individual sites and areas that collectively form the totality of the Regional Park. Area Proposals have been adopted by the Authority for five areas; proposals for Areas 6, 7, and 8 have yet to be adopted.
- 1.5 The new Strategic Policies replace those included in Part One of the Park Plan (2000). The Authority will apply the policies to guide development and land use change within and adjacent to the Park in collaboration with the Riparian Authorities. The policies will therefore provide greater certainty for developers and landowners and help the LVRPA in its role as a statutory consultee on development plans and planning applications. The policies will also inform the Park’s own Area Proposals and any development within or outside these areas put forward by the Authority itself.

Strategic context

- 1.6 The predicted **increase in London’s and the wider region’s population**, will pose significant challenges, as well as bringing opportunities, for the Park.
- 1.7 There have been **significant contextual changes within and around the Park** since the current Park Plan was adopted in 2000. These include the London 2012 Olympics and its legacy, the GLA’s Opportunity Area Planning Frameworks for Upper and Lower Lee Valley, the GLA’s Housing Zones, Crossrail 1 and plans for Crossrail 2.
- 1.8 Recent years have also seen **increased emphasis on the importance of the ‘resilient city’, in the face of climate change, and the strategic role of green infrastructure in this regard**. This suggests renewed identification with Professor Sir Patrick Abercrombie’s notion of an ‘open air lung’ for London, which led to the emergence of the Park in the 1960s. The All London Green Grid SPD provides strategic guidance for the Lee Valley and its wider context.
- 1.9 **Recent major planning applications have ‘tested’ the Park’s current policies**, including the redevelopment of Hale Wharf in Haringey and the proposed redevelopment of the Thames Water depot on Lea Bridge Road in Waltham Forest and the application for residential development on the Britannia Nurseries site in Broxbourne. These have underlined the need for a stronger, clearer policy response which takes account of the changing context.
- 1.10 A further important factor is the publication of **the Authority’s Corporate Land and Property Strategy 2017-2027**, which seeks to make best use of the Authority’s assets and includes

proposals for the acquisition and disposal of land and property within the Park. The Strategy requires appropriate planning policies that make clear the basis on which land will be acquired or disposed of and the implications for wider land use and development within the Park. Policies will also help determine the mitigation and enhancement priorities e.g. improved accessibility, green infrastructure improvements, new venues, and financial contributions to existing facilities.

Structure of the Park Plan Strategic Policies

- 1.11 The Plan includes the following
- Strategic context (Section 2)
 - Spatial portrait: the Lee Valley Regional Park today (Section 3)
 - Key planning challenges and opportunities (Section 4)
 - Vision, strategic aims and policy objectives (Section 5)
- 1.12 A separate Evidence Base has been published as a background document. This provides up to date information on the key features of the Park and the strategic planning issues, including visitor numbers and visitor management, sport and recreation, biodiversity and community health and wellbeing.

Strategic Environmental Assessment (SEA)

- 1.13 The Park Plan is not a Local Plan as defined by the Town and Country Planning Act 2004 and the LVRPA does not have a statutory duty to promote sustainable development. However, in order to demonstrate robustness and good practice, the Strategic Policies have been assessed against relevant SEA objectives. The Environmental Report has been published for consultation alongside this document.

2 Strategic Context



2 Strategic Context

2.1 This section describes the key factors that underpin the need for new strategic policies:

- The region's growing population
- London 2012 Olympics and its legacy
- London Stansted Cambridge strategic growth corridor
- Crossrail 1 and 2
- Potential for land value capture
- The LVRPA's Corporate Land and Property Strategy 2017-2027
- Current planning policy context

2.2 **Figure 2.1** shows the location and extent of the Park, while **Figure 2.2** provides an overview of the Park's current planning and development context.

The region's growing population

2.3 According to the London Plan, London's population is expected to rise from 8.2 million in 2011, to: 9.20 million in 2021; 9.54 million in 2026; 9.84 million in 2031; and 10.11 million in 2036. **The draft London Plan 2017 provides a longer term and revised population projection of 10.8 million by 2041.**

2.4 All the Park's riparian authorities are expected to experience 20%-29% growth in population by 2026. The Preferred Spatial Option for the West Essex and East Hertfordshire Housing market (HMA) area identifies the delivery of 51,100 new homes between 2011 and 2033; with c.18,000 in East Hertfordshire, c.11,000 in Epping Forest District Council and 9,000 in Harlow. Broxbourne Borough Council has identified a need for 7,718 new homes through to 2031. Similar levels of housing growth are expected in adjacent London Boroughs, for example the London Borough of Waltham Forest's Strategic Housing Market assessment identifies a need to deliver 1,810 dwellings per annum from 2014 to 2039 to meet the needs of its growing population.

2.5 This will have major implications for the use of land and the role and function of the Park. These include increased 'people pressure', particularly as open space deficiencies increase in the riparian authority areas. Tower Hamlets, for example, witnessed the fastest population growth of any local authority in England and Wales, particularly among the working-age population, making it one of the densely populated boroughs in the UK.

London 2012 Olympics and its legacy

2.6 A key part of the legacy of Olympics 2012 was the transformation of large areas of polluted former industrial land in the Lower Lee Valley into major sports facilities and the Queen Elizabeth Olympic Park (QEOP). As the owner of two London 2012 venues on QEOP and 35% of the parklands on it, the Authority has worked closely with the London Legacy Development Corporation (LLDC) to establish QEOP as one of the most important visitor destinations in the UK. The Authority also owns the Lee Valley White Water Centre in Waltham Cross, Broxbourne.

2.7 As well as creating these facilities within the Park, the legacy has improved access and connections within and to the Lower Lee Valley. This includes the construction of new bridges; for example between Hackney Wick and Stratford, improvement of the Lee Navigation towpath into Hackney to the north and the development of the Lee Valley White Water Centre which is now diversifying from just paddle sports into an extreme activity centre.

London Stansted Cambridge strategic growth corridor

- 2.8 The London Stansted Cambridge Corridor Consortium is a partnership of public and private organisations covering the area north of Tech City, the City Fringe, Kings Cross, and the Olympic Park, up through the Lee Valley and M11/A10, and West Anglia Rail corridors to Harlow and Stansted, and through to Cambridge.
- 2.9 The partnership was formed to organise and promote an economic area, with strong inter-connections; commuting to work patterns, clusters of industries and supply chains. The area is linked by the West Anglia rail lines, as well as key road networks such as the A10 and M11. It has a population of over 2 million people and growing. It is already home to strong business clusters, ranging from high-tech digital and bio-medical to logistical, resource recovery and food manufacturing.
- 2.10 The implementation of the Consortium's aspirations will create pressures and opportunities for the Park. Cutting across these is the need to ensure that the Park provides an appropriate, well designed and managed resource for businesses and residents. Section 3 provides further detail.

Crossrail 1 and 2

- 2.11 Crossrail 2 is a proposed new railway serving London and the South East. It will run underground between Wimbledon and Tottenham Hale and New Southgate, connecting with existing National Rail networks in Surrey and Hertfordshire.
- 2.12 Trains would emerge from the central core of the route at Tottenham Hale through a new tunnel portal and connect with existing railway tracks on the existing West Anglia Main Line to Broxbourne. The West Anglia Main Line, which runs immediately to the West of the Park and is already a major factor in the severance of the Park from communities to the west, would be upgraded from two to four tracks. **It is understood that the upgrade from two to four tracks would require the closure of any remaining level crossings. These policies and the Area Proposals will address severance and aim to improve permeability from surrounding communities.**
- 2.13 Crossrail 2 and the upgraded West Anglia Main Line will therefore support the planned growth in the Upper Lee Valley and bring potential opportunities for future use and development of the Park through improved rail services. **A potential eastern spur of Crossrail 2 via Hackney Central would create an additional east west public transport route and greater access to the southern section of the Park.**
- 2.14 ~~The extension of~~ Crossrail 1 (**Elizabeth Line**) will also affect parts of the Lower Lee Valley in London Borough of Tower Hamlets **and Stratford in the London Borough of Newham.**

Figure 2.1 Location Map

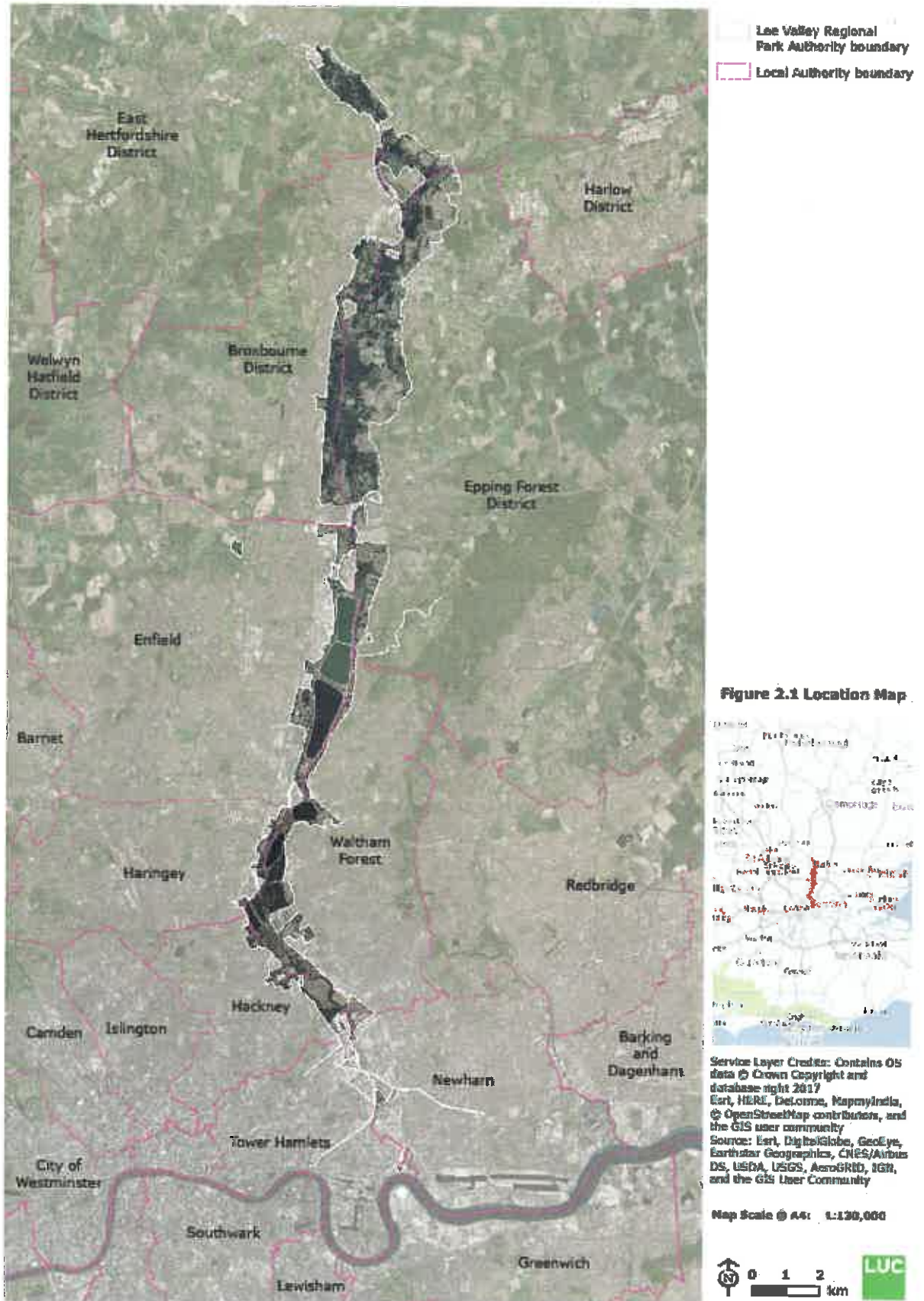
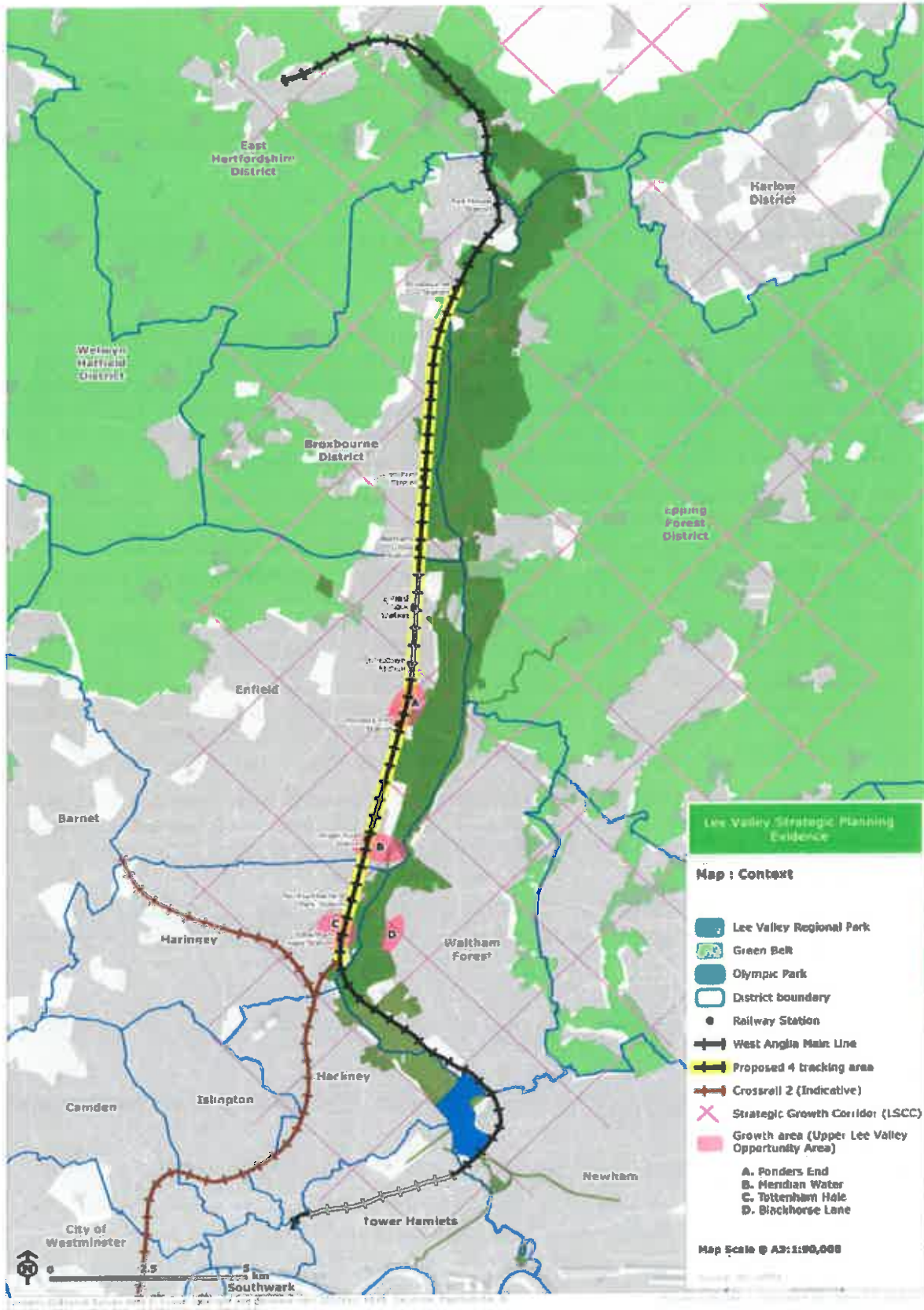


Figure 2.2 Current planning and development context Please amend - TFL say routing of West Anglia Main line is incorrect – it should go to Harlow rather than Hertford East



and through Hackney to Liverpool Str. They also ask that the proposed 4-tracking should include part of Crossrail 2. They also ask for Liverpool Street station to be labelled but I'm not sure how easy that is to do on this map?

Potential for land value capture

- 2.15 The changing context outlined above creates considerable potential for 'land value capture'. This is a type of public financing that recovers some or all of the value that public infrastructure generates for private landowners. ~~It is understood that this will form part of the funding model for Cross Rail 2.~~

The Park Authority's Corporate Land and Property Strategy 2017-2027

- 2.16 The LVRPA owns and manages approximately 1,600ha, about one third of the total Park area. It uses its own resources to develop and manage that estate, but works closely with a range of partners to secure additional resources and expertise in order to deliver the features, facilities and activities that contribute to the vision and aims for the Park. The remaining 3,200ha of the Park, about two thirds of the total Park area, is owned and managed by private ownership (28%), utility companies (24%), local authorities (9%) and government agencies (3%).
- 2.17 Land and property support the Regional Park by providing operational assets which contribute to delivery of its statutory objectives of providing regeneration opportunities. It is not a requirement of the Park Act that the Authority needs to own land to fulfil its statutory duties, but it puts it in a stronger strategic position as custodian of the Regional Park. Land ownership is arguably more important to the Authority than a National Park due to the fact that the Authority has limited planning powers. This being the case ownership is the ultimate control of uses of land within the Regional Park, which the Authority has a duty to "improve and preserve".
- 2.18 The Authority has powers under section 15 of the Park Act to acquire land ... 'whether within or without the Park, which they may require for any of the purposes of or in connection with any of their functions'. The Authority also has powers under Section 21(1)(a) 'to dispose of land belonging or held by them which is not required for the purposes of any of their functions'.
- 2.19 The adoption of a new **Land Acquisition** and **Property Disposal** strategy is designed to provide guidance to inform Authority decisions in line with its strategic purpose. Disposal of land could yield significant capital which could be used to support further acquisitions or be used to improve the existing estate.
- 2.20 The strategic policies will provide an overall policy framework which enables the Authority to make representations on Local Plans (or respond to Calls for Sites) with a background of policy support in its own Plan.

Current planning policy context

- 2.21 In accordance with good practice, the Park's new strategic policies should reflect planning policy at the national and regional scales.

National Planning Policy Framework

- 2.22 The NPPF (2018~~2~~) provides overarching planning policy for England. It identifies that the purpose of the planning system is to achieve sustainable development which is defined with reference to economic, social and environmental roles. The Regional Park has an important part to play in the delivery of this strategic objective.

- 2.23 Of particular relevance are the sections within the NPPF which seek the promotion of jobs and prosperity and support for business sectors which should be allowed to grow, e.g. the leisure sector. Other policies identify the importance of sustainable transport; this is of importance to the Regional Park given its geography which provides a network of routes for walking and cycling. This links to other policies designed to promote healthy communities.
- 2.24 Other policies in the NPPF's emphasise the protection of Green Belt land, conserving and enhancing the natural environment, and conserving and enhancing the historic environment.

Green Belt

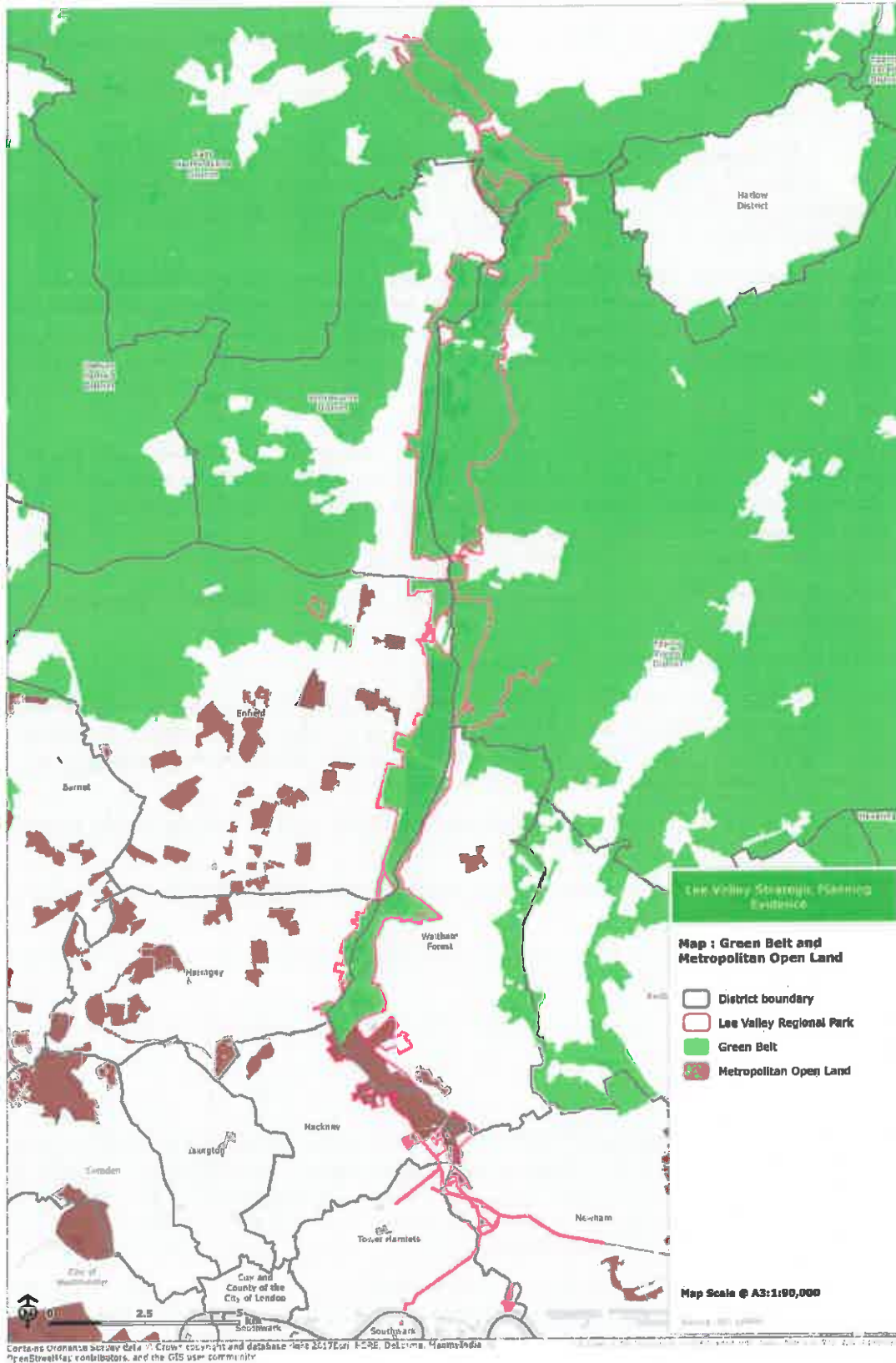
- 2.25 Almost all of the LVRP is designated either as Green Belt or Metropolitan Open Land (a London Plan designation) (see Figure 2.3). This reflects Sir Patrick Abercrombie's vision of the original Green Belt including 'parkways', stretching from central London to the outlying countryside. The Lee Valley is the best example of such a parkway.
- 2.26 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence (NPPF, para. 133 79). The NPPF makes clear that it is for local planning authorities to review the boundaries of Green Belt, but that changes should only be made in exceptional circumstances.
- 2.27 Importantly for the LVRP, para. 141 80 of the NPPF indicates that, once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.
- 2.28 This desire to enhance Green Belt land was given further impetus by the Government's recent Housing White Paper¹, which indicates that, if LPAs are able to demonstrate exceptional circumstances to amend Green Belt boundaries, local policies will also be required to "offset" the removal of land from the Green Belt by way of "compensatory improvements to the environmental quality or accessibility of remaining green belt land".



Green Belt and MOL designations protect the openness of the Park

¹HMG WHITE PAPER: 'FIXING OUR BROKEN HOUSING MARKET', February 2017

Figure 2.3: Green Belt and Metropolitan Open Land



Conserving and enhancing the natural environment

- 2.29 The NPPF does not refer specifically to regional parks, but paragraph ~~170~~ **109** confirms that the planning system should contribute to and enhance the natural and local environment by:
- ~~protecting and enhancing valued landscapes, geological conservation interests and soils~~ **a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);**
 - ~~recognising the wider benefits of ecosystem services~~ **b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;**
 - ~~minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;~~ **d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;**
 - **e) preventing both new and existing development from contributing to, or being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and**
 - **f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.**

Conserving and enhancing the historic environment

- 2.30 Paragraph ~~185~~ **126** of the NPPF indicates that ~~plans~~ **planning authorities** should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. ~~In developing This strategy, local planning authorities~~ should take into account:
- **a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;**
 - **b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;**
 - **c) the desirability of new development making a positive contribution to local character and distinctiveness; and**
 - **d) opportunities to draw on the contribution made by the historic environment to the character of a place.**

National Planning Practice Guidance

- 2.31 The National Planning Practice Guidance (NPPG) is a web-based resource that provides revised and updated planning guidance setting out what the Government expects from local authorities. The resource directly refers to the NPPF and is periodically updated by the government. **It will in due course be updated, where necessary, to reflect changes to the NPPF – all references below are to the NPPF 2018.**
- 2.32 NPPG states that open space sports and recreation facilities have 'health and recreational benefits to people living and working nearby and have ecological value and contribute to the green infrastructure (NPPF para ~~171~~ **114**) as well as being an important part of the landscape and setting of built development (NPPF para ~~7~~ **60-10**)'.² Importantly for the LVRPA, the NPPF notes that it is for local planning authorities to assess the need for open space and opportunities for new provision in their areas. The NPPG refers authorities to Sport England's guidance on how to

² <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

assess the need for sport and recreation facilities.³ Furthermore local authorities have the 'duty to cooperate'⁴ where open space serves a wider area.⁵

- 2.33 NPPG notes that 'Local planning authorities should seek opportunities to work collaboratively with their partners to develop and deliver a strategic approach to protecting and improving the natural environment based on local priorities and evidence. They should consider the opportunities that individual development proposals may provide to enhance biodiversity and contribute to wildlife and habitat connectivity in the wider area'.⁶

London Plan

- 2.34 The London Plan is the spatial development strategy for Greater London. The current London Plan, adopted in 2016, places considerable emphasis on the importance of green infrastructure in London. Policy 2.18 on Green Infrastructure Indicates that:

- a) The Mayor will work with all relevant strategic partners to protect, promote, expand and manage the extent and quality of, and access to, London's network of green infrastructure. This multifunctional network will secure benefits including, but not limited to, biodiversity; natural and historic landscapes; culture; building a sense of place; the economy; sport; recreation; local food production; mitigating and adapting to climate change; water management; and the social benefits that promote individual and community health and well-being.
- b) The Mayor will pursue the delivery of green infrastructure by working in partnership with all relevant bodies, including across London's boundaries, as with the Green Arc Partnerships and Lee Valley Regional Park Authority. The Mayor has published supplementary guidance on the All London Green Grid to set out the strategic objectives and priorities for green infrastructure across London (emphasis added).

- 2.35 The London Plan is supported by the 'All London Green Grid' Supplementary Planning Guidance (ALGG). This divide London into eleven Green Grid Areas. The formation of ALGG Area steering groups brought together the London boroughs, representatives of partner agencies and other stakeholders to develop and implement the Green Grid vision, objectives and projects, area by area.

- 2.36 The 'Lea Valley & Finchley Ridge' Green Grid Area includes a range of objectives for the Lea Valley, as follows:

- To improve the quantity and quality of accessible open space and to enable people to access it more easily, especially in areas of deficiency, through;
- To improve visual and physical access to nature, especially in areas of deficiency help minimise flood risk and reduce the impact of the 'heat island effect'
- To Improve connections to and between open spaces, to create an integrated network of green space.
- To improve the quality and range of visitor destinations to attract visitors from near and far
- To ensure that the green space network within the area supports the development of healthy communities
- To build upon the presence of existing productive landscapes within the Lea Valley and Finchley Ridge area through;
- To develop green space and green infrastructure sector skills in order to maintain a high quality green space network and support London's transition to the low carbon economy

- 2.37 The importance of green infrastructure is further reflected in the Mayor's London Infrastructure Plan 2050 and the Green Infrastructure Task Force report (2015). This makes a number of recommendations, including the appointment of a Green Infrastructure commissioner and, a

³ <http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/>

⁴ <https://www.gov.uk/guidance/duty-to-cooperate>

⁵ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

⁶ <https://www.gov.uk/guidance/natural-environment>

review of governance, better support for a sub-regional approach to green infrastructure. It also recommends a series of objectives for green infrastructure, which are closely aligned to the objectives of the LVRP:

- *Promoting Healthy Living – improving health outcomes by increasing physical activity, reducing stress, provision of tranquil areas and removing pollutants.*
- *Strengthening Resilient Living – keeping the city cool, its air clean, and protecting it from flooding.*
- *Encouraging Active Living – increasing levels of walking and cycling.*
- *Creating Living Landscapes – enhancing natural processes for the benefit of people and wildlife and conserving the most special landscapes, habitats and species.*
- *Enhancing Living Space – providing a range of outdoor space for cultural, civic, learning and community activity, including productive landscapes.*

2.38 The Task Force's recommendations were included in the draft London Environment Strategy (August 2017). These recommendations reflect the broad offer of the Regional Park.

Natural Capital Accounts for Public Green Space in London 2017

2.39 In 2017 the GLA published a short report, Natural Capital Accounts for public green space in London, which quantified the economic value and benefits of public parks. This estimated that for every £1 spent by local authorities and their partners on public green space £27 was delivered either in 'avoided costs', particularly around the public health agenda and direct benefits linked to 'well being' and climate change mitigation. On the basis of the report's findings, London's open spaces contribute £5 billion per annum, and the Regional Park contributes £250 million per annum. If the report's findings are extrapolated across the whole of its funding sub region the Regional Park contributes £0.5 billion per annum. This is significant when compared to the current levy contribution of £0.81 (2018-2019) per capita per annum for each resident of the sub region.

Strategic Cultural Areas

2.40 ~~The London Plan defines the Lee Valley Regional Park as a Strategic Cultural Area, reflecting the Park's value as a piece of strategic green infrastructure comprising a diverse range of leisure and cultural facilities and open spaces which cuts across administrative boundaries.~~

2.41 ~~Policy 4.5 indicates that the Mayor will, and boroughs and relevant stakeholders should, promote, enhance and protect the special characteristics of major clusters of visitor attractions including those identified in Strategic Cultural Areas in Map 4.2.~~

The Mayor's Opportunity Areas in London

Lower Lea Valley Opportunity Area Planning Framework

2.42 The Lower Lea Valley Opportunity Area Planning Framework was published by the Mayor of London in January 2007 and set out his views on how the Lower Lea Valley as whole should change through the intensification of existing activities, the upgrading of facilities and buildings, and the managed release of industrial land to provide a broader range of land uses. **The Lower Lea Valley OAPF is currently being updated.**

2.43 The Olympic Legacy Supplementary Planning Guidance (OLSPG), published in July 2012, replaces the Lower Lea Valley OAPF **where the two areas overlap**. This has been taken forward through the adopted Local Plan (2015) prepared by the London Legacy Development Corporation (LLDC). Work has recently commenced on revising this plan.

Upper Lea Valley Opportunity Area Planning Framework

2.44 The Upper Lea Valley Opportunity Area Planning Framework was published by the Mayor in July 2013. The OAPF sets out eight objectives for the area:

- growth at Tottenham Hale, Blackhorse Lane, Meridian Water in Central Leaside and Ponders End
- optimised development and redevelopment opportunities along the A10/A1010 Corridor, in particular the Tottenham High Road Corridor and Northumberland Park
- over 15,000 new jobs by 2031 across a range of industries and a green industrial hub creating greater learning and employment opportunities
- over 20,100 new well designed homes by 2031
- full integration between the existing communities and the new jobs, homes and services provided as part of the new developments
- a Lee Valley Heat Network linked to the Edmonton Eco Park
- significant investment and improvements to transport infrastructure, including four trains per hour on the West Anglia Main Line and improvements to help people walk and cycle more easily through the area
- a fully accessible network of green and blue spaces which open up the Lee Valley Regional Park. The networks between them will be improved benefitting both people and wildlife

The GLA is in the process of revising this document which is likely to reflect its new regeneration priorities and refer to Crossrail 2.

Housing Zones

- 2.45 The Mayor has set out plans for the development of 30 Housing Zones in partnership with London boroughs and their development partners as part of his Housing Strategy. A total of £600 million in funding has been made available by the Mayor and government for the construction of 75,000 new homes. The programme is also expected to provide 150,000 associated jobs over the next ten years.
- 2.46 The building of homes in Housing Zones will be supported by a range of planning and financial measures. All Housing Zones will be set up by an agreement which shares the duty of building these homes between partners. This will ensure the numbers of planned new homes are built.
- 2.47 Four Housing Zones are situated close to or partly within the Lee Valley Regional Park. These are⁷:
- LB Waltham Forest - Blackhorse Lane and Northern Olympic Park 2,608 homes
 - LB Enfield - Meridian Water and Edmonton Futures 10,000 homes⁸
 - LB Haringey - North Tottenham 1,956 homes
 - LB Tower Hamlets - the Poplar Riverside, **9,000 ~~3923~~ homes in total over 15 years (ref LBTH Housing Delivery Strategy Sept 2017)**

London Environment Strategy

- 2.48 The Mayor published a public consultation draft of the London Environment Strategy in August 2017. This includes a number of commitments relating to green infrastructure, many of which are relevant to the LVRP:
- to make London the first National Park City, including providing a Greener City Fund
 - to support communities to plant more trees and improve green spaces
 - to increase and improve green infrastructure in areas where Londoners, especially children, have the least amount of green space
 - to use a new Urban Greening Factor to make sure that new developments are greener
 - to protect London's Green Belt from further development

⁷ https://www.london.gov.uk/sites/default/files/housing_zones_brochure_march_2016_5.pdf

⁸ <https://new.enfield.gov.uk/news-and-events/edmonton-housings-33-million-boost/>

- to set up a London Green Spaces Commission to roll out new ways for the Mayor, London boroughs, community groups and others to fund, manage and value green spaces and nature
- to identify the true economic value of London's green spaces through a Natural Capital Account
- to use the planning system to protect London's biodiversity, offsetting any reductions caused by new developments with increases elsewhere'.

2.49 The Mayor's Transport Strategy (MTS) includes a target for 80% of all trips in London to be by walking, cycle or public transport by 2041 and this is reflected in the draft London Plan 2017

Draft new London Plan (2017)

- 2.50** The Mayor published a draft new London Plan on 29th November with the formal consultation period commencing on Friday 1st December 2017 until Friday 2nd March 2018. The Examination will take place **early** in ~~Autumn~~ **2019** and it is anticipated that the plan will be published in Autumn 2019.
- 2.51** The key points of significance to the Park include:
- The Draft Plan continues to protect the Green Belt and Metropolitan Open Land.
 - Aims to make London 50% green by 2050 in order to help make London a 'National Park City'.
 - Aims to make the Green Belt and MOL more accessible and better quality.
- 2.52 The draft London Plan also sets an overarching objective to plan for 'good growth' - sustainable growth that works for everyone - aiming to deliver genuinely affordable homes and a more socially integrated and sustainable city. As part of the Lee Valley Opportunity Area there will be an increase in housing development and densities close to the Park's boundary. This will create both opportunities and challenges for the Authority, for example to ensure green space and infrastructure within development complement and connect with the Park, to secure enhancements for the Park as part of the development process and strengthen the carrying capacity of the parklands, protect sensitive ecological assets and address flood risk and water quality issues.**

Riparian Authorities' Local Plans

- 2.53** The Riparian Authorities are at various stages of Local Plan preparation. Those in London are seeking to reflect the London Plan policies and aspiration, while those in Essex and Hertfordshire have their own strategic focus.
- 2.54** All of the authorities face similar issues, in terms of seeking to accommodate significant housing growth targets, while retaining sufficient protected land for other uses such as employment, community facilities, schools and open space etc. These issues are particularly acute in the London boroughs where almost all of the authorities already have deficiencies of open space.
- 2.55** While the Regional Park is not intended to make up for the open space deficiencies of the riparian boroughs, it clearly plays an increasingly important role in providing semi natural open space and green infrastructure and contributes to addressing open space deficiencies in these boroughs.
- 2.56** The policy framework for areas alongside the Lee Valley is beginning to firm up in some areas. In Hackney, for example, the emerging Lea Valley Edge policy aims to develop brownfield sites, enhance public transport and bus routes and make improvements to the public realm, all of which should help to improve accessibility to the LVRP. The approach to growth within the Lea Valley Edge is consistent with the approach set out in the GLA's upper Lea Valley Area Opportunity Area Framework is being prepared alongside the plan.

3 Spatial Portrait the Lee Valley Regional Park today



3 Spatial Portrait: the Lee Valley Regional Park today

- 3.1 In order to plan for the future it is necessary first to understand the Park today, and the issues, challenges and opportunities that lie ahead. This section provides a spatial portrait, while further information is contained in the Evidence Base. Section 4 describes the challenges and opportunities that the strategic polices seek to address.

A regional park for a global city

- 3.2 The original vision for the Park was expressed by Sir Patrick Abercrombie in the Greater London Plan, 1944. This suggested that 'the Valley gives the opportunity for a great piece of regenerative planning.....every piece of land welded into a great regional reservation'.
- 3.3 Following the course of the River Lea, the LVRP extends from the River Thames, through Queen Elizabeth Olympic Park, north and east London and into Essex and Hertfordshire. Covering over 4000 hectares (or 40 square kilometres, equivalent to 28 Hyde Parks), the Park is the largest concentration of publically accessible open space in the region, interspersed with various leisure facilities with some pockets of residential, industrial or horticultural developments.
- 3.4 The Park's geographic context varies significantly, from the densely developed, industrial and post-industrial landscapes in the London boroughs in the south (with the exception of the Queen Elizabeth Olympic Park) to open countryside in the north. The middle, 'peri-urban' section of the Park is dominated by the Thames Water storage reservoirs with industrial areas on its western edge. This provides an area of transition.
- 3.5 By virtue of its scale and character the Park is unique in the London, UK and even international contexts. There are other Regional Parks - the Colne Valley Regional Park and the Wandle Valley Regional Park, but they do not benefit from the scale of contiguous land mass, large numbers of sites of ecological significance or internationally renowned world class venues as the LVRP.

Distinctive and diverse landscapes ~~(to be updated once draft Landscape Character Assessment finalised)~~

- 3.6 Although discernibly a river valley, the Lee Valley is generally flat, with a floodplain more than a mile wide in the middle and the southern reaches. Further north the valley is more pronounced, with the Epping Forest ridge lying to the east.
- 3.7 The Park includes a diverse series and contrasting range of landscapes. These include semi natural lowland river landscapes and flood meadows and mosaic wetland landscapes which are the rich legacy of mineral extraction, to post-industrial and inner London landscapes.
- 3.8 The ~~significant~~ water features within the valley are ~~significant the unifying~~ elements of the valley landscape. These include major water channels (most notably the River Lee Navigation and the River Lea) **which provide a unifying spine to the Regional Park. as well as There are also** extensive water bodies in the form of flooded gravel pits in the upper valley and large elevated reservoirs which occupy the valley throughout the midsection. The water courses in the lower reaches of the valley form a complex series of interconnecting channels linking with the River Thames.
- 3.9 Sand and gravel extraction commencing in the early 1900s has been a major influence in the changing landscape of the valley. Flooded gravel pits have formed lakes of varying character, which have established reed beds, carr woodland and extensive willow, alder and birch scrub, as

well as expanses of open water dotted with islands and promontories. This enclosed wooded character is suggestive of the early valley landscape prior to clearance for pasture.

- 3.10 The valley has become increasingly accessible as a place for recreation with the development of the railways and roads. Urban expansion in the surrounding areas has seen the valley being used more and more for recreational purposes with extensive areas developed as playing fields and in some cases landfill restoration has artificially raised the valley floor leaving unnatural landforms. The decline of some industries and decommissioning of former power stations and water-related processing plants has provided opportunities to restore derelict sites.
- 3.11 Since it was conceived, the LVRP has provided a regional destination for formal and informal recreation, sport and leisure. The London 2012 Olympic and Paralympic Games introduced a national and international dimension to the Park's profile. It receives millions of visitors each year most visiting to enjoy the semi-natural landscape with its wildlife interest and a break from the surrounding urban environment.
- 3.12 The Park's intrinsic value is that it lies in such close proximity to often densely developed riparian boroughs.
- 3.13 The Authority's draft Landscape Character Assessment identifies the diversity and variety of the Lee Valley landscape by identifying 12 landscape types which share common patterns of geology, topography and land uses and **38** distinct character areas:
- Rural valley floor mosaic with wetlands and marshes
 - Urban valley floor with reservoirs and wetlands
 - Urban valley floor with marshland
 - Valley floor with leisure facilities
 - Valley floor with post industrial parks
 - Peri-urban valley floor
 - Terraces with farmland
 - Terraces with industrial legacy parkland
 - Terraces with woodland and pasture
 - Lower River backwaters
 - Historic gardens
 - Urban parks
- 3.14 The assessment provides an overview of the generic landscape character types that occur throughout the LVRP before describing in more detail the intrinsic landscape character and qualities of each unique geographical area. It also provides a strategy and guidance that will help ensure local distinctiveness is conserved, enhanced or restored and, where appropriate encourages the creation of new valued landscapes in association with any future change.

Revealing history

- 3.15 The Park is an Archaeological Priority Area and includes a diverse range of heritage assets that reflect various phases of its development from the natural hunter-gather landscape of the Palaeolithic and Mesolithic, the early agricultural landscape in the Neolithic and Bronze Ages, followed by the rapid growth of London in the Roman and Medieval periods through to modern day. In particular, the valley's peat have been found to preserve archaeological features and artefacts from all periods, including prehistoric and roman remains. For example, excavation and construction works in the Lower Lee Valley in preparation for the London 2012 Olympic and Paralympic Games, revealed a Bronze Age settlement, an Iron Age burial ground including four skeletons, a Neolithic flint axe, Roman River walls, a 19th Century clinker-built boat and a World War II anti-aircraft battery.

- 3.16 As well the presence of buried archaeological remains, the Park provides important insights into London and the wider region's more recent industrial heritage. Early industrialisation was a result of the availability of water power for numerous mills. These include the Waltham Abbey Royal Gunpowder Mills (originally a fulling mill but already producing gunpowder by 1665), the 19th century Royal Small Arms Factory at Enfield and Wright's Flour Mill (Greater London's last surviving working mill) at Ponders End. Further south at Bow is the Three Mills tidal complex, with the grade I listed House Mill open to the public.
- 3.17 In the 18th century the Bow porcelain factory was developed. In the 19th century the lower Lea became an important area for the manufacture of chemicals, in part based on the supply of by-products such as sulphur and ammonia from the Gas Light and Coke Company's works at Bow Common. Other industries included Bryant and May, Berger Paints, Stratford Railway Works and confectionery manufacturer Clarnico (later Trebor). Where the river meets the Thames were the Orchard House Yard and Thames Ironworks shipyards. **At Tottenham the Markfield Beam Engine and Museum features a Grade 2 listed engine hall housing a restored, working steam-powered beam engine dating from 1888. The building is set in Markfield Park, in the grounds of the former Tottenham Sewage Works once a key public health facility serving the area (1850's to 1964) - together an example of industrial heritage of social and engineering importance.**
- 3.18 From as early as the 18th century, by virtue of its rich soils, the Lea Valley was also renowned for its market gardens, producing plants, fruits and vegetables which were sold at London markets and beyond. This continues today, with extensive nurseries and glasshouse areas in and around the northern part of the Park.



Waltham Abbey Gardens.

- 3.19 In the 20th century the combination of transport, wide expanses of flat land and electricity from riverside and canal-side plants such as Brimsdown, Hackney, Bow and West Ham led to expansion of industries. Some of these industrial areas continue to thrive, while others have declined; some have been converted to retail or leisure uses.
- 3.20 Gravel extraction in the Lea Valley started in the 1920s. Many of the pits were back-filled with 'uncontrolled arisings' which were contaminated. This has meant in a few cases that public access is restricted due to the risk to health and safety. Where pits were only partially filled they have become successful habitats for wildlife, both flora and fauna.
- 3.21 The Lea Valley reservoirs are an important part of the infrastructure which, for over two centuries, has provided drinking water to London. They contain a range of interesting period buildings and examples of engineering heritage. The opening up of Walthamstow Reservoirs as a new wetlands nature reserve includes the former Engine House, which will host a vibrant range of

exhibitions, installations and educational activities that explore the reservoirs' natural, social and industrial history. Nearby, the historic Coppermill tower offers great views across the Wetlands and the London skyline.

- 3.22 Appreciation of heritage features contributes positively to the identity and image of the Park, as well as increasing the attractiveness of the Park for visitors. **The Park contains a wealth of historic buildings reflecting the various phases of its long history of human settlement, many of which are designated Conservation Areas.** However, there are a number of features where heritage value could be enhanced. There remains potential to improve accessibility and interpretation at sites including **Markfield beam Engine & Museum**, East India Dock Basin, Rye House Gatehouse and Royal Gunpowder Mills.

A regional destination for formal and informal recreation

- 3.23 Since it was conceived, the LVRP has provided a regional destination for formal and informal recreation. The London 2012 Olympic and Paralympic Games introduced a stronger national and international dimension to the Park's offer.
- 3.24 The Authority owns one third of the parklands on Queen Elizabeth Olympic Park and two London 2012 venues; Lee Valley VeloPark, home to four cycling disciplines and Lee Valley Hockey and Tennis Centre which offers state-of-the-art hockey and tennis facilities. Both these venues are located in the north of Queen Elizabeth Olympic Park.
- 3.25 Other international **and national** sports venues in the Park include the Lee Valley Athletics Centre, Lee Valley White Water Centre, Lee Valley Ice Centre and Lee Valley Riding Centre.
- 3.26 As shown in **Figure 3.2** in the Evidence Base, open sports facilities are spread throughout the Park. Notable examples include the Hackney Marsh Recreation Grounds, Lee Valley Golf Course and the Lee Valley Boating Centre. Lee Valley Park Farms in the Upper Lee Valley is a popular leisure attraction and the Lee Valley Camping and Caravan Park provides affordable visitor accommodation within the Park.
- 3.27 The Park is also used extensively for informal recreation, particularly walking, **and cycling and recreational boating, including cruising along both the Lee and Stort Navigations.** It provides a sense of countryside on London's doorstep.
- 3.28 While visitor numbers have increased by 46% over the last five years, with over 6.5 million visitors in the year 2015-2016, this partly reflects the impetus provided by the 2012 Olympic Games and the creation of the Queen Elizabeth Olympic Park.

Multifunctional Green infrastructure - for health and wellbeing and a sense of place



The Queen Elizabeth Park

- 3.29 Around one third of visits to the Park are for specific sport and recreation activities, while two thirds are to the Park's open spaces. The Park's green infrastructure provides a setting for informal recreation and, in combination with the Park's heritage assets, provides a sense of place and history. Improvements to the Park's green infrastructure network can make a significant contribution to the conservation, enhancement and interpretation of the setting of the Park's **historic heritage** assets, helping to safeguard their significance. This in turn brings health and wellbeing benefits, including increased life expectancy and reduced health inequality, improvements in levels of physical activity and health, and promotion of psychological health and mental wellbeing⁹.
- 3.30 This applies throughout the Park, although there is particular potential in the southern sections of Park, where surrounding development densities and the pace of change are higher and there are higher levels of deprivation and poor access to open space within the urban areas.

A place for wildlife and contact with nature

- 3.31 The Park contains a diverse range of high quality habitats including rivers and streams, standing open water, floodplain grassland and fen, wet woodland, and urban post-industrial habitats. **These habitats support a range of species of which individuals and their assemblages range in status from local to international importance.** Eight sites in the Park are designated Sites of Special Scientific Interest (SSSI); **including** Amwell, Rye Meads, Turnford and Cheshunt Pits, Walthamstow Reservoirs, Waltham Abbey Woods, Cornmill Stream and Older River Leea, Chingford Reservoirs, and Walthamstow Marshes. The first four of these together form the Lee Valley Special Protection Area (SPA) and Ramsar site.

⁹ Forest Research (2010) *Benefits of green infrastructure*

- 3.32 Walthamstow Wetlands is a new nature reserve and urban wetland opened to the public in late 2017. This 211 hectare operational Thames Water site forms a significant area of wetland habitat within the Park designated as a SSSI and containing important heritage assets. This new nature reserve unlocks a substantial area of the Park in the south which hitherto had been largely unknown and unseen providing access to nature, recreational, educational and volunteer opportunities as well as a nature based visitor attraction.
- 3.33 The Park therefore offers a large scale and high quality biodiversity resource, very close to where people live. This high level of 'access to nature' for such large numbers of people who often are living in areas of high deprivation is a very important benefit provided by the Park.



Osier Marsh Wet Woodlands

Connecting people with places

- 3.34 As well as providing opportunities for recreation, the Park's many walking and cycling routes form part of or connect with some of London's strategic routes, such as the Lea Valley Walk, the London Walk and Capital Ring. These routes also provide access to the wider countryside in the north of the Park and beyond its boundaries linking into towns and villages within Essex and Hertfordshire. These strategic public rights of way, together with the many shorter connecting routes within the Park, play an important role in increasing permeability to north and north east London, providing access to and between adjacent urban areas as well as to the countryside.



Ecosystem services

- 3.35 As described above, the LVRP is neither a formal nor informal park: but it offers a diverse mosaic of experiences for visitors; a reflection of its value as strategic green infrastructures. In terms of the emerging London environment strategy it provides essential 'ecosystem services' of immense financial and social importance to the sustainable development of London, as well as to communities in Essex and Hertfordshire. This was reflected in the original concept of the Park being an 'open-air lung' for London.
- 3.36 **Table 3.1** summarises the range of services, or benefits, currently provided by the Park. Understanding these benefits will help inform the strategic policies. The table also identifies the main stakeholders or 'beneficiaries', of the Regional Park as expounded in the 2011 Natural Environment white paper, *The Natural Choice: securing the value of nature*.
- 3.37 This approach is consistent with the draft London Environment Strategy, referred to in section 2 of this report. The draft strategy includes an objective to 'value London's natural capital as an economic asset and support greater investment in green infrastructure'. It also indicates that 'the Mayor will work with London Councils and other stakeholders to promote and share a London Natural Capital Account and a natural capital accounting framework. The Mayor will encourage its use by London boroughs and other major land-managers'. The newly emerging methodology of Natural Capital Accounting is designed to enable better measurement of the value that the natural capital owned or managed by an organisation produces for the organisation itself and society in general (asset values), and better recording of the costs (liabilities) of maintaining this value. **It allows a new way to consider how parkland should be considered.**

Table 3.1: Ecosystem services provided by the LVRP

Ecosystem services	Key stakeholders and beneficiaries
<p>Supports biodiversity</p> <p>The main habitat types found within the Park are: rivers and streams; standing open water; grassland and fen; woodlands; and urban (especially post-industrial habitats). These habitats support a range of species of which individuals and their assemblages range in status from local to international importance.</p>	<p>The region's population</p> <p>Riparian Authorities</p> <p>Natural England</p> <p>Thames Water</p> <p>London Wildlife Trust</p> <p>Herts and Middlesex Wildlife Trust</p> <p>Essex Wildlife Trust</p> <p>Canal and River Trust</p>
<p>Connects people with nature and the countryside</p> <p>The predominantly natural and semi-natural character of the Park allows people to experience the countryside and connect with nature close to where they live.</p> <p>Evidence suggests that access to good quality natural green space has a number of associated benefits to health and wellbeing, including increased life expectancy and reduced health inequality, promotion of psychological health and mental well-being.¹⁰</p> <p>The Park, therefore, is vital resource for those nearby to connect with nature and experience a sense of countryside. This is particularly significant for people in riparian boroughs with limited open space.</p> <p>The significance of this benefit is further amplified by the forecast growth in urban development within the riparian authorities and London more widely over the coming decades.</p>	<p>Park users</p> <p>Riparian Authorities</p> <p>National Health Service</p> <p>Thames Water</p> <p>Canal and River Trust</p>
<p>Provides a sense of openness and tranquillity</p> <p>The natural character and lack of buildings affords a strong sense of openness and tranquillity, which are important for well-being and spiritual nourishment.¹¹</p> <p>Ensuring openness and tranquillity is particularly important for southern part of the Park, which is bordered by increasingly dense urban development.</p>	<p>Park users</p> <p>Riparian Authorities</p>
<p>Keeps the air clean</p> <p>Long term exposure to air pollution is linked to a number of adverse health effects including decline in lung function, asthma, type 2 diabetes, problems with brain development and cognition and cardiovascular diseases. Moreover recent evidence suggests that air pollution contributes to approximately 40,000 early deaths a year in the UK.¹²</p> <p>The Park's wide expanse of vegetation plays a role in keeping the air clean. Trees and other vegetation are recognised as being</p>	<p>The region's population</p> <p>Riparian Authorities</p> <p>The National Health Service</p> <p>London City Airport and Stansted airport, both of which make considerable contribution to particulates in London</p>

¹⁰ Forest Research (2010) Benefits of Green Infrastructure. Available at [http://www.forestry.gov.uk/pdf/urgp_benefits_of_green_infrastructure.pdf/\\$FILE/urgp_benefits_of_green_infrastructure.pdf](http://www.forestry.gov.uk/pdf/urgp_benefits_of_green_infrastructure.pdf/$FILE/urgp_benefits_of_green_infrastructure.pdf)

¹¹ Environmental Protection UK (2010) Quietening Open Spaces: Towards Sustainable Soundscapes for the City of London

¹² NHS England (2016). Air pollution kills 40,000 per year according to a study by the Royal College of Physicians. Available at: <http://www.nhs.uk/news/2016/02February/Pages/Air-pollution-kills-40000-a-year-in-the-UK-says-report.aspx>

Ecosystem services	Key stakeholders and beneficiaries
<p>able to filter particulates and gaseous pollutants so improving the quality of air in and around green spaces.¹³¹⁴</p> <p>This, in combination with the absence of sources of pollution (e.g. road traffic within the Park), means local air quality is better than surrounding areas and the Park provides a refuge for surrounding residents.</p>	
<p>Increases physical activity through formal and informal activities</p> <p>The Park's built sports facilities, open spaces, cycle and footways, and waterways facilitate active lifestyles.</p> <p>According to Sport England, physical activity including Sport is linked to reduced risk of over 20 illnesses, including cardiovascular disease, Type 2 diabetes and some cancers. It can also save between £1750 and £6900 in healthcare costs per person.¹⁵</p>	<p>Sub-regional catchment</p> <p>Riparian Authorities</p> <p>National catchment for major events</p> <p>Park users</p> <p>National Health Service</p> <p>Sport England</p>
<p>Heat amelioration</p> <p>Research shows that urban areas are usually a degree or two warmer than surrounding rural areas. This is due to the urban heat island effect, which is caused by the absorption of direct solar radiation by buildings and manmade surfaces and a lack of vegetation in urban areas.</p> <p>Green open spaces, like the majority of the Park, play a role in mitigating the effects of higher temperatures in surrounding urban areas through evapotranspiration and the shading and conversion of solar radiation to latent heat.¹⁴</p>	<p>Park users</p> <p>Riparian Authorities</p> <p>Sub regional catchment</p>
<p>Creates opportunities to learn</p> <p>Learning is supported by a number of the Park's land uses and facilities including sports facilities, nature reserves and community gardening. The Authority's Youth and Schools Programme makes considerable use of these resources</p> <p>Of particular importance are the opportunities the Park affords to learn in the natural environment. Research done by Kings College London on behalf of Natural England states that learning in the natural environment has direct benefits as diverse as educational, health and psychological and indirect benefits ranging from social to financial. The same research states that children from urban environments are particularly disadvantaged with regard to connectivity with nature.¹⁶</p>	<p>Sub regional catchment</p> <p>Riparian Authorities</p> <p>Schools and Universities</p>
<p>Boosts the local economy</p> <p>Recreational facilities such as built sports facilities in the Park provide direct economic benefits through creation of jobs. Evidence from Sport England suggests that sport and sport related activity is estimated to support over 400,000 full-time jobs – 2.3 % jobs in England.</p> <p>The Authority and its leisure contractor together currently employ just over 400 full time staff Trust employ 83 and</p>	<p>Sub regional catchment</p> <p>Riparian Authorities</p>

¹³ GLA (2012) Green Infrastructure and Open Environments: The All London Green Grid: Supplementary Planning Guidance. Available at https://www.london.gov.uk/sites/default/files/algg_spg_mar2012.pdf

¹⁴ Forest Research (2010) Benefits of Green Infrastructure. Available at [http://www.forestry.gov.uk/pdf/urgp_benefits_of_green_infrastructure.pdf/\\$FILE/urgp_benefits_of_green_infrastructure.pdf](http://www.forestry.gov.uk/pdf/urgp_benefits_of_green_infrastructure.pdf/$FILE/urgp_benefits_of_green_infrastructure.pdf)

¹⁵ Sport England Website. Benefits of Sport

¹⁶ Natural England Commissioned Report (2016). Learning in the Natural Environment: Review of social and economic benefits and barriers.

Ecosystem services	Key stakeholders and beneficiaries
<p>350 staff respectively. In addition 150 seasonal casuals are normally employed each year. Sport England also describes the indirect economic benefit of sport in the form of improved health, reduction in youth crime and community development.¹⁷</p> <p>Evidence also suggests green infrastructure, like the large expanses of semi-natural land including productive landscapes that occupy the Park, have strong economic benefits. Forest Research identifies three main strands of economic benefit linked to the presence of green infrastructure: inward investment and job creation; increased land and property values; and local economic regeneration.¹⁸</p>	
<p>Protects London from flooding</p> <p>The presence of green open spaces in the Park helps protect London from flooding, due to a reduction in surface run-off.¹⁹</p> <p>Hard flood defences such as the Lee Flood Relief Channel also play a role in protecting the region from flooding.²⁰</p>	<p>Sub regional catchment</p> <p>Riparian Authorities</p> <p>Environment Agency</p> <p>Private utility companies e.g. Thames Water²¹, National Grid with vested interest in protecting against flood damage.²²</p> <p>Network Rail²³</p> <p>Land development companies</p>
<p>Appreciation of heritage</p> <p>The presence of different heritage features in the Park instils an appreciation of heritage which is linked to a number of other benefits. Research by English Heritage also shows that visiting heritage sites has a significant positive effect on life satisfaction. Heritage features also can instil communal benefits through a deeper sense of collective identity, linked to sense of place.²⁴</p> <p>Enhancing appreciation of heritage also has economic benefit through the creation of jobs. Research by the Heritage Lottery Fund suggests that heritage accounts for 1.28 million jobs in the UK.</p>	<p>Park users</p> <p>Riparian Authorities</p> <p>Historic England</p> <p>Local communities</p>
<p>Supplies water to London</p> <p>The reservoirs managed by Thames Water in the Park contribute significantly to water supply in London.</p>	<p>Sub regional catchment</p> <p>Riparian Authorities</p> <p>Thames Water</p>
<p>Provides food</p>	<p>National and Sub regional catchment</p>

¹⁷ Sport England (2013). Economic value of sport in England. Available at: www.sportengland.org/media/3174/economic-value-of-sport-summary.pdf

¹⁸ Benefits of Green Infrastructure: Report by Forest Research (2007). Available at [http://www.forestry.gov.uk/pdf/urgp_benefits_of_green_infrastructure.pdf/\\$FILE/urgp_benefits_of_green_infrastructure.pdf](http://www.forestry.gov.uk/pdf/urgp_benefits_of_green_infrastructure.pdf/$FILE/urgp_benefits_of_green_infrastructure.pdf)

¹⁹ Forest Research (2010) Benefits of Green Infrastructure. Available at [http://www.forestry.gov.uk/pdf/urgp_benefits_of_green_infrastructure.pdf/\\$FILE/urgp_benefits_of_green_infrastructure.pdf](http://www.forestry.gov.uk/pdf/urgp_benefits_of_green_infrastructure.pdf/$FILE/urgp_benefits_of_green_infrastructure.pdf)

²⁰ London Borough of Enfield (2016). Local flood Risk Management Strategy: Final Report. <https://new.enfield.gov.uk/services/environment/rivers-and-streams/flood-management/flooding-information-local-flood-risk-management-strategy-2016.pdf>

²¹ Thames Water (2016). What Causes Sewer Flooding. Available at: <https://www.thameswater.co.uk/help-and-advice/drains-and-sewers/sewer-flooding-who-to-contact/what-causes-sewer-flooding>

²² National Grid (2014). 'Staying high and dry': Article outlining risks of flooding to National Grid. <http://nationalgridconnecting.com/staying-high-and-dry/>

²³ Network Rail (no date). How flooding effects the railway. Available at <https://www.networkrail.co.uk/running-the-railway/looking-after-the-railway/delays-explained/flooding/>

²⁴ Values and benefits of heritage: a research review by HLF Strategy & Business Development Department. April 2016

Ecosystem services	Key stakeholders and beneficiaries
<p>Commercial food production is significant in the north of the Park, particularly through the operation of glasshouses.</p> <p>Community food production, through allotments and community gardens, also takes place in the Park.</p>	<p>Riparian Authorities</p> <p>Lea Valley Growers Association</p> <p>Lee Valley Farm</p> <p>Local communities</p>



A scenic view of a pond surrounded by lush green trees and vegetation. The pond is in the center, reflecting the sky and the surrounding greenery. The trees are tall and dense, creating a canopy over the pond. The water is calm, and there are some lily pads visible in the foreground. The overall atmosphere is peaceful and natural.

4 Key Challenges and Opportunities

4 Key challenges and opportunities

- 4.1 As described in section 3, the role of the LVRP as an environmental and recreation resource for London, Hertfordshire and Essex, is now more important than ever. Population growth and development in adjacent boroughs and districts poses significant challenges for the Park, but also presents opportunities to enhance the role and function of the Park.

Financial pressures on the LVRPA

- 4.2 The LVRPA generates around 60% of its expenditure from its own commercial and investment activities. The remainder comes from a levy on council tax payers in Greater London, Essex and Hertfordshire.
- 4.3 However, the Authority is under considerable pressure to reduce the levy, particularly from authorities at some distance from the Park, on the basis that they believe they benefit little from it. They also refer to other regional and sub-regional parks in London that don't have the benefit of funding from a levy.
- 4.4 As part of its medium term financial strategy the Authority in January 2017 approved a levy decrease of 6 per cent for 2017/18. This is the seventh consecutive year the levy has reduced and is significantly below the current rate of inflation. The total amount to be raised by the levy for 2017/18 is £10.2 million. This amounts to 88p per head of population per year in the region (down from 95p in 2016/17).
- 4.5 The Authority aspires to reduce the levy to 25% of the total chargeable amount over the four year period to 2020/21.

Implications of the Authority's Land and Property Strategy

- 4.6 The Authority's Land and Property Strategy seeks to make best use of the Authority's assets and includes proposals for both the disposal and acquisition of land and property within the Park.
- 4.7 This objective, together with the need to achieve the vision for the Park, suggest that planning policies should be seeking to achieve a higher quality and more accessible Park, where development value is secured from land that makes a limited contribution to the objectives of the Park with capital reinvested in further purchases or enhancements in other areas of the Park. The policies will need to **seek to** ensure that any harm caused to the Park through land disposal is minimised and that the benefits are maximised.

Visitor numbers and visitor activities

- 4.8 In the year 2015-16 visitor data there were just over 6.6 million visits to the Lee Valley Park. Although this is a significant number, any projected increases need to be balanced against the more environmentally sensitive areas of the Regional Park.
- 4.9 The majority of visitors come from the riparian authorities. Survey data shows that around two thirds arrive by car, indicating the relative isolation of the Regional Park from main public transport hubs which is to be expected. This suggests there is scope to improve public transport access to the Park. It may also point to the potential to attract more visitors from immediately adjacent communities, who can more readily walk or cycle to the Park.
- 4.10 Half of the visitors were aged 60+. A very small proportion (3%) was aged between 16 and 24. The age profile of other visitors was evenly spread between the age groups in between (see Figure 2.3 in the Evidence Base). While some venues are popular with younger people (e.g. the ice rink), there is significant potential to increase the number of visits by younger people.

- 4.11 Many visits to the Park are for a single purpose, rather than to enjoy the range of facilities and experiences that the Park offers. Of the more than six million visits to the Park in recent years, over four million are to open spaces. However, there is a clear separation between the Park's formal sport / recreation facilities and the wider parkland, with visitors tending to visit one or the other. This suggests a need for an improved offer and the development of venues as 'destinations' with potential for better integration of formal sport / recreation facilities and the wider parkland.
- 4.12 There are conflicts, in some parts of the Park, however, between biodiversity value and people pressures. A key challenge for the Plan is to ensure that policies support increased visitor numbers, whilst also protecting and enhancing biodiversity value or other green infrastructure benefits.
- 4.13 A further challenge of increased visitor numbers is to encourage people to use less frequented areas and avoid exacerbating visitor 'hot spots'.



Walthamstow Wetlands attracts a wide range of visitors of all ages.

Designation of the Park as Green Belt or Metropolitan Open Land

- 4.14 Around 94% of the Park area is designated Metropolitan Open Land or Green Belt, reflecting its importance to the structure of London and the containment of its growth. This presents both an opportunity and a challenge for the Park. **On the one hand Whilst** the designations protect the openness of the Park, **they apply through applying** significant constraint on the type and scale of development that can take place within it.

Green Belt

- 4.15 Para. **133 79** of the NPPF states that 'the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence'.
- 4.16 Para. **145 89** indicates that a local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this include:
- a) *'buildings for agriculture and forestry;*
 - b) ***the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, and-for cemeteries, and burial***

grounds and allotments; as long as **the facilities** ~~it~~ preserves the openness of the Green Belt and **does not conflict with the purposes of including land within it;**

- g) **limited infilling or the partial or complete redevelopment of previously developed *land sites (brownfield-land)*, whether redundant or in continuing use (excluding temporary buildings), which would:**
- **not have a greater impact on the openness of the Green Belt *than and the purpose of including land within it than* the existing development'; or**
 - **not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority'.**

- 4.17 As 'buildings for agriculture', glasshouses are 'not inappropriate' development in the Green Belt. However, large scale glasshouse developments may adversely affect the character and use of the Park unless adequately screened.
- 4.18 The NPPF emphasises in para. **136** ~~83~~ **that local planning authorities should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. It goes on to state** that 'once established, Green Belt boundaries should only be altered **where in** exceptional circumstances **are fully evidenced and justified**, through the preparation or **updating review** of **plans the Local Plan. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.'** ~~At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period'.~~
- 4.19 The LVRPA does not, therefore, define the extent of Green Belt or Metropolitan Open Land; this is for the riparian authorities through the local plan process, with any amendment to the boundary only permitted if 'exceptional circumstances' can be demonstrated. Similarly, planning applications for 'inappropriate development' should not be approved except in very special circumstances. Para. **144** ~~88~~ indicates that 'very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations Alternatively, applicants for planning permission can seek to demonstrate the 'special circumstances'.
- 4.20 The NPPF states that "**Once Green Belts have been defined**, local planning authorities should plan positively to enhance their beneficial use, ~~of the Green Belt,~~ such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land" (Para. **141** ~~81~~).
- 4.21 As part of its recent White Paper on housing policy, the government has proposed that local authorities should seek to 'offset' the removal of land from the Green Belt by way of 'compensatory improvements to the environmental quality or accessibility of remaining Green Belt land'. This could be achieved through legal agreements in conjunction with the release of land and planning consent for development.²⁵
- 4.22 This positive role of the Green Belt is also reflected in the London Plan, which states 'Green Belt has an important role to play as part of London's multifunctional green infrastructure and the Mayor is keen to see improvements in its overall quality and accessibility. Such improvements are likely to help human health, biodiversity and improve overall quality of life. Positive management of the Green Belt is a key to improving its quality and hence its positive benefits for Londoners' (para 7.55).

²⁵ *Fixing our broken housing market* Presented to Parliament by the Secretary of State for Communities and Local Government by Command of Her Majesty, February 2017

- 4.23 There is a clear opportunity for the Park to play a significant role in enhancing the Green Belt in partnership with the riparian authorities linked to the delivery of its Land and Property strategy.

Metropolitan Open Land

- 4.24 The overriding purpose of MOL policy is to preserve strategic open land within the urban area that contributes to the structure of London. The criteria are set out in the London Plan and listed in the box below.

Criteria for MOL designation

- land that contributes to the physical structure of London by being clearly distinguishable from the built-up area
- land that includes open air facilities, especially for leisure, recreation, sport, arts and cultural activities and tourism which serve the whole or significant parts of London
- land that contains features or landscapes of historic, recreational, nature conservation or habitat interest, of value at a metropolitan or national level
- land that forms part of a Green Chain and meets one of the above criteria.

- 4.25 MOL is afforded the same level of protection as Green Belt, with the London Plan noting that incompatible development should be refused except in very special circumstances. The general extent of the boundary supported by the Mayor and, as with Green Belt, the London Plan indicates that MOL has an important role to play as part of London's multifunctional green infrastructure (para. 7.56). The positive and strategic role of MOL in providing recreational opportunities and for nature conservation (amongst other uses) is more explicit in the criteria for designation. The draft new London Plan gives increased emphasis to improving access to MOL.
- 4.26 ~~The LVRP is in many ways an exemplar of MOL policy. However, as with Both MOL and Green Belt, the designations presents challenges to the Authority in terms of how the bringing forward some types of development is brought forward. that furthers the Park's own interests.~~

Development pressures close to and within the Park

- 4.27 Considerable development is already planned adjacent to the Park; for example at Poplar, Lea Bridge, Blackhorse Lane, Meridian Water and Ponders End. Other sites for major residential development are identified within draft Local Plans at Ware in East Herts DC and Cheshunt in Broxbourne borough. The Park is also impacted by major infrastructure projects such as upgrades to waste treatment works and energy sub stations and most recently by plans for Crossrail 2.
- 4.28 The draft new London Plan anticipates further housing growth in all London Boroughs, which will lead to higher densities and potentially medium rise and tall buildings which will affect the setting of the Park.
- 4.29 Although the London Plan and Local plans will continue to afford strong protection of land designated as MOL or Green Belt, there will continue to be pressures for development. The Authority will respond to these pressures through the Local Plan process seeking to object or where it considers that sites have little value to achieving its statutory purpose and that a capital receipt generated from part or full disposal can be put to good effect in securing investment in the parklands and venues.
- 4.30 Such development has the potential to adversely affect the Park's natural and ~~historic heritage~~ **historic heritage** assets and their wider setting **particularly given the complexity of the Park's strategic and interconnected network of habitats and the multi-layered and diverse heritage resource. in the Park.** However, new development provides opportunities to make improvements to the Park; for example by enhancing and creating new entrance points along its boundaries, **replacing old structures with new well-designed buildings**, conserving and enhancing the setting of **historic heritage** assets, **as well as revealing significance** ~~replacing old structures with new and well-designed buildings~~ and incorporating planting

and habitats within the development site that complement the Park. **Development may also provide the opportunities to address Heritage at Risk.** The Queen Elizabeth Olympic Park demonstrates this potential in a rather special way given the scale and nature of the development.

- 4.31 The Lea River Park will connect Queen Elizabeth Olympic Park to the Royal Docks and the River Thames, thereby providing the missing link between the Park and the Thames. The first phase is the delivery of a linear park, the 'Leaway', which creates a continuous walking and cycling route along the River Lea and connects a series of existing but fragmented public open spaces. With further funding from adjacent development new parks and additional pedestrian and cycle connections will be provided.
- 4.32 Development around the Park is likely to bring increased visitor pressure to the Park. While this has many benefits, careful management will be required to prevent disturbance to the Special Protection Area and other habitats. This underlines the need to ensure that sufficient local play and amenity space is provided in adjacent developments.



Large-scale agriculture and industrialisation of the landscape

- 4.33 Large-scale agriculture within the rural-urban fringe is increasingly challenging as a result of fragmentation of the landscape and management issues. At the same time there is considerable demand for glasshouses²⁶ and smaller-scale sustainable food production including allotments and community growing initiatives²⁷. The growth of glasshouses and smaller-scale producers creates local economic benefits. However, glass houses can detract from landscape benefits such as openness, natural character, and green open space.²⁸

²⁶ Lee Valley Growers Association (no date). Article currently illustrating demand for glasshouses. <http://www.lvga.co.uk/lea-valley-growers-win-national-awards/the-future-of-the-lea-valley-glasshouse-industry/>

²⁷ Making Local Food Work (2012) Food from the urban fringe: Issues and opportunities. Available at <http://www.localfood.org.uk/Food-from-the-Urban-Fringe.pdf>

²⁸ Lee Valley Regional Park Authority (2000). Lee Valley Regional Park Plan: Part 2: Strategic Policy Framework p47

Habitat conservation and enhancement

- 4.34 Increased visitor pressures could in turn affect the Park's biodiversity resource. Planning can play a role in diverting these pressures to less sensitive areas and in securing funding for the management of habitats. The Park can also help to address deficiencies in 'access to nature' in the wider areas. This will require an integrated approach to conservation at a landscape scale.
- 4.35 The concept that development proposals should minimise their impact on biodiversity and deliver a 'net gain' in biodiversity (NPPF para 170 109) is supported by the riparian authorities and is being incorporated into local plan policy as Local Plans are revised. This policy context is an important mechanism to improve habitat conservation and restoration within the Park and along its boundaries.
- 4.36 Furthermore the Park could become a 'receptor site' for biodiversity off-setting²⁹. Biodiversity offsets are measurable conservation outcomes resulting from actions designed to compensate for residual adverse biodiversity impacts arising from a development. The Mayor's draft Environment Strategy 2017 indicates that the Mayor will work with boroughs, statutory agencies and wildlife organisations to explore the opportunities to establish a new biodiversity offsetting metric for London.

Accessibility and way marking

- 4.37 Although access to the Park by rail, London Underground and DLR is generally good, evidence suggests that visitors by rail make up a very small proportion of journeys to the Park. The proposed four-tracking between Coppermill Junction and Broxbourne Junction will increase the frequency of services which should make visits by rail more attractive.
- 4.38 Routes into the Park from the main stations such as Broxbourne, Cheshunt and Tottenham Hale are well established but more work is needed to waymark and highlight this means of visiting the Park. Some of the smaller stations such as Ware, Roydon, Lea Bridge also require improved route provision and signage.
- 4.39 The accessibility of the Park is limited by the number of entrance points for pedestrians and cyclists. In many areas accessibility is hindered by the severance effect of linear infrastructure, including roads, railways and waterways. **Unless carefully designed, the Crossrail 1 extension and Crossrail 2 could increase these severance effects. Transport for London acknowledge that Crossrail 2 should aim to reduce severance and joint working will be required to secure this.**
- 4.40 As well as better way marking and crossing points over linear infrastructure, improvements to the quality and attractiveness of access points to the Park would help to enhance visitor numbers and the visitor experience. **The principle cycling route, which covers almost the entire length of the Park is the national Cycle Route NCN route 1, which becomes NCN61 for the northernmost section of the Park. For the most part it is on traffic free routes providing access to a wide range of sites and venues within the Park and linking in with other routes. Important to visitors this route together with the other walking and cycling routes also play a role in making active travel accessible and appealing to residents of north east London and Hertfordshire.**

²⁹ Biodiversity offsetting is a system used predominantly by planning authorities and developers to fully compensate for biodiversity impacts associated with economic development, through the planning process. In some circumstances, biodiversity offsets are designed to result in an overall biodiversity gain. Offsetting is generally considered the final stage in a mitigation hierarchy, whereby predicted biodiversity impacts must first be avoided, minimised and reversed by developers, before any remaining impacts are offset. Individuals or companies involved in arranging biodiversity offsets will use quantitative measures to determine the amount, type and quality of habitat that is likely to be affected by a proposed project. Then, they will establish a new location or locations (often called receptor sites) where it would be possible to re-create the same amount, type and quality of habitat.



Water resources, flood mitigation and climate change

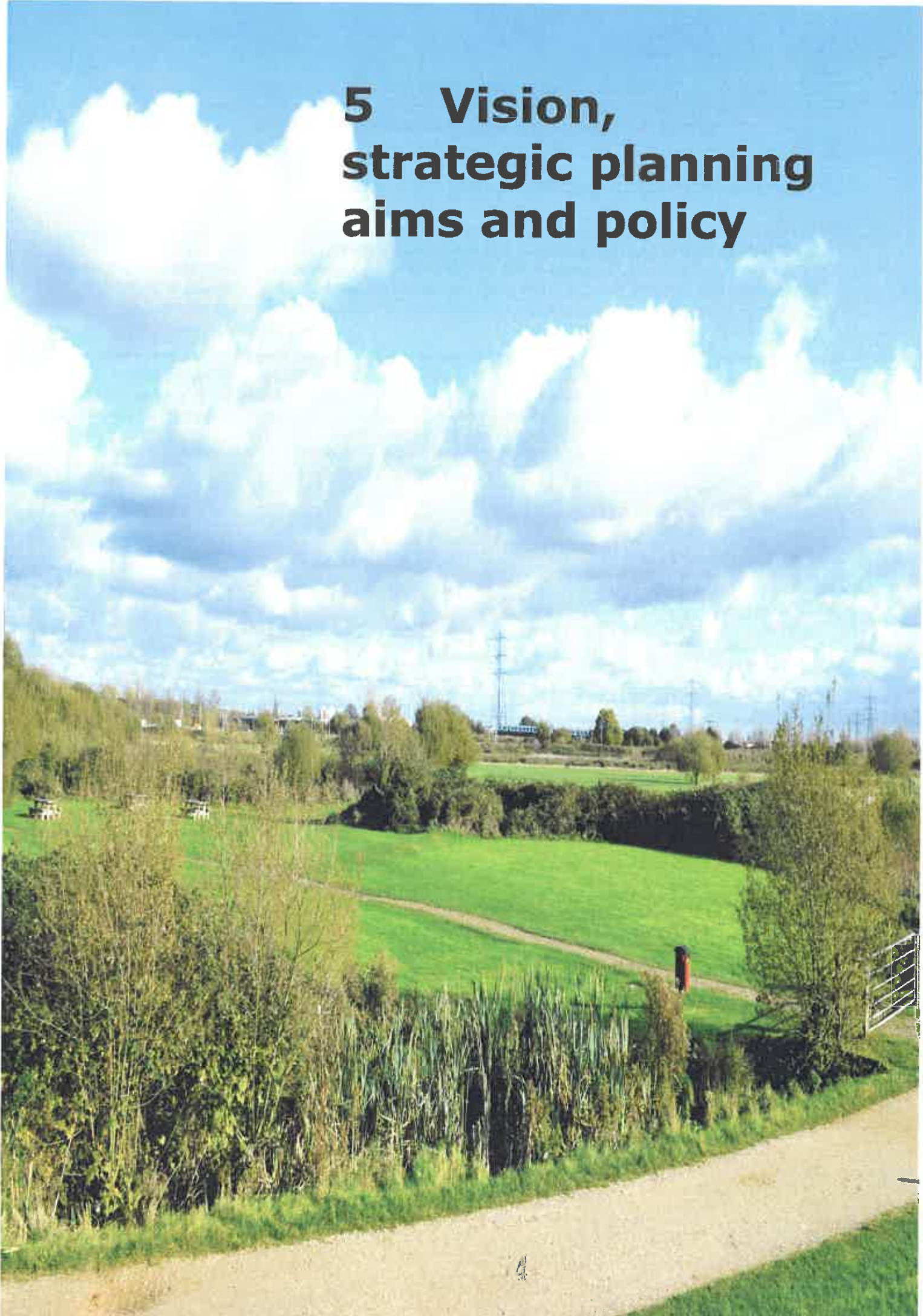
- 4.41 The Lee Valley Park is an important resource for capturing and draining floodwater. Natural elements of the Park, such as the natural river channels, soils and marshes retain floodwater by soaking up and storing excess water during periods of heavy rainfall.
- 4.42 Floodwater is also retained as surface water in the man-made lakes, reservoirs and other artificial channels, specifically the Lee Navigation, Flood Relief Channel (FRC). A system of weirs and sluices along these waterways help to reduce floodwater down stream and maintain river flows in drier periods as water is released more slowly from wetland habitats. However, these flood defences almost reached full capacity in 1987, 1993 and 2000 with approximately 63% of the Park classified as being prone to flooding (Flood Zone 2 or above).
- 4.43 Significant changes in rainfall and run-off in recent years as a result of increased development of open land within the catchment and the effects of climate change has increased flood risk by an estimated 3.3% in parts of the Park. This trend is likely to continue as climate change continues and development pressures in and around the Park expand the area of impermeable surfaces. As such, a priority for the Park is to contribute to the mitigation of flood risk in the Park.
- 4.44 As well as draining and managing floodwaters, the Park's waterbodies are important for water abstraction, water supply and effluent discharge. There continues to be concern that effluent discharge from sewage treatment works at Rye Meads in Hoddesdon and Deephams in Edmonton reduces the water quality of nearby waterways. In addition over-abstraction of water in relation to the thirteen major reservoirs that occupy the Lower Lee Catchment and water treatment works located at Coppermill can significantly reduce water levels in river channels, thereby having adverse effects on water quality and biodiversity. The risk of over-abstraction is likely to continue as London, Hertfordshire and Essex's populations increase and climate change poses the risk of warmer drier weather. **Other challenges, likely to come from areas surrounding the Park include diffuse source pollution from urban runoff, pollution incidents, industrial discharges and other point source pollution such as drainage misconnections. These**

pressures for the water environment combine to create challenges for the EA and other stakeholders in seeking to achieve Good Ecological Status for the waterbodies in accordance with the Thames River Basin Management Plan (2015)

Improving health and well-being

- 4.45 The Park is an important asset for promoting health and well-being for neighbouring communities and those visiting from further afield. The Park's green infrastructure provides a setting for contact with nature and informal recreation whilst the Park's built sports venues and educational facilities also promote physical activity and mental wellbeing. Health and wellbeing in the Park is reinforced by sport and cultural events, volunteering, educational programmes and health initiatives.
- 4.46 Improving the quantity and range of access routes into the Park will help to ensure that more people are able to benefit. Improving the range and quality of sport, recreation and cultural facilities and services in the Park will attract more people to visit and benefit. Addressing a lack of perceived personal safety in less managed or unkempt areas that suffer from a lack of natural surveillance will encourage more people to visit and stay longer.

5 Vision, strategic planning aims and policy



5 Vision, aims and strategic policies

Vision and strategic planning aims

- 5.1 The Park's adopted overall vision is to be 'a world class leisure destination'. To help achieve this vision, the Park Development Framework's strategic policies seek to improve the quality and accessibility of the Park's sport and leisure facilities and the wider parkland setting. The planning policy context and evidence base highlight the importance of the Park as a multifunctional green infrastructure resource for London, which should be conserved and enhanced.
- 5.2 A higher quality 'offer' will provide an attractive setting for new development within and adjacent to the Park. It will also help to attract more visitors to the Park, which in turn will provide on-going funding opportunities through local income sources. Improving the use and function of land within the Park will also assist the riparian authorities in meeting their obligations and aspirations to improve land in the Green Belt and MOL. Adverse impacts associated with increased visitor numbers on biodiversity and tranquillity will be addressed by 'spreading the load' – ensuring that the number and quality of access points and focal points is increased.

Strategic planning aims

- 5.3 The strategic planning aims are set out below. Drawing on the evidence base and the spatial portrait, they are designed to address the key challenges facing the Park, manage development pressures and realise opportunities to enhance the Park.
- Ensure the effective use and management of land.
 - Conserve and enhance the Park's landscape character, key views and openness.
 - Conserve and enhance the cultural heritage of the Park and its historic environment.
 - Conserve and enhance the Park's biodiversity.
 - Protect, **improve** and make best use of the Park's water spaces.
 - Increase the attractiveness and use of the Parkland and venues **to support the health and wellbeing of visitors from all communities**.
 - Influence major new development within and adjacent to the Park to ensure that the Park is protected and enhanced.
 - Improve accessibility and entrances to the Park for pedestrians and cyclists and via public transport.
 - **Protect and enhance the Park's contribution to reducing and managing flood risk**

Strategic policies

- 5.4 The strategic policies in relation to each of the aims are set out below. The Authority will apply the policies to guide development and land use change within and adjacent to the Park in collaboration with the Riparian Authorities. The policies will therefore provide greater certainty for developers and landowners and help the LVRPA in its role as a statutory consultee on development plans and planning applications. The policies will also inform the Park's own Area Proposals and any development within or outside these areas put forward by the Authority itself.

Effective use and management of land

- 5.5 ~~The Park Authority will:~~

E1: Work with landowners **and key stakeholders** across the Regional Park to ensure:

- a) the most effective use of land and property in fulfilment of its statutory purpose; **and**
- b) **that development proposals take into consideration the Natural Capital Accounting Framework.**

E2: Development proposed on sites either within or outside the Park which could adversely impact on its amenity will be resisted or planning obligations sought in line with other policies within this Plan.

Conserve and enhance the Park's landscape character, key views and openness

5.6 ~~The Park Authority will:~~

~~L1: Require **all** development proposals to demonstrate how their location, scale, design and materials **respect and respond to the character, sensitivities and qualities of the relevant landscape character areas, as detailed in the Landscape Character Assessment (LCA).** will conserve and enhance the Park's local distinctiveness, in particular:~~

- ~~• Rural wetlands, woodlands and agricultural river pastures~~
- ~~• Urban reservoirs, leisure facilities, historic gardens and post industrial parks~~

~~L2: Require development proposals to demonstrate how they respect and respond to the character, key sensitivities and qualities of the relevant landscape character areas, as detailed in the Landscape Character Assessment (LCA):~~

~~L3: Ensure that landscape design at existing and new gateways to the Park and associated with new development reflects the Park's semi-natural character.~~

~~L2 4: Secure designs of new buildings and other structures which are appropriate to their landscape context as identified in the draft Landscape Character Assessment.~~

~~L3 5: **Require full landscape and visual assessments to be made of all proposals for tall buildings for sites both within and adjacent to the Park. Resist tall buildings within the Park and consider the impacts of proposed tall buildings adjacent to the Park, in light of a full landscape and visual impact assessment.**~~

~~L4 6: Protect views that promote a sense of orientation and/or an appreciation of the natural and physical environment of the Lee Valley.~~

~~L7: **Protect the openness of the Park, which is predominantly designated as Green Belt or Metropolitan Open Land.**~~

Conserve and enhance the cultural heritage of the Park and its historic environment

5.7 ~~The Park Authority will:~~

~~H1: Conserve and enhance the Park's **historic environment and** cultural heritage, including its archaeology, historic buildings, **and** structures, **landscapes** and their settings.~~

~~H2: Support proposals to enhance access to and interpret heritage assets, recognising their value in providing opportunities for leisure, health and recreation.~~

~~H3: Work with other **partner** bodies to support art, festivals and fairs.~~

Conserve and enhance the Park's biodiversity

5.8 ~~The Park Authority will:~~

~~B1: **Development within the Regional Park should be consistent with the Authority's Biodiversity Action Plan and in accordance with a locally approved or DEFRA endorsed biodiversity assessment metric. Protect and enhance the Park's statutorily designated nature conservation sites.**~~

~~B2: **Restore, improve and conserve the Park's wider range of habitats and species.**~~

~~B3: **Recreate and improve connectivity between habitats and landscape features within and adjacent to the Park.**~~

B2 4: Proposals that could result in a net loss of biodiversity will be resisted. Where necessary the Authority will seek planning obligations to deliver the 'mitigation hierarchy' of avoidance, mitigation and compensation. Ensure development proposals within the Park achieve a net gain in natural capital, including net gains in biodiversity.

~~B5: Secure new and enhanced entrance points to the Park in order to divert visitor pressures away from and manage the sensitivities of habitats and species.~~

~~B3 6: Secure compensatory measures for adverse biodiversity impacts which cannot be mitigated, secured by planning obligations and undertakings and agreements under Section 27 of the Lee Valley Regional Park Act 1966. Work with the riparian boroughs and the London Mayor to identify locations within the Park which can provide opportunities for on a suitable approach to 'biodiversity offsetting', with the park providing 'receptor sites' resulting from major development schemes proposed for sites outside the Park.~~

B4: Regularly monitor the Park's protected sites and species in line with the adopted Lee Valley Biodiversity Action Plan.

Protect, improve and make best use of the Park's water spaces

5.9 ~~The Park Authority will:~~

W1: Ensure that existing water bodies are appropriately protected to support the Regional Park's biodiversity and recreational offer.

W2: Support development that encourages recreational use of water spaces, where this is consistent with other strategic policies.

W3: Ensure that existing water bodies are protected and enhanced compliant with the objectives of the Thames River Basin Management Plan.

Increase the attractiveness and use of the parkland and venues to support the health and wellbeing of visitors from all communities

5.10 ~~The Park Authority will:~~

V1: Bring land into park related uses and resist the development of non-Park related uses unless they can make a significant contribution to the Authority's statutory purpose.

~~V2: Building on the Regional Park's great sporting legacy, continue to develop an event programme of international and national status. Continue to develop an event programme of international and national status which reflects the Regional Park's significant leisure and sporting offer.~~

V3: Work with stakeholders to promote and enhance existing sports facilities. Support site and venue development sympathetic to the wider parklands. that integrates sporting venues with the wider parklands to support a diverse visitor offer.

V4: Support the provision of appropriate visitor / education facilities at existing and new visitor hubs and entrance points to the Park.

Influence major new development within and adjacent to the Park to ensure that the Park it is protected and enhanced

5.11 ~~The Park Authority will:~~

D1: Work in partnership with the riparian authorities on Green Belt and Metropolitan Open Land reviews and policy development, with a view to protecting open land around the Park, while meeting development aspirations:

D2: Ensure that development proposed within the Park is of the highest environmental standards.

D3 2: Work in partnership with riparian councils to ensure that the nature **design and layout** of new development on sites both within **the Regional Park** and adjacent to its boundary:

- a) enhances the **Regional Park in line with its draft strategic policies and avoids** detrimental impact on **its** protected ecological and heritage assets; and
- b) **provides sufficient open space to cater for the informal recreational needs arising from the development, including areas for play and for dog walking.**

~~**D3: Support development that is consistent with other strategic policies, particularly recreational, leisure and sporting facilities.**~~

~~**D4: Secure funding for Park improvements through the riparian authorities' planning obligations.**~~

D4: Working with the London Mayor and riparian Boroughs/Districts explore opportunities to designate sites within the Park to allow access to natural green space designed to offset adverse impacts of new development on the Epping Forest SAC.

Improve accessibility and entrances to the Park for pedestrians and cyclists and via public transport.

5.12 The Park Authority will:

A1: Enhance existing entrances to the Park and, where appropriate, create new entrances.

A2: Work in partnership to reduce the severance caused by linear infrastructure, through the creation of pedestrian and cycle bridges and crossing points.

A3: Work in partnership to secure physical links and green corridors to surrounding parks, open spaces and other points of interest, thereby improving accessibility and integration.

A4: Improve **sustainable transport** links between points of interest within the Park.

A5: Enhance signage and way finding to improve access to and movement within the Park.

A6: Respond to the diversity of need enabling access to the Park by all communities.

Protect and enhance the Park's contribution to reducing and managing flood risk

5.13 The Park Authority will:

FR1: Work with the Environment Agency and others to protect the function of the Lee Flood Relief Channel

FR2: Enhance the Park's contribution in mitigating and reducing flood risk to the surrounding areas, by natural flood management and sustainable drainage measures and by supporting SUDs where appropriate

FR3: Increase the ability of the park and surrounding areas to adapt to climate change and its impact on flood risk by promoting green infrastructure.

Appendix B: Clean copy of Strategic Policies incorporating changes following consultation, Panel discussion and Officer amendments.

Policy Ref.	Policy
Aim	Effective use and management of land
Policy	
E1	Work with landowners and key stakeholders across the Regional Park to ensure: a) the most effective use of land and property in fulfilment of its statutory purpose; and b) that development proposals take into consideration the Natural Capital Accounting Framework.
E2	Development proposed on sites either within or outside the Park which could adversely impact on its amenity will be resisted or planning obligations sought in line with other policies within this Plan.
Aim	Conserve and enhance the Park's landscape character, key views and openness
Policy	
L1	Require all development proposals to demonstrate how their location, scale, design and materials respect and respond to the character, sensitivities and qualities of the relevant landscape character areas, as detailed in the Landscape Character Assessment (LCA).
L2	Secure designs of new buildings and other structures which are appropriate to their landscape context as identified in the draft Landscape Character Assessment.
L3	Require full landscape and visual assessments to be made of all proposals for tall buildings for sites both within and adjacent to the Park.
L4	Protect views that promote a sense of orientation and/or an appreciation of the natural and physical environment of the Lee Valley.
Aim	Conserve and enhance the cultural heritage of the Park and its historic environment
Policy	
H1	Conserve and enhance the Park's historic environment and cultural heritage, including its archaeology, historic buildings, structures, landscapes and their settings

H2	Support proposals to enhance access to and interpret heritage assets, recognising their value in providing opportunities for leisure, health and recreation.
H3	Work with other partner bodies to support art, festivals and fairs.
Aim	Conserve and enhance the Park's biodiversity
Policy	
B1	Development within the Regional Park should be consistent with the Authority's Biodiversity Action Plan and in accordance with a locally approved or DEFRA endorsed biodiversity assessment metric.
B2	Proposals that could result in a net loss of biodiversity will be resisted. Where necessary the Authority will seek planning obligations to deliver the 'mitigation hierarchy' of avoidance, mitigation and compensation.
B3	Work with the riparian boroughs and the London Mayor to identify locations within the Park which can provide opportunities for 'biodiversity offsetting', resulting from major development schemes proposed for sites outside the Park.
B4	Regularly monitor the Park's protected sites and species in line with the adopted Lee Valley Biodiversity Action Plan.
Aim	Protect improve and make best use of the Park's water spaces
Policy	
W1	Ensure that existing water bodies are appropriately protected to support the Regional Park's biodiversity and recreational offer.
W2	Support development that encourages recreational use of water spaces, where this is consistent with other strategic policies.
W3	Ensure that existing water bodies are protected and enhanced compliant with the objectives of the Thames River Basin Management Plan.
Aim	Increase the attractiveness and use of the parklands and venues to support the health and well being of visitors from all communities
Policy	
V1	Bring land into Park related uses and resist the development of non-Park related uses unless they can make a significant contribution to the Authority's statutory purpose.
V2	Continue to develop an event programme of international and national status which reflects the Regional Park's significant leisure and sporting offer.

V3	Work with stakeholders to promote and enhance existing sports venues. Support site and venue development sympathetic to the wider parklands.
V4	Support the provision of appropriate visitor / education facilities at existing and new visitor hubs and entrance points to the Park.
Aim	Influence major new development within and adjacent to the Park to ensure that it is protected and enhanced
Policy	
D1	Work in partnership with riparian authorities on Green Belt and Metropolitan Open Land reviews and policy development, with a view to protecting open land around the Park, while meeting development aspirations.
D2	Ensure that development proposed within the Park is of the highest environmental standards.
D3	Work in partnership with riparian councils to ensure that the design and layout of new development on sites both within the Regional Park and adjacent to its boundary: a) Enhances the Park, avoiding detrimental impact on its ecological and heritage assets, and b) provides sufficient open space to cater for the informal recreational needs arising from the development including areas for play, and for dog walking
D4	Working with the London Mayor and riparian Boroughs/Districts explore opportunities to designate sites within the Park to allow access to natural green space designed to offset adverse impacts of new development on the Epping Forest SAC.
Aim	Improve accessibility and entrances to the Park for pedestrians and cyclists and via public transport
Policy	
A1	Enhance existing entrances to the Park and, where appropriate, create new entrances.
A2	Work in partnership to reduce the severance caused by linear infrastructure, through the creation of pedestrian and cycle bridges and crossing points.
A3	Work in partnership to secure physical links and green corridors to surrounding parks, open spaces and other points of interest, thereby improving accessibility and integration.
A4	Improve sustainable transport links between points of interest within the Park.

A5	Enhance signage and way finding to improve access to and movement within the Park.
A6	Respond to the diversity of need enabling access to the Park by all communities
Aim	Protect and enhance the Park's contribution to reducing and managing flood risk
Policy	
F1	Work with the Environment Agency and others to protect the function of the Lee Flood Relief Channel.
F2	Enhance the Park's contribution in mitigating and reducing flood risk to the surrounding areas, by natural flood management and sustainable drainage measures, and by supporting SUDs where appropriate.
F3	Increase the ability of the Park and surrounding areas to adapt to climate change and its impact on flood risk by promoting green infrastructure.

ID No.	Organisation name or Individual	Doc Ref: SP for Strategic Policies or SEA or HRA or EvB	Policy Ref	Para no.	Consultee Comments	LVRPA Response	Proposed amendments
P LA3.0	EFDC	SP			<p>The Council welcomes many of the policies and proposals contained within the draft amended Park Development Framework and notes the amendments made in respect of concerns raised in February 2015 to an earlier draft of the Area Proposals. Please see attached the background report and formal Portfolio Holder decision which sets out the Council's formal response to the consultations above.</p>	<p>Comments noted [This is an overarching comment which applies also to Area Proposals]</p>	<p>No change</p>
P LA3.1	EFDC				<p>1. This report outlines the current proposals from the LVRPA followed by a synopsis of the Councils earlier response to a previous consultation and the manner in which the LVRPA dealt with this response. The report then gives a view of the current proposals including matters of concern. 2. The Regional Park and the Regional Park Authority were established by the Lee Valley Regional Park Act 1966. The Authority is required by statute to encourage or work with others to provide and manage facilities for "leisure, recreation, sport, games or amusements or any other similar activity, the provision of nature reserves and for the provision and enjoyment of entertainments of any kind": While it is not a planning authority, there is also a duty to prepare plans for the management and development of the Park. Under section 14 (2) (a) of the 1966 Act, a local planning authority must include in its development plan relevant parts of the Park Plan. Section 14 (2) (b) clarifies that such inclusion "shall not be treated as indicating the approval of the planning authority to such plan": The most recent Park Plan was adopted in 2000 and the Park Development Framework (PDF) is intended to replace it.</p>	<p>Noted</p>	<p>No change</p>
P LA3.2	EFDC	SP			<p>Strategic Policies "The Lee Valley Regional Park Strategic Planning Evidence and Policies - Park Plan Part 1 Strategic Policies" February 2018 are intended "to guide the development and land use change within and adjacent to the Park in collaboration with the Riparian Authorities. The policies will therefore provide greater certainty for developers and landowners and help the L VRPA in its role as a statutory consultee on development plans and planning applications. The policies will also inform the Park's own Area Proposals and any development within or outside these areas put forward by the Authority itself (paragraph 1.4).</p>	<p>Noted</p>	<p>No change</p>

P LA3.3	EFDC	SP	4.1 - 4.46	<p>The document sets out a great deal of context, a spatial portrait and a section on key challenges and opportunities which are regarded as: a. Financial pressures. b. Visitor numbers and activities. c. Designation of the Park as Green Belt or Metropolitan Open Land - including the challenge to bring forward development that furthers the Park's own interests. d. Development pressures close to and within the Park - including the need for careful management to prevent disturbance to the SPA and other habitats underpinning the need to ensure that sufficient local play and amenity space is provided in adjacent developments. e. Large scale agriculture and industrialisation of the landscape - including that whilst they bring benefits glasshouses can detract from landscape benefits such as openness, natural character and green open space. <i>continued below</i></p>	Noted	No change
P LA3.4	EFDC	SP	4.1 - 4.46	<p>f. Habitat conservation and enhancement - including the suggestion that the Park could become a receptor for biodiversity offsetting. g. Accessibility and way marking - including the limited number of current access points and the severance effects of railways. h. Water resources, flood mitigation and climate change - the Park being a key resource for flood management and water storage. i. Improving health and wellbeing - including improving the number of people with access to the park, the facilities within it and the management of unkempt areas. The Park's adopted vision is to be 'a world class leisure destination' and the strategic policies seek to improve the quality and accessibility of the Parks sport and leisure facilities and the wider parkland setting. It highlights the role as "a multifunctional green infrastructure resource for London, which should be conserved and enhanced</p>	Comments noted	No change
P LA3.5	EFDC	SP	5.3	<p>The strategic planning aims are: • Ensure the effective use and management of land. • Conserve and enhance the Park's landscape character, key views and openness. • Conserve and enhance the cultural heritage of the Park and its historic environment. • Conserve and enhance the Park's biodiversity. • Protect and make best use of the Park's water spaces. • Increase the attractiveness and use of the Parkland and venues. • Influence major new development within & adjacent to the Park to ensure that the Park is protected and enhanced. • Improve accessibility and entrances to the Park for pedestrians and cyclists and Q via public transport. There are strategic policies under each of these aims are reproduced at Annex 1 of this report for ease of reference.</p>	Noted	No change
P LA3.6	EFDC	SP		<p>Overall Comments. All of the strategic policies are relevant to the functions and aspirations of the District Council and on the whole they chime with the aspirations and policies of the EFDC Local Plan Submission Version 2017. In particular support to tourism and visitors to the District and the protection of biodiversity and heritage are particularly valued by the Council.</p>	Comments and support noted	No change

P LA3.7	EFDC	SP	L5, L6	<p>The Council appreciates the efforts made to resolve some of the concerns expressed previously through amendments to the framework proposals. However with respect to the current proposals there remain matters where there may be conflicts in the implementation of policy objectives between the LPA and LVRPA.</p> <p>First with regard to Strategic Policies L5 and L6 i.e. 'L5: Resist tall buildings within the Park and consider the impacts of tall building adjacent to the Park, in light of a full landscape and visual impact assessment' and 'L6 Protect views that promote a sense of orientation and/or an appreciation of the natural and physical environment of the Lee Valley'.</p>	<p>Comments noted. Policies L5 and L6 apply across the Park and are informed by the Landscape Character Assessment. They will be applied judicially and are aimed primarily at large scale residential development that will impact the Park, and which is becoming a feature of certain areas of land on the boundary of the Park. Detailed Area Proposals provide a more site specific response in relation to those areas of the Park where glasshouse developments are located.</p>	<p>No change</p>
P LA3.8	EFDC	SP	L5, L6	<p>The primary concern in this respect is the potential impact on protected horticulture in the District since modern glasshouse development is indeed tall. The Park currently contains glasshouses and they also sit on the Park boundary. EFDC will consider proposals within the context of its own planning policies and it has been proven through case law that the openness of the Green Belt is not a material factor in respect of horticulture in the Green Belt. An appeal against the findings of a Judicial Review of Valley Growth Nurseries 1 application requested by the Lee Valley Regional Park Authority has clarified this issue in relation to glasshouse development and concluded that because agricultural development is not inappropriate development as such it cannot be harmful to the openness of the Green Belt. Maintaining the openness of the Park is unlikely to be considered so material as to outweigh the need for food production. Whilst there are outstanding objections to the LPSV "Policy E 3 Food Production and Glasshouses", the Council seeks to support the industry through its planning policies to expand and thrive and indeed has taken a more relaxed approach to location in the LPSV than in previous Local Plans.</p>	<p>Comments noted. The policy, D1 is worded to highlight the importance of working with the riparian authorities in relation to the green belt and MOL and development proposals. The Council raised concerns to Area 6 proposals during the previous round of consultation, in terms of development within the District but without mentioning any specific sites. Area 6 proposals refer to improved provision for sport (sailing, angling) and visitor facility development (at River Lee Country Park), all of which would be progressed through the planning system with due regard to the green belt and other designations.</p>	<p>Note revisions to Policy L5 which is now renumbered as L3 - refer to detail below. Also L6 now becomes L4. L3 Revised L3 as follows: Require full landscape and visual assessments to be made of all proposals for tall buildings for sites both within and adjacent to the Park. Resist tall buildings within the Park and consider the impacts of proposed tall buildings adjacent to the Park, in light of a full landscape and visual impact assessment.</p>
P LA3.9	EFDC	SP	D1	<p>In addition, the key set of policies supporting the aim "to influence major new development within and adjacent to the Park to ensure that the Park is protected & enhanced" are greeted with caution as follows:</p> <p>a. In respect of "D1 Work in partnership with the riparian authorities on Green Belt and Metropolitan Open Land reviews and policy development, with a view to protecting open land around the Park, while meeting development aspirations". It should be noted that it is incumbent upon EFDC to operate national Green Belt policy in consideration of built facilities in the Park. The level of built facilities proposed in the Green Belt was a matter of concern raised in 2015 in respect of Area Proposals that does not appear to have been addressed in this version of the PDF.</p>	<p>Comments noted. The policy, D1 is worded to highlight the importance of working with the riparian authorities in relation to the green belt and MOL and development proposals. The Council raised concerns to Area 6 proposals during the previous round of consultation, in terms of development within the District but without mentioning any specific sites. Area 6 proposals refer to improved provision for sport (sailing, angling) and visitor facility development (at River Lee Country Park), all of which would be progressed through the planning system with due regard to the green belt and other designations.</p>	<p>No change</p>

P LA3.10	EFDC	SP	D2	<p>b. With regard to "D2 Work in partnership with riparian councils to ensure the nature of new development on site both within and adjacent to its boundary enhances the Regional Park in line with its draft strategic policies and avoids detrimental impact on protected ecological and heritage assets". Naturally the Council supports the aim of avoiding detriment to ecological and heritage assets, however, the approach should not be used to stifle the viability and vitality of existing commercial uses in the Park and adjacent to its boundaries in line with allocations for employment use in the EFDC LPSV and with regard to the glass house industry.</p>	<p>The landscape quality and character of the Park, its heritage and ecological assets, many of which are formally protected are a key reason why people visit and enjoy the Park. The heritage and ecological aspects are an intrinsic part of the Park's landscape adding value to adjoining residential and business areas. Policy seeks to ensure these values are both protected and enhanced through new development.</p>	<p>No change as a result of these comments but note that D2 is renumbered as D3 and has been amended in response to other comments - see LA5.1 for example.</p>
P LA3.11	EFDC	SP	D4	<p>In addition, "D4 Secure funding for Park Improvements through the riparian authorities' planning obligations". The Council has not discussed the possibility of this matter with the LPSV although this has been raised in Representation to the LPSV. It is unlikely that, given the other requirements to provide infrastructure and mitigation on European Sites, that there will be any significant financial gain from planning obligations agreed in the District that would finance the LVRPA activities beyond the matter of biodiversity protection.</p>	<p>Comments noted, the Authority is party to the cross boundary discussions within the region being led by EFDC and work to produce a mitigation strategy in relation to the European Sites. Visitor pressure on the Lee Valley SPA raises similar issues that will require mitigation via planning obligations or similar. However policy D4 has been deleted, and replaced with a new policy specific to the Epping Forest SAC and which deals with comments made by Natural England.</p>	<p>No change but note that D4 has been deleted and replaced with the following policy: D4 Working with the London Mayor and riparian Boroughs/Districts explore opportunities to designate sites within the Park to allow access to natural green space designed to offset adverse impacts of new development on the Epping Forest SAC.</p>
P LA4.0	Essex CC Spatial Planning			<p>Essex County Council welcomes many of the policies and proposals contained within the draft amended Park Development Framework (PDF) and notes and acknowledges the amendments made in respect of concerns raised in February 2015 to an earlier draft of the Area Proposals. Specific comments on each element of the consultation are provided below.</p>	<p>Comments noted <i>[this is a comment that applies to all consultation documents]</i></p>	<p>No change</p>
P LA4.1	Essex CC Spatial Planning	SP		<p><u>Draft Strategic Planning Policies.</u> It is recommended that the Authority maintain discussions with EFDC to ensure the approach is not used to stifle the viability and vitality of existing commercial uses in the Park and adjacent to its boundaries, in line with land used for glasshouses and allocations for employment use in the Epping Forest District Council Local Plan Submission Version (EFDC LPSV) (2018).</p>	<p>Noted, the Authority has ensured that EFDC (as with other riparian authorities) is involved with all stages of the PDF process and has held regular discussions on key matters such as visitor facilities, glasshouses, the Local Plan and issues relating to protected sites. The Authority regularly attends the Six Authority's meetings where cross boundary issues are discussed.</p>	<p>No change</p>
P LA5.0	Herts CC Environment & Infrastructure	SP		<p>Thank you for the opportunity to comment on the above. This letter relates to the services of the Environment & Infrastructure Department, which also incorporates other services provided by the county council where relevant.</p>	<p>Comments noted and welcomed</p>	<p>No change</p>

P LA5.1	Herts CC Environment & Infrastructure	SP	2.22	<p>Natural, Historic and Built Environment</p> <p>The county council has the following comments to make in relation to 'landscape' and the 'historic environment'.</p> <p>Landscape</p> <p>Paragraph 2.22 of the Strategic Policies acknowledges that the Park has an important role to play in the delivery of sustainable development, and touches upon it briefly in terms of transport, eco-system services and food production.</p> <p>It is suggested that there is also an opportunity to embed sustainability in the strategic policies, and a requirement to use sustainable construction techniques and materials in the delivery of new development within the Park.</p>	<p>Sustainable design and management are key components of the Authority's Environmental Strategy 2011. However it would be helpful to clarify this position in relation to the Strategic Policies so a new policy renumbered as D2 has been included. The original D2 is now D3 and has also been amended.</p>	<p>Add new policy as D2:</p> <p>Ensure that development proposed within the Park is of the highest environmental standards.</p> <p>Renumber D2 as D3 and amend as follows: "Work in partnership with riparian councils to ensure that the nature design and layout of new development on sites both within the Regional Park and adjacent to its boundary:</p> <p>a) Enhances the Regional Park, in-line-with its draft-strategic-policies-and avoiding detrimental impact on its ecological and heritage assets; and</p> <p>b) provides sufficient open space to cater for the informal recreational needs arising from the development, including areas for play, and for dog walking."</p>
P LA5.2	Herts CC Environment & Infrastructure	SP	5.6	<p>L1-L7</p> <p>The aim to 'Conserve and enhance the Park's landscape character, key views and openness', and the strategic policies to achieve this aim, are fully supported, and include the vital 'hooks' to the landscape character assessment, and landscape and visual impact assessment.</p>	<p>Comment and support welcomed</p>	<p>No change</p>
P LA5.3	Herts CC Environment & Infrastructure	SP	5.3	<p>Historic Environment</p> <p>The county council supports the inclusion of the conservation and enhancement of the cultural heritage of the Park and its historic environment as one of the strategic planning aims set out in the Development Framework (Part 1 Strategic Policies).</p>	<p>Support welcomed</p>	<p>No change</p>
P LA5.4	Herts CC Environment & Infrastructure	SP	5.7	<p>H1-H3</p> <p>The county council also supports the stated intention that: "The Park Authority will:</p> <p>H1: Conserve and enhance the Park's cultural heritage, including its archaeology, historic buildings and structures and their settings.</p> <p>H2: Support proposals to enhance access to and interpret heritage assets, recognising their value in providing opportunities for leisure, health and recreation.</p> <p>H3: Work with other bodies to support art, festivals and fairs".</p>	<p>Support welcomed</p>	<p>No change</p>
P LA5.5	Herts CC Environment & Infrastructure	EVB	6.1-6.27	<p>It is noted that the Evidence Base included with the draft strategic policies includes a well-informed summary of the key features and attributes relating to heritage within the Park, under Chapter 6: Landscape and Heritage. Chapter 6 also highlights some of the key issues associated with the Park's historic assets notably:</p> <ul style="list-style-type: none"> - the potential for new development to adversely affect the integrity, setting and special character of heritage assets; and, - opportunities to enhance the character of the Park's historic landscapes and townscapes by conserving and managing the setting, special character and accessibility of the Park's historic assets and views. 	<p>Comments noted and welcomed</p>	<p>No change</p>
P LA5.6	Herts CC Environment & Infrastructure	EVB		<p>In this context, it is noted that the draft amended Area Proposals for the Regional Park Areas 6, 7 and 8 include Landscape and Heritage as one of the themes examined in relation to each proposal, and the proposals demonstrate a clear recognition of the value of several important heritage assets within the Park, such as the Royal Gunpowder Mills, Waltham Abbey, Rye House Gatehouse, Emma's Well, the New River, and the Lee Navigation.</p>	<p>Comments noted as relevant to Policies as well as the Area Proposals</p>	<p>No change</p>

P LA5.7	Herts CC Environment & Infrastructure	EVB SEA SP	<p>The county council also notes that since, in addition to these known heritage assets, new sites are identified on a regular basis throughout the county, it is highly likely that currently unknown heritage assets are present within areas of the Park that have not been subject to prior disturbance/mineral extraction etc.. It is also possible that some of these assets may be of comparable significance to already designated assets, such as Scheduled Monuments, and should be treated as such (NPPF paragraph 39). The draft proposals have not been amended in this regard.</p>	<p>Noted and agreed, but as stated previously the Authority does not have the expertise or resources to identify these 'hidden' assets. Development proposals will be required through the local authority planning application process to carry out all necessary surveys with regard to heritage assets. Policy H1 has been amended in response to other comments and makes reference to conserving and enhancing the Park's 'historic environment' including its 'landscapes' and their settings.</p>	<p>No change in response to this comment. However, please refer to OA11.9 below, which refers to the following amendments to H1 where the wording 'historic environment' has been added allowing for a wider interpretation of heritage assets: "Conserve and enhance the Park's historic environment and cultural heritage, including its archaeology, historic buildings, and structures, landscapes and their settings."</p>
P LA5.8	Herts CC Environment & Infrastructure	SEA SP	<p>Furthermore, in meeting the requirements of the Strategic Environmental Assessment Regulations, the Environmental report should examine the likely significant effects on the environment of implementing the plan, in its identification and evaluation of a range of issues. Among these is cultural heritage, including architectural and archaeological heritage. The SEA Framework (Table 3.1) however solely includes, as Strategic Environmental Assessment 10, the intention 'To maintain and enhance existing known heritage while seeking their full potential as visitor attractions or stimuli for regeneration'. This again demonstrates that the draft proposals do not recognise the potential for the Park to contain currently unknown heritage assets, or indeed the varied nature of the undesignated heritage assets known to be present within the Park.</p>	<p>Comments noted and as stated above unfortunately the Authority does not have the expertise or resources to identify these 'hidden' assets. Development proposals will be required through the local authority planning application process to carry out all necessary surveys with regard to heritage assets. Policy H1 has been amended in response to other comments and makes reference to conserving and enhancing the Park's 'historic environment' including its 'landscapes' and their settings.</p>	<p>Please refer to amendments described above.</p>
P LA5.9	Herts CC Environment & Infrastructure	SEA SP	<p>The draft proposals do not therefore fully represent heritage assets with archaeological interest, or reflect the current policy framework provided by the NPPF and supporting guidance. The county council recommends that the proposals should be revised to ensure the conservation and enhancement of both designated and undesignated heritage assets and to provide for the potential impact of intended development and land management proposals upon such assets (e.g. construction of visitor facilities, remediation of contaminated land, the introduction of short term rotation coppice, etc.), via appropriate mitigation. It is also recommended that 'landscape heritage assets' should be referred to as heritage assets.</p>	<p>Comments noted, Development proposals will be required through the local authority planning application process to carry out all necessary surveys with regard to heritage assets. Policy H1 has been amended in response to other comments and makes reference to conserving and enhancing the Park's 'historic environment' including its 'landscapes' and their settings.</p>	<p>No change other than amendments to H1 as set out under OA11.9</p>
P LA6.0	Enfield	SP	<p>Enfield supports many of the draft strategic policy and aspirations outlined in the draft Park Plan. In particular, the draft policies on improving access, increasing attractiveness, enhancement and protection of water spaces and the effective use and management of land are welcomed. As an adjacent Riparian authority, we welcome the benefits provided by the Lee Valley for our residents and visitors to Enfield and we are happy to build upon our relationship based on our mutually beneficial ambitions and shared objectives. We have set out a few comments which I hope you find useful.</p>	<p>Comments and support welcomed</p>	<p>No change</p>

P LA6.1	Enfield	SP	L5	<p>Draft Policy L5 as drafted is of some concern as it could constrain higher density and taller development in or close to the park area. This represents a change from the existing Park Plan which makes no explicit policy reference to 'tall' buildings. As drafted the Policy may have implications for Enfield's challenge to meet significant housing and regeneration growth, including the growth aspirations set out in the Mayor's Upper Lee Valley Opportunity Areas Planning Framework (ULVOAPF) which is now due to be reviewed in light of the proposition of Crossrail 2 and significant infrastructure investment in the Upper Lee Valley corridor. Enfield would welcome some redrafting of the policy wording in Policy L5 to introduce some flexibility and welcomes the opportunity to work in partnership with Lee Valley Regional Park Authority, the Mayor of London and others to secure investment in the Upper Lee Valley corridor. The Draft Park Plan should recognise that this may include taller development, only where this is considered to be appropriate and in accordance with all relevant policies contained within adjoining Local Authority Local Plans, the London Plan and those within the Park Plan.</p>	<p>Policy L5 now renumbered as L3 applies to the whole Park and is informed by the Landscape Character Assessment which defines the Regional Park as having distinct qualities differentiating it from the surrounding urban fabric. It is these qualities which this policy seeks to protect. The term 'resist' has been removed from the policy text, however tall buildings proposed adjacent or close to the Park will still need to be considered in the light of landscape and visual impact assessments as would be expected as part of the planning process. The Authority recognises the challenges facing local authorities in meeting significant housing and regeneration growth, particularly those within the Upper Lee Valley Opportunity Area. Tall residential buildings adjacent to the Regional Park gain an added 'value' or benefit from their proximity to and the views out over the Regional Park. However these views out across the valley, the openness of the Park, the visual connectiveness of open and green spaces are the key to the Park's attractiveness and underpin its enjoyment by people contributing to their well being, whether they visit for active sport, informal recreation or are just passing through. Tall buildings within the Park can interrupt and undermine these values and detract from the Park's landscapes.</p>	<p>Amend Policy on tall buildings, previously L5 but now renumbered as L3 as follows: L3 Require full landscape and visual assessments to be made of all proposals for tall buildings for sites both within and adjacent to the Park. Resist tall-buildings within the Park and consider the impacts of proposed tall-buildings adjacent to the Park. In light of a full landscape and visual impact assessment.</p>
P LA6.2	Enfield	SP	2.44	<p>The Park Authority, being a statutory consultee, has been involved in the progress of the Edmonton Leaside AAP at all stages of production. The draft Plan identifies the regeneration of Meridian Water and mentions this at paragraph 2.44 in the wider context of the Upper Lee Valley Opportunity Area Planning Framework. Ponders End regeneration is also mentioned and recognised as part of the wider ULV OAPF. Enfield welcomes these inclusions, and sees them as necessary, and suggests that greater reference be given to Crossrail 2 and the review of the ULV OAPF by the Mayor of London as a growth opportunity for the whole Corridor in this paragraph.</p>	<p>Comments noted and agreed. Add text to para 2.44 to note the review process.</p>	<p>Paragraph 2.44 to be amended with the addition of the following text as a final sentence: "The GLA is in the process of revising this document which is likely to reflect its new regeneration priorities and refer to Crossrail 2"</p>
P LA6.3	Enfield	SP	4.27 - 4.32	<p>Development pressures close to and within the Park on page 31 should also be recognised as opportunities for enhancement and greater accessibility to the Park for neighbouring communities, particularly in Enfield where residents in the east of our borough currently face barriers in accessing the Park's rich landscapes and attractions.</p>	<p>Comment noted but already covered under para 4.30 where it states "However new development provides opportunities to make improvements to the Park; for example by enhancing and creating new entrance points along its boundaries"</p>	<p>No change</p>

P LA6.4	Enfield	SP	B4	5.8	<p>Policy B4 is particularly significant as it specifies the use of Natural Capital Accounting within the policy as a method of assessing the quality of open land in financial terms. This means that any proposals falling within the LVRPA boundary that would result in the loss or reconfiguration of any open land would need to make use of Natural Capital Accounting methods as part of any planning applications, demonstrating that any land lost would be replaced of equal or greater financial value. This approach is in line with the emerging approach Draft London Plan and it would be interesting to see how in practice this policy is applied, particularly given the LVRP is either designated green belt of Metropolitan Open Land.</p>	<p>Comments noted. As is the case with all public agencies the Authority is feeling its way with the concept of natural capital accounting. Implementation requires further discussion with stakeholders and the riparian planning authorities given this reflects a new approach of understanding the intrinsic value of the natural environment. Policies have been reorganised to separate natural capital (which is wider than just biodiversity) from reference to net gain in biodiversity please refer to E1 and B4 which is renumbered as B2</p>	<p>Revise Policy E1 and B4 as follows: "E1 Work with landowners and key stakeholders across the Regional Park to ensure a) the most effective use of land and property in fulfilment of its statutory purpose, and b) that development proposals take into consideration the Natural Capital Accounting Framework." "B2 Proposals that could result in a net loss of biodiversity will be resisted. Where necessary the Authority will seek planning obligations to deliver the 'mitigation hierarchy' of avoidance, mitigation and compensation." Ensure development proposals within the Park achieve a net gain in natural capital, including net gains in biodiversity.</p>
P LA6.5	Enfield	SP	B4	5.8 4.36	<p>Policy B4 also makes mention of 'net gains in Biodiversity' which alludes to the use of some form of biodiversity offsetting metric. The Mayor of London has proposed to formulate such an approach for London but this as yet is still forthcoming. A biodiversity off-setting metric has been used in some Thameslink projects and may be more appropriate in relation to the CR2 project. The Council would welcome some further clarity on this point and the use of a biodiversity off-setting metric.</p>	<p>It is understood that there are several different biodiversity offsetting metrics in operation by different bodies which cut across the Regional Park. It will be necessary to select the appropriate measure in each case. However policy has been modified to reflect the overarching DEFRA metric endorsed by NE and new policy B1 is now also relevant</p>	<p>Please refer to amendments above and new policy B1 as follows: Development within the Regional Park should be consistent with the Authority's Biodiversity Action Plan and in accordance with a locally approved or DEFRA endorsed biodiversity assessment metric. Protect and enhance the Park's statutorily-designated nature conservation sites.</p>
LA6.6	Enfield				<p>Enfield's New Local Plan Enfield Council is currently working towards publication and consultation of its Regulation 18 - Draft New Local Plan and this as an opportunity where both the Council and the Lee Valley Regional Park Authority can benefit from closer collaborative working and understanding.</p>	<p>Comments noted, the Authority welcomes a continuation of collaborative working with L.B. Enfield</p>	<p>No change</p>
P LA7.0	Hackney	SP			<p>Thank you for the opportunity to comment on the proposed strategic policies in the Lee Valley Regional Park Plan. We are broadly supportive of the strategic context, key challenges, opportunities, vision, strategic planning and policy as identified in the Plan. We have set out below a number of observations some of which will assist you when reviewing the Area Proposals for the Hackney area.</p>	<p>Comments noted</p>	<p>No change</p>
P LA7.1	Hackney	SP		2.49 - 2.50	<p>General. There should be reference to the Mayor's ambition for London to be assigned a National Park City as outlined in paragraph 1.2.6 of the draft London plan which the Lee Valley Regional Park will be a vital component.</p>	<p>The Mayor's ambition to make London a National Park city is significant in relation to the Park and is referenced under para 2.50 second bullet point.</p>	<p>No change</p>
P LA7.2	Hackney	SP		4.27 - 4.32	<p>Key Challenges and Opportunities Hackney's emerging Local Plan 2033 identifies brownfield land in the Lee Valley Edge corridor as an opportunity area for housing led development with improvement access to the Park. Hackney's boroughwide characterisation study (2018) identifies opportunities where development can respond to the natural environment setting and improve quality facilities and accessibility into and through the park. This will increase the attractiveness and accessibility of the park to the communities nearby and from further afield.</p>	<p>Comments noted and welcomed</p>	<p>No change</p>

P LA7.3	Hackney	SP	4.37 - 4.40	There is also an opportunity through the Plan to advocate support for the improvements to public transport network and maximise the community and regeneration and connectivity to and through the park, including a potential eastern spur of Crossrail 2 which would create an additional east west public transport route and greater access to the southern section of the Park.	Comments noted and agreed, additional text about the eastern spur will be added at paragraph 2.13	Add text to paragraph 2.13 as follows: "A potential eastern spur of Crossrail 2 via Hackney Central would create an additional east west public transport route and greater access to the southern section of the Park."
P LA7.4	Hackney	SP	5.12	Vision strategic planning aims and policy Hackney Council support aims to improve accessibility and entrances to the park for pedestrians and cyclist and via public transport, we feel that it should explicitly reference the need for inclusivity including those with limited mobility, and communities/groups who don't currently visit or use the Park.	Comments noted and agreed. An additional policy 'A6' will be added at 5.12 to reflect the work the Authority is already doing through its Community Access Fund and its diverse events programme.	New policy to be added at 5.12 as follows: "A6 Respond to the diversity of need enabling access to the Park by all communities"
P LA7.5	Hackney	SP	5.9	Hackney also advocate that water spaces can have a role and function beyond biodiversity and recreation, including residential moorings and freight in certain locations and circumstances.	Comments noted. Given the demand on the waterways within the Regional Park - leisure, sport, biodiversity, the Authority does not promote residential moorings within the Park, although these would be considered if provided offline and managed full time. Use of the waterways to transport freight has been investigated on a number of occasions in relation to development projects but as yet has not proved viable. The Area Proposals identify locations where further feasibility could be undertaken to identify water based freight opportunities.	No change
P LA8.0	Tower Hamlets		5.1	Thank you for providing the London Borough of Tower Hamlets (LBTH) the opportunity to respond to the above consultation. Our detailed comments are set out in Appendix 1. The comments highlight that we are generally supportive of the vision of the Park Development Framework. The Council's key concern relates to the effective use and management of land so that the Park is strictly developed for park related uses. The Council would like to raise the importance of health and wellbeing which should be recognised as a strategic planning aim.	Comments and support welcomed. An amendment will be made to the strategic planning aim under 5.10 about increasing the attractiveness and use of the parklands and venues.	Amend the strategic planning aim as follows: "Increase the attractiveness and use of the parklands and venues to support the health and wellbeing of visitors from all communities"
P LA8.1	Tower Hamlets	EvB		All evidence base should also be up-to-date, and we make specific reference to the housing targets, heritage assets and biodiversity.	Noted	No Change
P LA8.2	Tower Hamlets			We would also add that the objectives of this document can be further strengthened by providing clarity and additional information relating to how the policy can be implemented, such as with further detail in supporting text. Related to this point, the framework would benefit from providing some consideration to delivery.	Comments noted. The Authority is reporting on delivery at the project scale based on the Area Proposals	No change

P LA8.3	Tower Hamlets	SP HRA	2.47	<p>With regard to housing numbers proposed and quoted, it is imperative that these are accurately provided. Page 14 of the Lee Valley Regional Park Strategic Planning Evidence and Policies (February 2018) gives information on the Mayor's housing zones and makes a reference to 3923 homes at the Poplar Riverside in Tower Hamlets. Whilst this section states that "the programme is also expected to provide 150,000 associated jobs over the next ten years", no timeframe is given for the mentioned housing target. In addition to this, page 40 of the HRA of the Park Development Framework: Update of Strategic Policies (March 2018) states that Regulation 19 consultation of Tower Hamlets Local Plan 2031 indicates an annual housing target (approximate) of 3,100 homes. The Council would like to confirm the source of these housing numbers and request clarity of their scope, i.e. do they refer to the borough or areas of the borough? Regardless, they are a cause for confusion. Regulation 19 of the Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits sets out a minimum requirement of 3,931 homes per annum (adopted London Plan, 2016). It does not refer to the draft London Plan's target.</p>	<p>Amend figures given in the draft Strategic Policies document at page 14 paragraph 2.47 Poplar Riverside: change '3923 homes' to read 9,000 homes with a footnote referencing the London Borough of Tower Hamlets Housing Delivery Strategy Sept 2017 as source material. Amend the HRA report to correct the homes per annum figure used in Table 5.3 to 3,931</p>
P LA8.4	Tower Hamlets	SP	5.5	<p>Policy E1 seeks to make effective use & management of land by working with landowners across the Regional Park in fulfilling its statutory purposes. This policy is very generic and given the pressure faced by LVPA & the development pressure in the land adjacent to the park, there is a danger that land could be developed for uses that may not actually be in the interest of the Park or its users. This section therefore needs further work & requires clarity on 'effective use & management of land' to ensure that the land is developed for park compatible uses. The Park Plan in 2000 identifies some of the challenges (pg. 11) "Since the Regional Park was established, the area of land in non-Park compatible uses such as commerce, industry and residential has increased. The opportunity to bring land into park related use in the future has been 'lost' through adverse developments (mostly housing)."</p>	<p>Comments noted</p>
P LA8.5	Tower Hamlets	SP	5.5	<p>Continued. Significant losses have also occurred through road construction. The development of the M25 and the North/South Route as well as more minor schemes has left residual sites or isolated sites which no longer contribute to the purposes of the Park". It appears that effective use & management of land is a very general definition in the policy and should be strengthened appropriately. Furthermore, the policy should acknowledge that there might be other stakeholders within the Regional Park, not solely landowners.</p>	<p>Amend Policy E1 Work with landowners and key stakeholders across the Regional Park to ensure: a) the most effective use of land and property in fulfilment of its statutory purpose; and b) that development proposals take into consideration the Natural Capital Accounting Framework.</p>
P LA8.6	Tower Hamlets	SP	5.6	<p>Landscape character, key views and openness The Council supports policies L1 to L7 which seek to conserve and enhance the Parks Landscape character, key views and openness.</p>	<p>No Change in response to this comment, although Landscape policies have been rationalised. Refer to main document.</p>

P LA8.7	Tower Hamlets	SP	5.7	<p>Cultural heritage and historic environment</p> <p>Whilst the Council supports the intention to conserve and enhance the cultural heritage of the Park, including its archaeology, historic buildings and structures and their settings, it should be noted that majority of the LVRP within Tower Hamlets is situated within conservation areas and the Council would welcome their acknowledgement in policies.</p>	<p>Comments noted. Reference to Conservation Areas will be added under Para 3.22. However the Policy H1 with amendments is considered sufficient to cover all aspect of heritage. The Authority has little control in respect of Conservation Areas.</p>	<p>Add the following text to paragraph 3.22 after the first sentence: "The Park contains a wealth of historic buildings reflecting the various phases of its long history of human settlement, many of which are designated Conservation Areas." Note amendments to Policy H1 see response OA11.8 below.</p>
P LA8.8	Tower Hamlets	SP	4.34 - 4.36	<p>Biodiversity. Whilst the Council supports policies that seek to protect and enhance the biodiversity of the Park, policy B6 - 'secure compensatory measure for adverse biodiversity impacts which cannot be mitigated', secured by planning obligations and undertakings and agreements under section 27 of the Lea Valley Regional Park Act 1986' leaves room for dilution of the aim of this policy. This policy should seek to resist schemes that have an adverse biodiversity impact on the Park. In the absence of this, developments within and in the setting of the Park could over time result adverse impact on the Park. The Council considers that information on biodiversity is an accurate, if very brief, high-level summary of the park's importance for biodiversity and access to nature. Paragraphs 4.34-4.36 in the Strategic Policies and Evidence document are a good summary of the relevant challenges and opportunities relating to biodiversity. The Council considers policies to be sufficiently robust when conserving and enhancing the park's biodiversity.</p>	<p>Comments noted. The section on biodiversity has been revised so there is a hierarchy of action and to take account of the NPPF. B6 has been deleted. Please refer to the revised B1 and B2 which cover the points raised.</p>	<p>Delete Policy B6. Amend Policy B1 and B2 as follows: B1 Development within the Regional Park should be consistent with the Authority's Biodiversity Action Plan and in accordance with a locally approved or DEFRA endorsed biodiversity assessment metric. Protect and enhance the Park's statutorily-designated nature-conservation sites. B2 Proposals that could result in a net loss of biodiversity will be resisted. Where necessary the Authority will seek planning obligations to deliver the "mitigation hierarchy" of avoidance, mitigation and compensation. Ensure development proposals within the Park achieve a net gain in natural capital, including net-gains in biodiversity.</p>
P LA8.9	Tower Hamlets	SP	L3 D2	<p>The references to the Park's semi-natural character in L3 and protected ecological and heritage assets in D2 are welcomed.</p>	<p>Support welcome</p>	<p>No Change</p>
P LA8.10	Tower Hamlets	SP	3.31	<p>Paragraph 3.31 concentrates on habitats and sites. It might be worth adding something about species, as the park support rare species and internationally important populations of species. Likewise, in Table 3.1 on ecosystem services, there should be a mention of rare and important populations of species under "Supports biodiversity". Otherwise, this table seems comprehensive.</p>	<p>Agreed additional wording will be added to cover this point. This will also be added to Table 3.1 under the heading 'Supports Biodiversity'</p>	<p>Amend paragraph 3.31 as follows and add text in red to Table 3.1: "The Park contains a diverse range of high quality habitats including rivers and streams, standing open water, floodplain grassland and fen, wet woodland, and urban post-industrial habitats. These habitats support a range of species of which individuals and their assemblages range in status from local to international importance. Eight sites in the Park are designated Sites of Special Scientific Interest (SSSI), including Arnwell, Rye Meads, Turnford and Cheshunt Pits, Walthamstow Reservoirs, Waltham Abbey Woods, Cormill Stream and Older River Lea, Chingford Reservoirs, and Walthamstow Marshes. The first four of these together form the Lee Valley Special Protection Area (SPA) and Ramsar site.</p>
P LA8.11	Tower Hamlets	SP	5.9	<p>Water space</p> <p>Policies W1 and W2 that seek to protect biodiversity and recreational offer, and support recreational use of water spaces. Tower Hamlets' New Local Plan requires no loss or covering of water spaces unless developments include water-related or water-dependent uses. Whilst policy W2 supports developments that encourage recreational uses, the Council would welcome the greater protection of the water spaces from other incompatible uses.</p>	<p>Comments noted and the issue understood but in terms of the Regional Park's planning role W2 is considered sufficient.</p>	<p>No change</p>
P LA8.12	Tower Hamlets	SP	5.1	<p>Parkland and venues</p> <p>The Council supports policies V2-V4 which seeks to develop sporting uses and provide appropriate visitor/education facilities.</p>	<p>Support welcome</p>	<p>No Change</p>

P LA8.13	Tower Hamlets	SP	V1	5.1	<p>However, policy V1 resists the development of non-Park related uses unless they can make a significant contribution to the Authority's statutory purposes. The policy is not clear about what it seeks to achieve and raises concerns as to how this will be interpreted. The Park was proposed in 1966 in response to an increasing scarcity of land for leisure and recreational uses. The aim was to link the area with derelict land in the city with existing open spaces to form a green corridor (The Park Plan 2000 pg. 5). Unless the policies resist non-Park uses, there is a danger that the delivery of green corridor will be compromised, particularly in dense urban areas.</p>	<p>Comments noted and it is agreed that D3 is unclear. It will be deleted</p>	No Change
P LA8.14	Tower Hamlets	SP	D3	5.11	<p>Major Developments. Whilst the policies in general are supported, policy D3 is unclear. Policy D3 supports development that is consistent with other strategic policies particularly leisure, recreation and sports. Policy D3 could provide clear direction by expressly stating that it would support the development of Park - compatible use that is consistent with other strategic priorities to ensure that the primary purpose of the Park is not compromised over time.</p>	<p>Comments noted and support welcomed.</p>	<p>Delete Policy D3 Support development that is consistent with other strategic policies, particularly recreational, leisure and sporting facilities.</p>
P LA8.15	Tower Hamlets	SP	A1 - A5		<p>Accessibility The Council supports policies A1-A5 which seeks to improve accessibility and movement, and promote way finding within the Park.</p>	<p>Comments and support welcomed.</p>	No Change
P LA8.16	Tower Hamlets	SP		5.1	<p>Health and wellbeing Whilst the document and policies reference elements of health improvement such as active travel, leisure and recreation but not to any detail, the Council considers that the policies do not acknowledge the importance of promoting individual and community health and well-being. The documents refer to numerous policies / strategies that influence healthy living concerning stress, air quality as well as living space to support community cohesion but there is definitely scope to strengthen this area.</p>	<p>Agreed. Additional text has been incorporated into the strategic planning aim under 5.10 to cover this point.</p>	<p>Amend the following strategic planning aim as follows: "Increase the attractiveness and use of the parklands and venues to support the health and wellbeing of visitors from all communities"</p>
P LA8.17	Tower Hamlets	EvB		para 6.16-6.20	<p>Design and heritage Lee Valley Regional Park evidence base fails to recognise the presence of the sections located in Tower Hamlets. Admittedly our sections are not significant in terms of size, but since they are designated elements of the Regional Park, we need to be a part of the evidence as any other area.</p>	<p>Comments noted see below for further detail.</p>	See below
P LA8.18	Tower Hamlets	EvB		6.6-6.13	<p>The evidence base does not recognise landscape character of the Park's sections located within London Borough of Tower Hamlets. Further work is required to assess landscape quality and propose strategy directions. Admittedly all sections of the LVRP run through urban areas and are likely to be limited to the extent of water space. We need to understand the extent and methodology behind the classification of character and landscape strategy directions. All sections require closer look and understanding of exact boundaries in order to suggest any specific direction of the strategy.</p>	<p>Comments noted and agreed, section 6 of the Evidence Base will be updated to reflect details in the new landscape character assessment and guidelines. This will cover the landscape character of Park areas within Tower Hamlets</p>	<p>Section 6 paras 6.6 to 6.13 of the Evidence Base will be updated to reflect the new landscape character assessment and strategy guidelines; this will recognise the landscape character of the Park within Tower Hamlets.</p>

P LA8.19	Tower Hamlets	EVB	6.16 - 6.20	<p>Whilst all heritage assets in the vicinity of the park are mapped, the text on page 44-45 fails to list them. In case of Tower Hamlets LVRP</p> <p>a. Contains majority of Limehouse Cut CA and a small section of Regent's Canal CA</p> <p>b. Cuts through: Victoria Park CA, St Anne's Church CA, Three Mills CA,</p> <p>c. Is adjacent to Narrow Street CA, Fish Island and White Post Lane CA</p> <p>The text should also reflect on this and on key statutory listed buildings within or directly adjacent to the park. Map 6.4 appears busy and contains plethora of information irrelevant to the LVRP.</p>	<p>Comments noted, Map 6.4 provides a visual summary of how complex the heritage assets are within and surrounding the Park. Further detail is available from the relevant local authorities; boroughs and districts. Text will be amended to add further examples from the south of the Park as suggested.</p>	<p>Amendment needed to para 6.18 of the Evidence Base as follows: "The Park contains a high number of historic buildings and structures, many of which also form part of are designated conservation areas and are a major focus for visitors. These include: For example; the scheduled ancient monument of Rye House Gatehouse, Myddelton House and Gardens, and the Waltham Abbey Gardens, both of which are a major focus for visitors, and in the south the complex of buildings and features within the Three Mills Conservation Area and the Limehouse Cut Conservation Area. Many other Conservation Areas lie adjacent to the Park, such as the Fish Island and White Post Lane Conservation Area.</p>
P LA8.20	Tower Hamlets	EVB	4.1	<p>Biodiversity</p> <p>Paragraph 4.10 lists Greek Dock among a short list of species found in "interesting communities of plants on urban wasteland". Whilst the Council supports the inclusion of urban wasteland and its interesting plant communities in this section and agree that non-native species form a significant part of the interest of this habitat, Greek Dock is potentially a highly invasive species and it should not be interpreted as a positive feature. The Council recommends removing Greek Dock from the list.</p>	<p>Comments noted and agreed. Greek Dock will be removed from the list.</p>	<p>Remove Greek Dock from the list at paragraph 4.10 of the Evidence Base</p>
P LA8.21	Tower Hamlets	EVB	4.41	<p>Paragraph 4.41 is a little out of date as there is little or no saltmarsh vegetation left at East India Dock Basin, and Common Terns have not nested for the last two years, and don't appear to be doing so this year.</p>	<p>Comments noted. A survey in 2013 showed the presence of some saltmarsh. Text has been amended to better reflect the current situation.</p>	<p>Amend paragraph 4.41 as follows: "East India Dock contains tidal brackish water and there are mudflats with a small band of saltmarsh vegetation to the north. A colony of Common Tern return to the valley each year and have bred on the e here to breed every summer on the artificial rafts. Species recorded here include Black Redstart, Shelduck and flocks of wintering Teal."</p>
P LA8.22	Tower Hamlets	EVB		<p>Figure 4.1 does not appear to show SINC's correctly. East India Dock Basin is a SINC and it is not shown as such on this map. The Council questions whether the information on the map is from before the 2011 review which indicates it is out of date.</p>	<p>Agreed Fig 4.1 will be amended to show correct designation</p>	<p>Amend Fig 4.1 to show SINC's correctly.</p>
P LA8.23	Tower Hamlets	EVB		<p>Health and wellbeing</p> <p>The Council is supportive of the representation of the importance of health and wellbeing throughout the document.</p> <p>The council supports the acknowledgement of the benefits of open space to health and wellbeing, but it should also be considered how the LVRPA can attract a greater proportion of residents from more socially deprived backgrounds (social grade d/e semi-skilled, unskilled, unemployed etc.), which represent a greater number of their local residents, who are not accessing the park as much as they wish to.</p> <p>It should be noted that Primary Care Trusts haven't existed for over five years, as referenced in paragraph 5.23. As such, these should be omitted or the wording should be amended to reference Clinical Commissioning Groups which have replaced the PCT's.</p>	<p>Comments noted, please refer to the response above under LAB.16 regarding Health & Well being. Text will also be amended to use the correct terminology 'Clinical Commissioning Groups' as suggested.</p>	<p>Amend Evidence Base text at 5.3 to change PCT reference to Clinical Commissioning Groups, and check for any other occurrences and amend.</p>

P OA9.0	Canal & River Trust	SP	4.45	<p>The Canal & River Trust (the Trust) is the guardian of 2,000 miles of historic waterways across England and Wales, of which approximately 100 miles are within our London Waterway. We are among the largest charities in the UK. Our vision is that "living waterways transform places and enrich lives". Our waterways, including the adjacent towpaths, provide important areas for recreation, biodiversity, sustainable transport (with a related air quality benefit), business, tourism, a focal point for cultural activities and, increasingly, a space where Londoners are choosing to live. They can also provide a resource that can be used to heat and cool buildings, a corridor in which new utilities infrastructure can be installed and a way of sustainably draining surface water away from new developments. We believe that supportive policies and waterways and waterside places are part of a virtuous cycle that can increase wellbeing by improving physical and mental health, bringing communities together and encouraging economic development.</p>	<p>Comments noted</p>	<p>No change</p>
P OA9.1	Canal & River Trust	SP & EvB	4.45	<p>The Trust's waterways form a key part of the Lee Valley Regional Park. We agree that the park is an important asset for promoting health and wellbeing (para 4.45 of your strategic policies document) and we look forward to continuing to work with the Authority to deliver many of the strategic policies set out in the draft Park Plan document. We suggest that the Trust should be identified as a key stakeholder in the plan generally and any proposals related to the Lee Valley Walk, on-water uses, heritage or biodiversity of the waterway corridor.</p>	<p>Comments noted. The Trust is identified in the Area Proposals in relation to relevant proposals and projects. Additional text will be added in the Evidence Base and Policies documents to identify the role of the Canal & River Trust within the Park</p>	<p>Add text to Evidence Base, end of paragraph 2.35 as follows: "The Canal & River Trust is responsible for the Lee Navigation including the adjacent towpath and is a key stakeholder in relation to the waterway corridor, its heritage, biodiversity, visitor and general recreational use. The Trust is engaged in a series of improvement plans for the towpath to enhance walking and cycling opportunities." Add text to para 3.27 in the Policy document as follows: "The Park is also used extensively for informal recreation, particularly walking and cycling and also recreational boating, including cruising along both the Lee and Stort Navigations."</p>
P OA9.2	Canal & River Trust	SP		<p>The Trust's Improvement Plans. We are putting together proposals for improvements to the towpath along the Lee Navigation for walking and cycling and have been discussing these with TTL and the London Boroughs. We would like to meet with LVRPA to discuss these. Potential interventions include:</p> <ul style="list-style-type: none"> • Improving under bridge environments • Smoothing cobbles • Upgrading access points • Removing barriers • Upgrading the towpath where necessary • Improving wayfinding and links to other paths/points of interest/connections. <p>Whilst our main focus has been on the length of towpath within Greater London (the GLA area), we hope to secure improvements to the towpath between Ratty's Lane and Rye House if the Hoddesdon Energy from Waste Plant (which we have objected to on visual impact grounds) is permitted by the Secretary of State</p>	<p>Comments noted and improvement plans welcomed. A meeting will be arranged.</p>	<p>No change</p>

<p>P OA9.3</p>	<p>Canal & River Trust</p>	<p>SP</p>	<p>In addition, we: <ul style="list-style-type: none"> • have submitted a bid to Defra through the Water Environment Grant for soft bank protection along the Lee and Stort around Felides Weir. If successful, this would support maintaining/improving the Water Framework Directive status of the watercourses. We will find out if we have been successful in September. This follows similar work completed elsewhere in the park in 2017. • are installing canoe portages at Carthagea and Waltham Locks. This would help to promote Carthagea as an area for waterside recreation, consistent with the area proposals of the park plan. These are due for delivery this year. • are working in partnership with Herts and Middlesex Wildlife Trust on a catchment-based approach to invasive species along the Lee. </p>	<p>Improvement projects noted and welcomed. Additional canoe portages will hopefully tie in with the PDF Proposal to establish a canoe trail through the Park.</p> <p>No change</p>
<p>P OA9.4</p>	<p>Canal & River Trust</p>	<p>SP</p>	<p>3.34 <u>Promoting Walking and Cycling.</u> We support much of what is contained in the strategic policies document on walking, cycling and accessibility, including the section on 'accessibility and way marking', which is consistent with the Trust's plans. However, we suggest that there should be greater recognition of use of the park for utility trips and the potential for the park to form part of people's active travel journeys in their everyday lives (on pages 20-22 for example). The proximity of railway lines makes this feasible and the potential to have an impact on people's wellbeing by promoting these links should be explored further.</p>	<p>Comments noted, however the term or concept of utility trips is not a concept or term that the Authority seeks to promote in relation to the Park. Routes within the Park are designed primarily for leisure and sporting use</p> <p>No change</p>
<p>P OA9.5</p>	<p>Canal & River Trust</p>	<p>SP</p>	<p><u>Mooring within the Park.</u> The Trust is very disappointed to note that whilst the LVRPA appear to increasingly believe that residential development on land within the park may be an appropriate means of securing wider improvements consistent with its statutory functions (see the proposal for the Broxbourne Leisure Pool Development Brief, for example), this does not extend to on-water uses. We believe that there are clear benefits to meeting a proportion of the increased demand for residential moorings through the provision of appropriate managed sites. This would enable the provision of services (such as bins, pump out facilities, power and water points etc) that are better able to cope with the demands that residential boaters place upon them. It would also, for example, enable a better means of managing the storage of residential paraphernalia than is sometimes seen on towpath or less formal non-towpath moorings.</p>	<p>Comments noted. Proposals for residential development on Authority owned land could release capital for investment in the Regional Park. Proposals for residential moorings (as opposed to recreational or visitor moorings) advocated by the Canal & River Trust are as yet untried and untested in this respect.</p> <p>No change</p>

P OA9.6	Canal & River Trust	SP	<p>Over recent years, we have engaged with senior officers at LVRPA as part of our preparation of a London Mooring Strategy; published for consultation between Oct 2017 & Jan 2018. It explained the challenges that the Trust (& other stakeholders) face in responding to the rapid growth in the number of boats on & accessing our London waterways. In summary, betw 2010 - 2017 the number of boats sighted on the Trust's London waterways has grown from 2101 to 4001. The largest proportion of boats are in E. London (Limehouse Cut, Hertford Union Canal, Lee Navigation & River Stort). E. London has also seen the fastest growth. In recent surveys approx 50% of boaters told us that they use their boats as permanent homes. There are areas of the park where presence of moored boats & boating communities are an indisputable part of the local character. Our draft strategy proposed that a mooring policy should be agreed between our 2 organisations & drafts of this were made available by Trust staff for discussions at meetings during our engagement with you. Whilst no agreement could be reached, the issue still exists & it does not alter our belief that the provision of more permanent, managed moorings would have a net beneficial impact on the park and its ability to deliver its statutory functions. Other proposals in the Mooring Strategy are also relevant to your plan.</p>	<p>Officers did engage with the Canal & River Trust on work to inform a London Mooring Strategy and a report on the consultation version of the draft strategy was considered by the Authority's Executive Committee (Dec 2017 E/534/17). The Authority's response acknowledged the importance of developing a mooring strategy and a need for a tailored approach within the Park given its role for leisure and recreation. The Strategy also needed to address the important role the waterways play in supporting biodiversity and how this should be protected and enhanced. Further detail was requested and is awaited in relation to the Regional Park and on the priorities and resources needed to address the issues identified.</p>	No change
P OA9.7	Canal & River Trust	SP	<p>Given the engagement that we have undertaken and the timing of the publication of the draft London Mooring Strategy, we are curious as to why the Strategic Policies consultation document makes no reference to a significant change to how the waterways of the park are used. We suggest that the failure to address this issue at all (if only to justify the approach proposed) undermines either the contribution that our waterways make to the park (which we suggest would be erroneous) or the draft plan itself.</p>	<p>As above</p>	No change
P OA9.8	Canal & River Trust	SP	<p>In the context of the LVRPA's changing approach to residential development on certain parcels of land, we consider that it is not appropriate for statements such as "the development of linear residential moorings to be avoided" to be included within the character area proposals of a document that is intended to have weight in the planning process without a proper consideration of the policy and legislative issues. We would suggest that part of this consideration should be the changing legislative context, where, under section 124 of the Housing and Planning Act 2016, local authorities (as housing authorities) have an obligation to assess the needs of boaters residing in or resorting to their district. Draft government guidance suggests that the planning process should then be used to provide or facilitate provision. In the absence of any proper consideration of the impacts of the plan's approach to moorings in the park (and alternative policy positions), it is not possible to determine whether it is justified for support to be given to support for residential development on some areas of land but not others (including water).</p>	<p>Comments Noted, these also refer to the draft Proposals. The Park Authority is not a planning authority - housing needs are a matter for the local planning authorities to consider and assess. Policy in the PDF seeks to balance competing needs on the waterways in relation to the Park's remit, from leisure users, visitors, sporting interests and wildlife. As stated above proposals for residential development on Authority owned land could release capital for investment in the Regional Park. Proposals for residential moorings advocated by the Canal & River Trust are as yet untried and untested in this respect.</p>	No change

P OA9.9	Canal & River Trust	SP			<p>Operational Challenges The Trust has a number of operational challenges within the Lee Valley Regional Park. We would welcome a meeting with you to discuss how we may be able to address these in a joined-up, efficient manner. Issues include:</p> <ul style="list-style-type: none"> • Hot spots of rough sleeping and anti-social behaviour. • Areas that lack appropriate facilities, including towpath bins. • Signage • Collection of and disposal of aquatic weed and litter. • Suitable wharfage for the Trust's operational boats • Management of vegetation, including invasive species such as Giant Hogweed that straddles our boundary. <p>We believe that tackling these issues will lead to greater enjoyment of the park by visitors.</p>	<p>Comments noted and discussion on these matters would be welcome although these are all long standing issues.</p>	No change
P OA10.0	Environment Agency	SP			<p>Thank you for consulting us on the emerging Park Development Framework documents specifically the draft strategic planning policies and the draft amended proposals for Areas 6, 7 and 8. Our aim is to create better places for people and wildlife, and we welcome the opportunity to comment on the emerging plans. Our comments are as follows:</p>	<p>Comments noted</p>	No change
P OA10.1	Environment Agency	SP	4.41 - 4.44		<p>Section 4 – Key Challenges and Opportunities. We think this section has identified two main pressures and challenges regarding water resources and water quality. However, in regards to water quality, it could do with extending the pressures on water quality and resource to beyond over abstraction and effluent discharge. The challenges recognised should also extend to diffuse source pollution from urban runoff, pollution incidents, industrial discharges and other point source pollution such as drainage misconnections. These challenges are more likely to come from the surrounding areas of the park. Including these challenges will also place emphasis on the wider range of stakeholders and partners that need to play their part to improve the water environment, not solely the water companies.</p>	<p>Comments noted, text under 4.41-4.44 will be amended to add the pollution challenges identified.</p>	<p>Amend text at paragraph 4.44 and add a final sentence as follows: "Other challenges, likely to come from areas surrounding the Park include diffuse source pollution from urban runoff, pollution incidents, industrial discharges and other point source pollution such as drainage misconnections."</p>
P OA10.2	Environment Agency	SP	4.41 - 4.44		<p>In our response to the Strategic Environmental Assessment scoping report dated October 2017, we also highlighted the current status of the waterbodies within the park, as follows: The following waterbodies will have been classified in terms of their current ecological status or potential: - Lee Navigation (Enfield Lock to Tottenham Locks) GB106038027850 (2016 status: bad) - Lee Navigation (Fleides Weir to Enfield lock) GB106038077851 (2016 status: poor) - Small River lee (and tributaries) GB106038033200 (2016 status: moderate).</p>	<p>Comments noted; the status of the waterways as described is set out within the revised Evidence Base which underpins the SEA report, please refer to Table 7.1 Ecological Status of water bodies within LVRPA, page 52. Para 2.56 of SEA refers to this evidence.</p>	No change
P OA10.3	Environment Agency	SP	4.41 - 4.44		<p>We also raised the issue of boat movement in the park and its potential to contribute to poor water quality through sediment disturbance from boat wash and discharges of effluent into the watercourses. A number of Water Framework Directive action measures are identified for the Lee Navigation are linked to boat movement and increasing awareness of the impacts on water quality. We recommend you review our response to the SEA scoping and ensure the issues raised are adequately reflected in this section.</p>	<p>Water quality issues related to boat movements are covered under para 7.19 in the Evidence Base. Paragraph 2.57 of the SEA identifies the Authority's role in relation to this matter. Policy W1 and new Policy W3 are also relevant and cover this matter, given the Authority's ability to influence what happens.</p>	<p>No change but see new policy W3 as discussed under EA 10.10 below</p>

P OA10.4	Environment Agency	SP	4.41-4.44	We think it would be beneficial to state that these pressures for the water environment create challenges for us to help the waterbodies achieve "Good Ecological Status" which is an objective of the Thames River Basin Management Plan (2015).	Agreed, add sentence as suggested to highlight the challenges faced in achieving "Good Ecological Status"	Amend paragraph 4.44 by including an additional sentence in addition to that added in response to OA10.1 above, as follows: "These pressures for the water environment combine to create challenges for the EA and other stakeholders in seeking to achieve Good Ecological Status for the waterbodies in accordance with the Thames River Basin Management Plan (2015)"
P OA10.5	Environment Agency	SP	5.1 - 5.3	Section 5 – Vision, Aims and Strategic Policies. Flood Risk Although flood risk, flood mitigation and climate change are identified as key challenges in Section 4, this has not followed through into the strategic aims and policies in Section 5. The Spatial Portrait in Section 3 recognises the park's role in protecting London and the surrounding areas from flooding. The park largely consists of the River Lee's natural floodplain, and as such much of the land is classified as Flood Zones 2 and 3, defined by the National Planning Policy Framework as having a medium and high probability of fluvial flooding, respectively. The Lee Flood Relief Channel is also a vital piece of infrastructure within the park in alleviating the risk of flooding. It's important that the function of the Lee Flood Relief Channel and associated reservoirs is protected by future activities and development.	Comments noted, please see below for response	Amend policy text under section 5.3 - policy 5.9 see below
P OA10.6	Environment Agency	SP	5.1 - 5.3	Likewise, the Strategic Environmental Assessment Objective 12 "To reduce the risk of flooding to people and promote the sustainable management of flood risk" is not adequately promoted in the aims and policies.	Comments noted, please see below for response	Amend policy text under section 5.3 - policy 5.9 see below
P OA10.7	Environment Agency	SP	5.3	We recommend that an additional strategic planning aim is included in 5.3 as follows: - <i>Protect and enhance the park's function in reducing and managing flood risk.</i> The policy criteria under this aim could include the following: - Work with the Environment Agency and others to protect the function of the Lee Flood Relief Channel - Enhance the park's function in mitigating and reducing flood risk to the surrounding areas, by natural flood management and sustainable drainage measures - Increase the ability of the park and surrounding areas to adapt to climate change and its impact on flood risk by promoting green infrastructure.	Agreed a new policy aim and set of criteria will be included as suggested to cover flood risk and management although with a slight amendment to the suggested wording.	Amend policy text to include an additional strategic planning aim under 5.3 as follows: - Protect and enhance the Park's contribution to reducing and managing flood risk. Add a new set of policy criteria 5.13 under this policy aim as follows: 5.13 The Park Authority will: - Work with the Environment Agency and others to protect the function of the Lee Flood Relief Channel - Enhance the Park's contribution to mitigating and reducing flood risk to the surrounding areas, by natural flood management and sustainable drainage measures - Increase the ability of the Park and surrounding areas to adapt to climate change and its impact on flood risk by promoting green infrastructure.
P OA10.8	Environment Agency	SP	W1 and W2	The alternative to the above is to adapt strategic aim 'Protect and make the best use of the park's water spaces' with additional policy criteria under 5.9, to include 'flood risk' recognising the park's key role in flood storage and flood risk management. The above recommendation will help to ensure that the park's function as a flood risk asset is not compromised in achieving other objectives.	Please see response to P OA10.7 above	Please see response to P OA10.7 above

P OA10.9	Environment Agency	SP	5.3	Water quality and resources Regulation 17 of the Water Framework Directive (England and Wales) Regulations 2003 places a duty on each public body, including Local Authorities, to 'have regard to' River Basin Management Plans when exercising their functions. Based on our comments in relation to Section 4 and the SEA scoping, we recommend the following strategic aim is amended as follows: 'Protect, <i>improve</i> and make the best use of the Park's water spaces'	Comments noted and agreed. The strategic policy aim relating to the Park's water spaces will be amended as suggested.	Amend policy aim text under 5.3 as follows: Protect, improve and make the best use of the Park's water spaces.
P OA10.10	Environment Agency	SP	5.9	We recommend the policy criteria in 5.9 should include the following: W3: Ensure that existing water bodies are protected and enhanced supporting the objectives of the Thames River Basin Management Plan.	Comments noted. The Authority is a partner in the River Basin Management planning process - its main contribution is through habitat restoration and enhancement works and to a lesser extent in responding to planning proposals that might impact the water environment and its quality. An addition to the Water policies will be included as suggested.	Add the following as a third policy under 5.9 W3: Ensure that existing water bodies are protected and enhanced compliant with the objectives of the Thames River Basin Management Plan.
P OA10.11	Environment Agency	SP	5.11	D2 We recommend a similar policy criteria to D2 of policy 5.11 is added (for clarity and consistency) as follows: D2: Work in partnership with riparian councils to ensure that the nature of new development on sites both within and adjacent to its boundary enhances the Regional Park in line with its draft strategic policies and protects and enhances water bodies whilst reducing flood risk.	This is unnecessary given new W3 and new policies on reducing and managing flood risk - see above	No change
P OA11.0	Historic England	SP	2.3	We welcome the section on the historic environment but note a typographical error at the start of bullet point 3 (should read 'the')	Noted, text will be amended	Minor amendment first word bullet 3 para 2.30 should read 'The'
P OA11.1	Historic England	SP	2.40-41	We welcome reference to the Strategic Cultural Area.	Comments welcomed but unfortunately this is no longer recognised in the draft London Plan and the paragraph will need to be deleted.	Delete paragraphs 2.40 and 2.41
P OA11.2	Historic England	SP	3.6	We welcome the updating of the Draft Landscape Character Assessment.	Noted	
P OA11.3	Historic England	SP	3.15 - 3.22	We broadly welcome this section entitled, Revealing History. However, we suggest that specific reference is made to some of the many listed buildings, conservation areas, scheduled monuments in and immediately around the Park. We also suggest mention is made of any assets currently on the Heritage at Risk Register including Scheduled Monument and Conservation Area at the Royal Gunpowder Factory and Waltham Abbey.	Comments noted. Paragraphs 3.15 to 3.22 provide a good and detailed overview of the Park's heritage backed up by the Evidence Base which also seeks to map under Fig 6.4 the key features, such as listed buildings, registered parks and gardens and conservation areas etc. See also comments below at OA 11.7	No change
P OA11.4	Historic England	SP	3.28	We welcome the connection made between green infrastructure and the conservation, enhancement and interpretation of the setting of the Parks historic assets. However, we would normally refer to these as 'heritage assets' rather than 'historic assets'. Please amend this reference throughout the Plan.	Comments noted. Text will be amended.	Amend text throughout to ensure 'historic assets' is replaced with 'heritage assets'.
P OA11.5	Historic England	SP	Table 3.1	We welcome the reference in Table 3.1 to the appreciation of heritage.	Comments noted	No change

P OA11.6	Historic England	SP	4.3	we are concerned at the reference to 'replacing old structures with new and well-designed buildings.' This could be mis-interpreted. The NPPF emphasises the importance of the historic environment and states that heritage assets are an irreplaceable resource. Please amend this paragraph to clarify.	Comments noted, the reference to 'replacing old structures with new well designed buildings...' is not directed at heritage assets but the text can be amended to make this clearer.	Amend text under para 4.30 as follows: "...new development provides opportunities to make improvements to the Park; for example by enhancing and creating new entrance points along its boundaries, replacing old structures with new and well-designed buildings , conserving and enhancing historic heritage assets and their settings, as well as revealing significance, replacing old structures with new and well-designed buildings and incorporating planting and habitats within the development site that complement the Park." Please see further changes made below at P OA11.7
P OA11.7	Historic England	SP	Section 4, para 4.30	Section 4 could also have a section on Conservation and Enhancement of the Historic Environment. The paragraph could discuss the need to seek opportunities to better reveal significance and enhance setting of heritage assets and well as opportunities to address Heritage at Risk. There should also be greater reference to archaeology in the Plan.	Additional text included under 4.30 to pull together the various sections that mention heritage throughout the document.	Amend text under para 4.30 as follows: "...development has the potential to adversely affect the park's natural and heritage historic assets and their wider setting in the Park, particularly given the complexity of the Park's strategic and interconnected network of habitats and the multilayered and diverse heritage resource. " "However new development provides opportunities to make improvements to the Park.....(see changes above OA11.6) .that complement the Park. Development may also provide the opportunities to address Heritage at Risk."
P OA11.8	Historic England	SP	5.7	Paragraph 5.7 Whilst we broadly welcome this paragraph, H1 could be reworded to read Conserve and enhance the Park's <u>historic environment and cultural heritage</u> including its <u>archaeology, historic buildings and structures, areas and landscapes</u> and their settings.	Comments noted. Agreed that some rewording of H1 would be helpful.	Amend Policy text under H1 as follows: H1: Conserve and enhance the Park's historic environment and cultural heritage including its archaeology, historic buildings, and structures landscapes and their settings.
P OA11.9	Historic England	SP	5.11	Paragraph 5.11 We welcome the reference to heritage assets but would suggest the addition of the words 'and their settings' at the end of the sentence.	Comments noted but with the reference to 'settings' in H1 the addition of the same text under D2 is considered unnecessary	No change
P OA12.0	HIMWT	SP	5.8	The policies are good in principle but will be more effective if they are more specific around the subject of net gain. For net gain to mean anything tangible it must be measured in an objective, consistent and sanctioned way. The best mechanism currently available for doing this is the DEFRA biodiversity offsetting metric, or DEFRA metric. It has been adapted to be more generic or more specific (<i>attachments provided</i>) depending on the needs of LPAs. This mechanism (or more specifically an agreed calculator derived from the metric as attached or as specifically created and endorsed for the LVP) must be specified as the way by which net gain on habitats is demonstrated, i.e. that only a net positive ecological unit score will be permitted. I would suggest that the policy be adapted as below in red. Several LPAs in Hertfordshire have included reference to the metric in their local plans, including East Herts and Broxbourne. It would be entirely consistent with these documents if the LVP were to do the same. These reference the Environment Bank version as their calculator of choice. The current consultation on NPPF and the 25 year vision also refer to measurable net gain in biodiversity, further reinforcing the need for objective, measurable, and consistent evaluation, not the subjective situation we have now.	Comments noted and advice welcomed on this matter. As is the case with all public agencies the Authority is feeling its way with the concept of natural capital accounting and in achieving net gains in biodiversity. Implementation requires further discussion with stakeholders and the riparian planning authorities given this reflects a new approach of understanding the intrinsic value of the natural environment. Policies have been reorganised to separate natural capital under E1 which is wider than just biodiversity. Biodiversity policies have also been revised and B4 redrafted as B2. It is understood that there are several different biodiversity offsetting metrics in operation by different bodies which cut across the Regional Park. It will be necessary to select the appropriate measure in each case. However policy has been modified to reflect the overarching DEFRA metric endorsed by NE as suggested, please refer to thererevised B1.	Amend B1 as follows: Development within the Regional Park should be consistent with the Authority's Biodiversity Action Plan and in accordance with a locally approved or DEFRA endorsed biodiversity assessment metric. Protect and enhance the Park's statutorily-designated nature-conservation sites. Revise Policy B4 as follows: Proposals that could result in a net loss of biodiversity will be resisted. Where necessary the Authority will seek planning obligations to deliver the 'mitigation hierarchy' of avoidance, mitigation and compensation. Ensure development proposals within the Park achieve a net gain in natural capital— including—net gains in biodiversity.

P OA12.1	HIMWT	SP	B4	Amendments in bold "B4: Ensure development proposals within the Park achieve measurable net gains in biodiversity. Net gain on a habitat level must be determined by using the DEFRA biodiversity metric (as amended, or a locally endorsed biodiversity assessment metric)"	Comments noted please refer to amendments set out above.	Please note amendments above
P OA12.2	HIMWT	SP	B6	Amendments in bold "B6: Secure compensatory measures for adverse biodiversity impacts which cannot be mitigated, secured by planning obligations and undertakings and agreements under Section 27 of the Lee Valley Regional Park Act 1986. Work with the Mayor on a suitable approach to biodiversity offsetting, with the park providing 'receptor sites'. The extent, composition and management of offset sites will be determined by reference to the DEFRA biodiversity offsetting metric (as amended, or a locally endorsed biodiversity assessment metric)"	See amendments under Tower Hamlets LA9.8 above. B6 has been deleted and reference to biodiversity metric included within B1 as revised.	Delete Policy B6. Amend Policy B1 and B2 as follows: B1 Development within the Regional Park should be consistent with the Authority's Biodiversity Action Plan and in accordance with a locally approved or DEFRA endorsed biodiversity assessment metric. Protect and enhance the Park's statutorily-designated nature conservation sites B2 Proposals that could result in a net loss of biodiversity will be resisted. Where necessary the Authority will seek planning obligations to deliver the 'mitigation hierarchy' of avoidance, mitigation and compensation. Ensure development proposals within the Park achieve a net gain in natural capital, including net gains in biodiversity.
P OA13.0	Natural England	HRA		Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. In our review of the LVRPA Draft Strategic Planning Policies and HRA, Natural England are of the opinion that the draft policies may have likely significant effect upon the integrity of Lee Valley SPA (legally underpinned by Walthamstow Reservoirs SSSI).	Comments noted see below for further detail.	See below
P OA13.1	Natural England	HRA		Habitats Regulations Assessment – Recent ECJ We note that the HRA you have completed is a screening assessment. Natural England would like to take this opportunity to draw your attention to the recent European court judgement Case C-323/17. People Over Wind v Collite Teoranta (April 2018). The outcome of the legal judgement, is that if avoidance and mitigation is required to remove significant effects from a Natura 2000 site, such as Lee Valley SPA, then it is likely a full Appropriate Assessment will need to be completed. Unfortunately the matters cannot be merely screened out. We understand from reading your assessment avoidance and mitigation measures are part of your methodology. We are in the process of developing an approach to take in relation to this updated case law, associated advice has yet to be determined. I know that both the Planning Inspectorate and DTA Ecology have already published notes on this judgement. However you risk legal challenge if you continue with just a screening. We suggest you take your own legal advice. We attach the judgement for your information.	Comments noted. The Authority has held a meeting with NE under their Discretionary Advice Service to discuss the HRA and the methodology regarding mitigation. A second and updated response has now been received from NE please see below. This recognises the Authority's strong track record in conservation management and that the strategic framework with revised policies promotes the protection and enhancement of designated sites and biodiversity and HRA-compliant projects. NE therefore conclude that an LSE on Lee Valley SPA, as a result of public access associated disturbances caused by the Park Plan: Part 1 Strategic Policies update alone and in-combination, can be objectively ruled out at this stage. However with regard to air pollution the Authority recognises that as a result of air pollution caused by the Park Plan: Part 1 strategic policies in-combination with development plans in riparian and neighbouring authorities, a likely significant effect cannot be objectively ruled out at this stage. The Authority have therefore commissioned an Appropriate Assessment to consider this matter further.	Further policy changes may be required following the outcome of the AA regarding Air Pollution in combination impacts.

P OA13.2	Natural England	HRA			<p>Habitats Regulations Assessment</p> <p>We note that the HRA screens out likely significant effects on Lee Valley SPA. However we note a contradiction in the avoidance and mitigation strategies proposed in Policy B5 & B6. They suggest that the policies may cause likely significant effects upon the integrity of Lee Valley SPA. Especially in light of the Precautionary Principle test which sits within the Habitats Regulations.</p>	<p>Comments noted. Biodiversity policies have been redrafted and B5 and B6 deleted as a result of consultee comments. Please refer to revised B2 for policy on the mitigation hierarchy.</p>	<p>Revise policy B2 as follows: Proposals that could result in a net loss of biodiversity will be resisted. Where necessary the Authority will seek planning obligations to deliver the 'mitigation hierarchy' of avoidance, mitigation and compensation. Ensure development proposals within the Park achieve a net gain in natural capital, including net gains in biodiversity.</p>
P OA13.3	Natural England	HRA		<p>Furthermore, screening in Epping Forest SAC on the grounds of Air Quality suggests there is an expectation that more visitors will drive/take public transport to and from Lee Valley SPA, thus requiring to screen in Lee Valley SPA.</p>	<p>Noted the Authority is liaising with EFDC and the Conservators on air quality matters but awaits the outcome of the air quality modeling and transport assessment. This will form part of the AA. Please note new policy D4 that seeks to address issues relevant to the SAC.</p>	<p>New Policy D4: Working with the London Mayor and Riparian Boroughs/Districts explore opportunities to designate sites within the Park to allow access to natural green space designed to offset adverse impacts of new development on the Epping Forest SAC.</p>	
P OA13.4	Natural England	HRA		<p>In light of our advice to screen in the likely significant effects of the Draft Strategic Planning Policies on Lee Valley SPA in the HRA, we would recommend revisiting the avoidance and mitigation measures proposed after an appropriate assessment has been carried out. This will enable you to target specific biodiversity issues in light of the most up to date scientific knowledge.</p>	<p>Please see comments above and refer to the second updated response from NE</p>	<p>No change</p>	
P OA13.5	Natural England	SP	V3	<p>Policy V3: we note a discrepancy between this policy and paragraph 5.7.36 in the HRA. Paragraph 5.7.36 suggests events held within the LVRP are self-contained within key sites or buildings, suggesting visitors of self-contained events do not use wider parklands on the same trip, however, Policy V3 supports the integration of sporting venues with the wider parklands to support a diverse visitor offer. We would advise clarifying these points and incorporate strategies to avoid and mitigate the possible increase in recreational pressure</p>	<p>Comments noted, the parklands concept refers to the wider open spaces of the Park and not just protected sites. Policy V3 has been amended to clarify. The Area Proposals include the detail relating to recreational use and impact.</p>	<p>Amend V3 as follows: Work with stakeholders to promote and enhance existing sports facilities. Support site and venue development sympathetic to the wider parklands, that integrates sporting venues with the wider parklands to support a diverse visitor offer.</p>	
P OA13.6	Natural England	SP	E1	<p>Policy E1: we would advise amending this policy to include the management of designated sites, notably SPA land.</p>	<p>Comment noted. This point is covered in the Authority's Biodiversity Action Plan and in the Area Proposals</p>	<p>No change</p>	
P OA13.7	Natural England	SP	B5	<p>Policy B5: we would advise amending this policy to provide greater clarity as well as including other forms of avoidance and mitigation strategies to reduce the potential impacts on sensitive habitats and species.</p>	<p>Policy B5 has been deleted. Amendments have been made to other policies, please refer to the revised B1 and B2.</p>	<p>B1 Amend Policy B1 and B2 as follows: Development within the Regional Park should be consistent with the Authority's Biodiversity Action Plan and in accordance with a locally approved or DEFRA endorsed biodiversity assessment metric. Protect and enhance the Park's statutorily designated nature conservation sites. B2 Proposals that could result in a net loss of biodiversity will be resisted. Where necessary the Authority will seek planning obligations to deliver the 'mitigation hierarchy' of avoidance, mitigation and compensation. - Ensure development proposals within the Park achieve a net gain in natural capital, including net gains in biodiversity.</p>	
P OA13.8	Natural England	HRA & SP		<p>Natural England are of the opinion that a meeting between ourselves and the Regional Park would be the easiest manner with which to investigate and discuss our concerns, if the Regional Park are in agreement, a meeting can be organised through our Discretionary Advice Service (DAS) to discuss further the points made in this response. Please follow the link here to reach our DAS webpage for more information.</p>	<p>This meeting has been held under the Discretionary Advice Service. NE have provided a second revised response - as set out below OA 13.9 to OA13.17. An Appropriate Assessment is also being carried out as recommended.</p>	<p>No change</p>	

<p>P OA 13.9</p>	<p>Natural England</p>	<p>HRA 2nd response</p>	<p>5.7.33 5.7.34</p>	<p>Natural England's comments are set out below with reference to the relevant sections. Public Access and Associated Disturbance With reference to paragraphs 5.7.33 - 34: Natural England advises that the Lee Valley SPA areas is likely to have a visitor carrying capacity that can sustainably accommodate SPA favourable conservation status and favourable condition status for constituent SSSI's. Ideally, this should be considered at constituent site level (SSSI and possibly SSSI unit) and at a wider landscape-scale including 'functionally-linked' non-SPA land. With this in mind, and noting the proposed growth in housing within riparian boroughs and the wider area we advise that caution should be exercised going forward when making judgments about the capacity for LVRPA to continue to sustainably and effectively manage (ie, to ensure SPA favourable conservation status and SSSI favourable condition can be achieved and maintained within available resources) the effects of an increasing number of visitors.</p>	<p>No change</p>
<p>P OA 13.10</p>	<p>Natural England</p>	<p>HRA 2nd response</p>	<p>5.7.41</p>	<p>In Combination issues: <i>The HRA for Broxbourne Local Plan has identified an LSE on Lee Valley SPA due to public access associated disturbances, primarily due to the impacts of a strategic mixed use site in close proximity to Turnford & Cheshunt Gravel Pits. It is considered to be likely that the proposals by the LVRPA to improve visitor access will contribute towards the additional recreational pressures resulting from the Broxbourne Local Plan.</i> Consistent with this, Natural England notes the statements within paragraph 5.7.42:5.7.42 – "Policies D1 – D4 will see the LVRPA work with riparian authorities with a view to protecting sensitive natural assets such as landscape and biodiversity. In particular, the proposed Policy D2 would see the LVRPA work in partnership with riparian authorities to help ensure that development in the local area avoids detrimental impacts on ecological assets. This could potentially include measures such as helping authorities increase their provision of Suitable Alternative Natural Greenspaces in order to reduce the reliance of local residents on Lee Valley SPA for recreational purposes." ... and advises that, wherever possible, larger-scale developments should seek to adequately provide their own SANGS rather than rely on the Lee Valley Park to address recreational provision. Continued below....</p>	<p>Comments noted</p>
<p>P OA 13.11</p>	<p>Natural England</p>	<p>HRA 2nd response</p>	<p>5.7.34</p>	<p>This recognises the issues relevant to 5.7.34 (see above), noting the likely increases in visitors associated with regional growth will be challenging in its own right. In addition to this, it is important that Lee Valley SPA, its constituent SSSI's and significant biodiversity does not become increasingly isolated by intensive development. Instead, the relevant Land Use Plans should seek to safeguard and ensure there is suitable green infrastructure (wildlife habitats, networks and corridors) within the wider landscape of the surrounding Boroughs outside Lee Valley Park to help meet targets for sustainability and environmental resilience.</p>	<p>Comments noted and agreed. The Authority endeavours to secure additional green infrastructure as part of new development in its response to planning consultations.</p>

P OA13.12	Natural England	HRA 2nd response			Natural England welcomes and supports the proposed promotion of sustainable transport (including cycling and walking) to the Lee Valley Park and the commitment to manage visitor pressure (eg. by directing people away from sensitive areas). We agree this will become an increasingly vital role of the LVRPA because of future development in riparian authorities, and provide further advice in our comments above.	Comments welcome	No change
P OA13.13	Natural England	HRA 2nd response	5.83 – 5.85		Natural England also supports the collection of bird and visitor survey data (eg. paragraphs 5.83 – 5.85) to enable further assessment and assist decision-making and management of the Lee Valley Park to ensure designated site and biodiversity objectives are met.	Comments noted and welcomed	No change
P OA13.14	Natural England	HRA 2nd response	5.8.6		5.8.6 – “it is concluded that an LSE on Lee Valley SPA, as a result of public access associated disturbances caused by the Park Plan; Part 1 Strategic Policies update alone and in-combination, can be objectively ruled out at this stage.” Natural England acknowledges the positive track-record of conservation management undertaken by Lee Valley Regional Park Authority for the benefit of Lee Valley SPA (and its constituent and Park-wide SSSI’s). Whilst the Lee Valley Park Plan should not be wholly regarded as ‘necessary to the management of the SPA’, there are local and Park-wide policies that endeavour to significantly assist conservation management of the Lee Valley SPA and to date, these have been regarded as adequate to ensure recreational disturbance enabled by the Lee Valley Park Plan can be discounted as a likely significant effect.	The Authority welcomes the decision that an LSE on the SPA as a result of public access associated disturbances caused by the draft strategic policies can be ruled out.	No change although it should be noted that a number of policies under Biodiversity have been amended and strengthened.
P OA13.15	Natural England	HRA 2nd response	5.8.6		For the reasons set out above, Natural England recognises the significant challenges of the ‘in combination’ context for this Plan, notably effectively managing increasing visitor numbers whilst still ensuring SPA favourable conservation status can be achieved and maintained. Accounting for the LVRPA’s strong track record in conservation management and noting the Lee Valley Park Plan provides a strategic framework with revised policies that clearly promote the protection and enhancement of designated sites and biodiversity and HRA-compliant projects, Natural England can agree with the conclusion of 5.8.6.	The Authority welcomes the decision that an LSE on the SPA as a result of public access associated disturbances caused by the draft strategic policies can be ruled out.	No change although it should be noted that a number of policies under Biodiversity have been amended and strengthened
P OA13.16	Natural England	HRA 2nd response	5.12.11		Air Pollution Natural England agrees with the conclusions of paragraph 5.12.11 – “it is considered that an LSE on Epping Forest SAC, as a result of air pollution caused by the Park Plan; Part 1 strategic policies in-combination with development plans in riparian and neighbouring authorities, cannot be objectively ruled out at this stage.” broadly for the reasons set out in this section of the HRA.	Comments noted, the Authority is carrying out an AA to assess this matter in relation to Air Pollution. Natural England will be involved in this process.	Further changes to policy likely

P OA13.17	Natural England	HRA 2nd response	5.12.11 & 6.3.1	<p>Natural England is currently advising the respective HMA MoU authorities about the scope of their Habitats Regulations Assessments for Epping Forest SAC, and we are awaiting the latest revisions including traffic modelling and air quality assessment from Epping Forest DC. For these HMA assessments, the local road network is the focus of vehicle traffic assessment and this (alongside any uplift associated with the regionally-significant M25) is likely to be relevant to the Lee Valley Park Plan and any further consideration within an Appropriate Assessment. It is recognised by Natural England that the Lee Valley Park is managing a visitor destination as a comparable alternative to Epping Forest SAC and, in so doing, may helpfully reduce visitor pressure (and potentially associated vehicle traffic) on Epping Forest SAC. More visitor survey information is necessary to assess this matter. Natural England can advise further about the scope of an appropriate assessment consistent with paragraph 6.3.1., and suggest that this should involve an initial meeting</p>	<p>Comments noted, the Authority is carrying out an AA to assess this matter in relation to Air Pollution. Natural England will be involved in this process.</p>	<p>Further changes to policy likely</p>
P OA15.0	Transport for London Commercial Development	SP		<p>Thank you for consulting TfL Commercial Development (TfL CD) on the Lee Valley Regional Park Authority (LVRPA) draft Park Development Framework. Please note that the following comments represent the views of TfL CD acting in its capacity as a local landowner and do not form part of a wider TfL statutory response. Our colleagues in TfL Spatial Planning have provided a separate response, in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.</p>	<p>Comments noted</p>	<p>No Change</p>
P OA15.1	Transport for London Commercial Development	SP		<p>TfL CD Objectives. TfL CD has been set an ambitious target by the Mayor to commence the development of 10,000 new homes in London by 2021; at least 50% of these new homes must be genuinely affordable. To meet these objectives, TfL CD has identified sites across London that have capacity to accommodate residential development, including several in close proximity to the Lee Valley Regional Park. Excellent placemaking and 'good growth by design' are at the core of our development projects and we would expect them to respect and enhance the setting of the Park.</p>	<p>Comments noted, the Authority would welcome early engagement on projects and placemaking that relate to development sites in close proximity to the Park.</p>	<p>No Change</p>
P OA15.2	Transport for London Commercial Development	SP	2.3, 2.5	<p>Strategic Context (p4). In paragraphs 2.3 and 2.5, we would suggest reference to the latest (and longer-term) population projections for London as provided in the 2017 draft London Plan, the 2017 Strategic Housing Land Availability Assessment (SHLAA) and 2017 Strategic Housing Market Assessment (SHMA).</p>	<p>Comments noted, the revised figure for population growth in the draft London Plan will also be referenced.</p>	<p>Add the following text to paragraph 2.3 "According to the London Plan, London's population is expected to rise from 8.2 million in 2011; to 9.20 million in 2021; 9.54 million in 2026; 9.84 million in 2031; and 10.11 million in 2036. The draft London Plan 2017 provides a longer term and revised population projection of 10.8 million by 2041.</p>

P OA15.3	Transport for London Commercial Development	SP	2.42 - 2.47	<p>Current Planning Policy Context (P8). We welcome LVRPA recognition that the Park is in an urban context subject to development pressures and located within the LLDC and the Upper Lea Valley Opportunity Area. There are also four Housing Zones situated close to or partly within the Lee Valley Regional Park (Blackhorse Lane and Northern Olympic Park, North Tottenham, Meridian Water and Edmonton Futures, and Poplar Riverside). TfL owns and controls land located within the opportunity areas and housing zones which have great potential to meet the need for additional housing (particularly affordable housing), new jobs and transport enhancements which would improve access to the Park.</p>	<p>Comments noted. Housing zones are referenced under para 2.47</p>	No Change
P OA15.4	Transport for London Commercial Development	SP	2.49, 2.50	<p>Paragraphs 2.49 and 2.50 highlight three objectives of the 2017 draft London Plan. TfL CD would suggest that other key objectives of the draft Plan should also be referred to, including: 'good growth' to deliver thousands of genuinely affordable homes and creating a more inclusive, greener and safer city. In particular, there will be a need for sustainable growth in the London boroughs that border the park in order to meet new housing targets and deliver affordable housing. Policy H1 of the draft Plan requires housing development to be optimised around transport hubs, of which there are many close to the boundary of the Park. The need for good growth and a significant increase in housing delivery in sustainable locations close to the Park could be recognised within the LVRPA in line with the draft London Plan.</p>	<p>Comments noted. The Regional Park is located in a growth corridor, policy therefore seeks to protect the broader amenity of the Park, for example in relation to tall buildings (Policy L5) and large scale development. However additional text is needed to cover 'good growth' objectives and this will be added to the end of paragraph 2.50.</p>	<p>Add new text at the end of paragraph 2.50 as follows: "The draft London Plan also sets an overarching objective to plan for 'good growth' - "sustainable growth that works for everyone" aiming to deliver genuinely affordable homes and a more socially integrated and sustainable city. As part of the Lee Valley Opportunity Area there will be an increase in housing development and densifies close to the Park's boundary. This will create both opportunities and challenges for the Authority, for example to ensure green space and infrastructure within development complement and connect with the Park, to secure enhancements for the Park as part of the development process and strengthen the carrying capacity of the parklands, protect sensitive ecological assets and address flood risk and water quality issues."</p>
P OA15.5	Transport for London Commercial Development	SP	4.27 - 4.32	<p>This approach to higher density in the most accessible and sustainable locations also reduces pressure for development in the Green Belt and on MOL; as such references to 'good growth' adjacent to the Park might be included in paragraphs 4.27 - 4.32.</p>	<p>Comments noted, most of the Park is designated Green Belt or MOL and development already planned adjacent to the Park as well as further potential to develop at other 'sustainable locations' will impact upon the Park, its openness, landscape quality, natural and heritage assets.</p>	No change
P OA15.6	Transport for London Commercial Development	SP	5.4	<p>Strategic Policies (p36). The LVRPA has an important as a statutory consultee on applications for development bordering the LVRPA which might impact upon the Park. Much of the Lee Valley Regional Park is situated within an urban context in close proximity to areas which have been recognised in policy as having the potential to deliver significant amount of new development, particularly housing. It is therefore important that the policies of the LVRPA do not constrain new development and good growth that is located outside of the Park. Indeed they should support the objectives and policies of the draft London Plan and adjoining LPA's Local Plans.</p>	<p>Comments noted. Policies seek to secure the best outcome for the Regional Park, manage development pressure and realise opportunities to enhance the Park and visitor enjoyment.</p>	No Change

P OA15.7	Transport for London Commercial Development	SP	L5	5.6	Conserve and enhance the Park's landscape character, key views and openness (P37). The draft London Plan encourages the delivery of higher density development around transport hubs, which may include tall buildings in suitable locations, subject to a design-led approach assessing the visual, functional and environmental impacts. The relevant LPA will consider the impacts of tall buildings as part of planning application process for proposed development located outside of the Park. The impacts of new development on the Park will be a material consideration in the assessment of planning applications.	Comments noted.	No Change
P OA15.8	Transport for London Commercial Development	SP	L1	5.6	TfL CD will work with LVRPA, LLDC, London boroughs and other relevant stakeholders to ensure that development on our land is appropriately designed in terms of height, scale, massing, the protection of important local views and the impact on nearby Green Belt and MOL.	Comments noted and collaborative working welcomed	No Change
P OA15.9	Transport for London Commercial Development	SP	D3	5.11	Influence major new development within and adjacent to the Park to ensure that the Park is protected and enhanced (P38). TfL CD suggests that D3 should also include reference to other key strategic planning policies of the draft London Plan such as 'good growth' (policies GG1 - GG6), delivering good design (Policy D2) and optimising housing delivery in the most accessible and sustainable locations (policy H1) outside the Park.	Comments noted. However it is considered that Policy D3 is unclear and confusing and given revisions to policies under 5.5 'Effective use and management of land', it will be deleted.	Delete Policy D3 Support development that is consistent with other strategic policies, particularly recreational, leisure and sporting facilities.
P OA15.10	Transport for London Commercial Development	SP			Concluding Remarks. We hope that these representations are helpful and we look forward to working with you in the coming years as we deliver high quality, housing-led, mixed use schemes to meet needs in areas around the Park.	Comments noted and welcomed	No Change
P OA16.0	Transport for London Spatial Planning & Crossrail 2	SP		2.3	This should reference the latest population projections in the new draft London Plan	Comments noted. Text will be amended - see P OA15.2 above	Please refer to amendment above under POA15.2
P OA16.1	Transport for London Spatial Planning & Crossrail 2	SP		2.4	The latest London Plan Strategic Housing Land Availability Assessment (SHLAA) and Strategic Housing Market Assessment (SHMA) should be mentioned here	Comments noted, all the figures are referenced back to the adopted London Plan. There may be further changes to the draft London Plan which is not due for adoption until autumn of 2019. The figures in themselves to not change the fact that the Park will be facing significant growth in visitors due to increase in population growth.	No change
P OA16.2	Transport for London Spatial Planning & Crossrail 2	SP		2.12	It would be beneficial to state here that the upgrade from two to four tracks will also necessitate the closure of any remaining level crossings.	Comments noted, minor amendment will be added to para 2.12	Add the following to the end of paragraph 2.12: It is understood that the upgrade from two to four tracks would require the closure of any remaining level crossings
P OA16.3	Transport for London Spatial Planning & Crossrail 2	SP		2.14	This is not an extension of Crossrail 1 - it is a part of the core route and will also affect the Stratford area of the Lower Lee Valley (in Newham). Include (Elizabeth Line) in brackets because this is how the Crossrail 1 service will be known.	Comments noted, text will be amended to refer to Crossrail (Elizabeth Line) and reference to extension will be removed.	Amend Para 2.14 as follows: The extension of Crossrail 1 (Elizabeth Line) will also affect parts of the Lower Lee Valley in London Borough of Tower Hamlets and Stratford in the London Borough of Newham
P OA16.4	Transport for London Spatial Planning & Crossrail 2	SP		Fig 2.2	Figure 2.2 - The routing of the West Anglia main line is incorrect - it should go to Harlow rather than Hertford East and through Hackney to Liverpool Street. Other railways should also be shown. Proposed 4-tracking should include (part of) Crossrail 2. It would also be helpful to label Liverpool Street station.	Comments noted Fig 2.2 will be amended as requested regarding West Anglia mainline and Crossrail 2.	Amend Fig 2.2 to show correct routing of West Anglia main line and Crossrail 2.

P OA16.5	Transport for London Spatial Planning & Crossrail 2	SP	2.15	Land Value capture is not currently part of the funding model for Crossrail 2. Please remove this section to avoid any misunderstanding.	Comment noted - the last sentence will be deleted	Amend paragraph 2.15 as follows:This is a type of public financing that recovers some or all of the value that public infrastructure generates for private landowners. It is understood that this will form part of the funding model for Cross Rail 2.
P OA16.6	Transport for London Spatial Planning & Crossrail 2	SP	2.37	Although the 2050 Infrastructure Plan provides context it is not part of current policy.	Comments noted	No change
P OA16.7	Transport for London Spatial Planning & Crossrail 2	SP	2.43	Small factual correction "The Olympic Legacy Supplementary Planning Guidance (OLSPG), published in July 2012, and replaces the Lower Lea Valley OAPF where the two areas overlap. This has been taken forward through the adopted Local Plan (2015) prepared by the London Legacy Development Corporation (LLDC). Work has recently commenced on revising this plan." For reference see OLSPG page 9 and Appendix 7.1 about the OLSPG and LLV OAPF boundaries.	Correction noted	Paragraph 2.43 to be corrected as follows: "The Olympic Legacy Supplementary Planning Guidance (OLSPG), published in July 2012, replaces the Lower Lea Valley OAPF where the two areas overlap. This has been taken forward through the adopted Local Plan (2015) prepared by the London Legacy Development Corporation (LLDC). Work has recently commenced on revising this plan."
P OA16.8	Transport for London Spatial Planning & Crossrail 2	SP	2.43	Note that the OAPF is currently being updated.		Add text to the end of paragraph 2.42 as follows: The Lower Lea Valley OAPF is currently being updated.
P OA16.9	Transport for London Spatial Planning & Crossrail 2	SP	4.9 4.37 - 4.40 5.3	4.9/4.37 - 4.40/5.3 - TfL welcomes the desire to have more people travelling by public transport and active modes. It would be useful to reference the target in the draft London Plan and Mayor's Transport Strategy (MTS) for 80% of all trips in London to be by walk, cycle or public transport by 2041. It would also be helpful to state that the LVRPA and riparian authorities will aim to control the supply of car parking and manage it in such a way that people are encouraged to seek alternative means of access where these are available.	Comments noted. A reference to the Mayor's Transport Strategy and target will be added to Section 2 after para 2.48. The Authority promotes public transport as the means of access to all its sites and venues and the major venues all have travel plans (since 2007). The Authority has also recently adopted a Cycling Strategy in partnership with the riparian boroughs and councils. However in many cases convenient and reliable public transport options are not available or viable.	Add text under Section 2 Strategic Context after paragraph 2.48 "The Mayor's Transport Strategy (MTS) includes a target for 80% of all trips in London to be by walk, cycle or public transport by 2041 and this is reflected in the draft London Plan 2017" Renumber subsequent paragraphs.
P OA16.10	Transport for London Spatial Planning & Crossrail 2	SP	4.39	Again it is not an extension to Crossrail 1 but the core route and it should not have any impact on severance in and around the Park. We acknowledge that Crossrail 2 should aim to reduce severance - joint working will be required and we would welcome reference to this. Note: Crossrail is one word rather than "Cross Rail"	Comments noted, reference to Crossrail 1 will be deleted. Text will be added to cover the point made on Crossrail 2 and all references to the word Crossrail will be checked and amended.	Amend text under para 4.39 as follows: In many areas accessibility is hindered by the severance effect of linear infrastructure, including roads, railways and waterways. Unless carefully designed, the Crossrail 1 extension and Crossrail 2 could increase these severance effects. Transport for London acknowledge that Crossrail 2 should aim to reduce severance and joint working will be required to secure this. Ensure use of the word Crossrail appears as one word
P OA17.0	Thames Water	SP		As you will be aware, Thames Water is the statutory water and sewerage undertaker for the majority of the Lee Valley Regional Park (LVRP) and are hence a "specific consultation body" in accordance with the Town & Country Planning (Local Planning) Regulations 2012. As a statutory undertaker in London and the Lee Valley, Thames Water operate, manage and invest in significant water and wastewater infrastructure in the LVRP. We have the following comments on the consultation document	Comments noted	No Change

P OA17.1	Thames Water	SP		<p>General Comments on Water/Wastewater Infrastructure - A key sustainability objective for the preparation of Local Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. New development should be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the National Planning Policy Framework (NPPF), March 2012, states: "Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver.....the provision of infrastructure for water supply and wastewater." Paragraph 162 of the NPPF relates to infrastructure and states: "Local planning authorities should work with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas."</p>	<p>Comments noted - wastewater infrastructure and development will be co-ordinated by the local planning authorities; this is not a matter for the Authority.</p>	No Change
P OA17.2	Thames Water	SP		<p>The web based National Planning Practice Guidance (NPPG) published in March 2014 includes a section on 'water supply, wastewater and water quality' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that "Adequate water and wastewater infrastructure is needed to support sustainable development" (Paragraph: 001, Reference ID: 34-001-20140306). Policy 5.14 of The London Plan, March 2015 is directly relevant as it relates to Water Quality and Wastewater Infrastructure and Policy 5.15 relates to Water Use and Supplies. Policy S15 of the new London Plan draft for Public Consultation, December 2017, relates to water infrastructure.</p>	<p>Comments noted - this is a matter for the local planning authorities.</p>	No Change
P OA17.3	Thames Water	SP		<p>It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.</p>	<p>Comments noted - this is a matter for the local planning authorities</p>	No Change
P OA17.4	Thames Water	SP		<p>Thames Water seek assurance through the Plan that operational development, which will continue to be necessary on operational sites within the Park, will be considered favourably. Policies that seek to protect the openness of the Park should not unduly restrict essential water/wastewater infrastructure provision. Thames Water has a statutory obligation imposed through the Water Industry Act 1991 to treat and supply water. Text should be included in the Local Plan a which states that providing need can be demonstrated then operational development will be considered favourably on operational land.</p>	<p>Comments noted - this is a matter for the local planning authorities to consider.</p>	No change

P OA17.5	Thames Water	SP		<p>The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water's asset plans and as from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.</p> <p>From 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. Our economic regulator Ofwat has published new rules, which say our charges should reflect: - fairness and affordability. - environmental protection - stability and predictability, - transparency and customer-focused service. The changes mean that more of our charges will be fixed and published, rather than provided on application, enabling developers to estimate costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges. We published our new charges on 1 February 2018. Please see our website for further information: https://www.thameswater.co.uk/-/media/Site-Content/Thames-Water/Help-and-Advice/Helpful-literature/accord17/tariff-changes-Feb-2018/Infrastructure-Charges-Schedule-2018-19.pdf</p>	Comments noted	No Change
P OA17.6	Thames Water	SP			Comments noted	No Change
P OA17.7	Thames Water	SP		<p>Thames Water therefore recommends that developers engage with them at the earliest opportunity to establish the following: - The developments demand for water supply and network infrastructure both on and off site; - The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and - The surface water drainage requirements and flood risk of the development both on and off site and can it be met.</p>	Comments noted	No Change
P OA17.8	Thames Water	SP	4.41 4.42	<p>In light of the above comments and Gvt guidance we recommend the Local Plan include the following policy/supporting text: <u>Proposed New Water/Wastewater Infrastructure Text</u>. "Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades. The LVRPA will work with the LPA to seek to ensure that there is adequate water & wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water & wastewater net-work reinforcement requirements. Where there is a capacity constraint the LPA will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development. The development or expansion of water supply or waste water treatment facilities, will normally be supported, either where needed to serve existing or proposed new development, or in the interests of long term water supply & waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised."</p>	Comments noted - the Park Development Framework is not a Local Plan. Proposed water and wastewater infrastructure text should be included in local plans not the Regional Park Authority's Strategic Policy document.	No change

<p>P OA17.9</p>	<p>Thames Water</p>	<p>SP</p>	<p>4.41 - 4.42</p>	<p>Flood Risk and SuDS The NPPF states at paragraph 100 that a sequential approach should be used by local planning authorities to avoid inappropriate development in areas at risk of flooding. The NPPG and Flood & Water Management Act sets out that this applies in areas to be at risk from forms of flooding other than from river and sea including from 'overwhelmed sewers and drainage systems'. Any flood risk strategy/policy should therefore include reference to sewer flooding and an acceptance that flooding could occur away from the flood plain as a result of development where off site infrastructure is not in place ahead of development.</p>	<p>Comments noted</p>	<p>No Change</p>
<p>P OA17.10</p>	<p>Thames Water</p>	<p>SP</p>		<p>It is vital that sewerage/waste water treatment infrastructure is in place ahead of development if sewer flooding issues are to be avoided. It is also important not to under estimate the time required to deliver necessary infrastructure, for example: - local network upgrades take around 18 months - sewage treatment works upgrades can take 3-5 years Thames Water recognises the environmental and economic benefits of surface water source control, and encourages its appropriate application, where it is to the overall benefit of their customers. However, it should also be recognised that SuDS are not appropriate for use in all areas, for example areas with high ground water levels or clay soils which do not allow free drainage. SuDS also require regular maintenance to ensure their effectiveness.</p>	<p>Comments noted</p>	<p>No Change</p>
<p>P OA17.11</p>	<p>Thames Water</p>	<p>SP</p>	<p>4.41 - 4.44</p>	<p>Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change. SuDS not only help to mitigate flooding, they can also help to: - improve water quality, - provide opportunities for water efficiency, - provide enhanced landscape and visual features, - support wildlife, - and provide amenity and recreational benefits.</p>	<p>Comments noted - the Authority supports SuDS and the benefits they can bring in terms of water quality and wildlife and it would be appropriate to add text in support under the new policy F2.</p>	<p>Policy F2 add text to the end of the sentence as follows: "The Authority will... Enhance the Park's function in mitigating and reducing flood risk to the surrounding areas, by natural flood management and sustainable measures, and by supporting SuDS where appropriate."</p>
<p>P OA 17.12</p>	<p>Thames Water</p>	<p>SP</p>		<p>Proposed Change: With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the wastewater system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding. We therefore request that the following paragraph should be included in the Local Plan: "It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."</p>	<p>Comment noted - this wording should be included in the relevant riparian local plans which will then apply to development within the Regional Park when appropriate</p>	<p>No change</p>

P SR26.0	Royal Gunpowder Mills Waltham Abbey Ltd				For clarity, there are two charities with responsibilities towards the site. The Waltham Abbey Royal Gunpowder Mills Charitable Foundation Ltd manages the endowment and is the freeholder. We are the Waltham Abbey Royal Gunpowder Mills Company Limited, and we hold a long lease and manage the site and its visitor attraction and activities. We welcome the direction of the LVRPA strategy, and note its new emphasis on conserving and enhancing the Park's historic environment.	Comments noted and welcomed.	No change
P SR26.1	Royal Gunpowder Mills Waltham Abbey Ltd	SP			We agree that the strategic planning aims set out in the document soundly support the Park's overall vision to be a 'world class leisure destination'. We note the aim to serve as multifunctional green infrastructure resource for London.	Comments noted and welcomed.	No change
P SR26.2	Royal Gunpowder Mills Waltham Abbey Ltd	SP	H1 H2 H3 D3		Conserve and enhance the cultural heritage of the Park and its historic environment. We welcome in particular the new emphasis on cultural heritage and historic environment and increasing access to historic sites, their interpretation, use for leisure, health and recreation, and support of cultural heritage and historic environment by arts, festivals and fairs (Strategic policies H1, H2, H3) and avoidance of detrimental impact on protected of ecological and heritage assets (D2).	Comments and support for policies noted.	No change
P SR26.3	Royal Gunpowder Mills Waltham Abbey Ltd	SP		3.16	Revealing history (3.16): The combined consultation documents state at many points that Lee Valley is rich in heritage assets (largely industrial). Many of the historic sites mentioned in the consultation have connected up with each other as members of the Lee Valley Heritage Alliance (LVHA), and more are joining. It is likely that these heritage assets, as each becomes better known and visitorship grows, will support new types of visitors for the Lee Valley. We suggest that LVHA would be a valuable partner in achieving your strategic aims, including new linkage and integration (Strategic policies A1 – A5), through the 'industrial story' from London to Ware. Each site can contribute interpretation of the industrial landscape features increasing heritage value, identity and image of the Park, and assist achievement of 'revealing history'.	Comments noted - the Authority has acknowledged LVHA as a partner.	No change
P SR26.4	Royal Gunpowder Mills Waltham Abbey Ltd	SP			Conserve and enhance the Park's biodiversity We responded separately to your Biodiversity Action Plan. We have nothing further at this point to add.	Comments noted and thank you for responding to the draft BAP	No change
P SR26.5	Royal Gunpowder Mills Waltham Abbey Ltd	EvB		2.13 - 2.34	Access: Having commented above under 'bridges and access' specifically as it concerns the Royal Gunpowder Mills, we comment here in the broader context of access and countering the north-south linear character by east-west access. We agree that this 'greater connectivity' will enable local and tourist connection. The provision of green routes to Network Rail and TFL stations will encourage and improve local and tourism flow across the Lee Valley Regional Park and eliminate, for example, the existing approach to the Royal Gunpowder Mills and Waltham Abbey via an unattractive, busy road.	Noted and agreed	No change
P SR26.6	Royal Gunpowder Mills Waltham Abbey Ltd	EvB		2.3	Suggested amendment underlined: Walking para 2.30 There is limited accessibility between The Royal Gunpowder Mills and adjoining routes and sites such as the Lee Navigation and Cheshunt Marsh.	Amendment noted	Amend text under para 2.30 of the Evidence Base as follows: "There is limited accessibility between the Royal Gunpowder Mills and adjoining routes and sites such as the Lee Navigation and Cheshunt Marsh".

P SR26.7	Royal Gunpowder Mills Waltham Abbey Ltd	EvB	4.36	Sites providing access to nature. 4.36 Located just south of Cornmill Meadows is Royal Gunpowder Mills site. The chemicals and pollutants that were once integral to the site's productive activities are no longer due to decontamination of the land. Decontamination works removed the bulk of chemicals and pollutants from areas of the site, most notably at the south, allowing a visitor attraction to be established. Guided tours. The site now supports limited public access to woodlands (Waltham Abbey Woods SSSI) in which a range of flora and fauna thrive including a population of fallow deer. The canopy has largely regenerated here from coppice stools and is dominated by Alder trees, with Sycamore, Ash, Poplar and Crack Willow.	Amend text at para 4.36 of the Evidence Base as follows: "Located just south of Cornmill Meadows is the Royal Gunpowder Mills site. The chemicals and pollutants that were once integral to the site's productive activities are no longer due to decontamination of the land. Decontamination works removed the bulk of chemicals and pollutants from areas of the site, most notably at the south, allowing a visitor attraction to be established. Guided tours. The site now facilitates supports limited public access to woodlands (Waltham Abbey Woods SSSI) in which a range of flora and fauna thrive including a population of fallow deer. The canopy has largely regenerated here from coppice stools and is dominated by Alder trees, with Sycamore, Ash, Poplar and Crack Willow.
P SR26.8	Royal Gunpowder Mills Waltham Abbey Ltd	EvB	6.17	Industrial heritage -A key site is at Gunpowder Mills, Waltham Abbey, which includes 21 listed buildings including the Grade 1 listed Gunpowder Incorporating Mill. The site was used for over 300 years for explosives and propellant manufacture. The...	Amend text at para 6.17 of the Evidence Base as follows: "A key site is at the Royal Gunpowder Mills, Waltham Abbey, which includes 21 listed buildings including the Grade 1 listed Gunpowder Incorporating Mill. The site was used for over 300 years for explosives and propellant manufacture."
P SR26.9	Royal Gunpowder Mills Waltham Abbey Ltd	EvB	6.27	Protecting and enhancing the heritage resource. There are also likely to be other areas where the heritage has yet to be realised within the Park.	Minor amendment noted
P SR28.0	Markfield Beam Engine & Museum	SP	2.3	Para 2.30 indicates: "Paragraph 126 of the NPPF indicates that planning authorities should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats." MBEAM would argue that the MBEAM facilities and wider site are very much in danger. Maintaining and operating a working Victorian beam engine is a costly business - and is extremely difficult to support from public donations - and is not something that readily attracts charity grant funding support. Additionally, the surrounding site (which comprises rare original features of a Victorian sewage works, remains unprotected and neglected. The Museum Trust would very much like to bring this within the control of the Museum in order to be able to provide a full picture of a Victorian public health facility (Tottenham was one of the earliest pioneering communities to develop its own sewage works in 1852). A further potential danger to the site comes from the Crossrail 2 proposals, in which tunnelling alignment passes within metres of the MBEAM buildings and site, with serious potential to undermine this heritage asset.	No change Comments and issues regarding the wider site and Crossrail 2 proposals noted.
P SR28.1	Markfield Beam Engine & Museum	SP	3.16	Para 3.16 denotes the significance of local industrial heritage, but fails to include MBEAM - which as noted above, is an important pioneering example (praised by social reformer Edwin Chadwick and engineer Joseph Bazalgette). It also has a history related to contagious diseases in London.	Amend text at para 3.17 to add at the end of the paragraph, the following : At Tottenham the Markfield Beam Engine and Museum features a Grade 2 listed engine hall housing a restored, working steam-powered beam engine dating from 1888. The building is set in Markfield Park, in the grounds of the former Tottenham Sewage Works once a key public health facility serving the area (1850's to 1964) - together an example of industrial heritage of social and engineering importance.

P SR28.2	Markfield Beam Engine & Museum	SP		3.22	<p>Para 3.22 indicates: "Appreciation of heritage features contributes positively to the identity and image of the Park, as well as increasing the attractiveness of the Park for visitors. However, there are a number of features where heritage value could be enhanced. There remains potential to improve accessibility and interpretation at sites including East India Dock Basin, Rye House Gatehouse and Royal Gunpowder Mills." The examples given again fail to include MBEAM – which must be a significant asset worthy of enhancement.</p>	<p>Comments noted and agreed ; the MBEAM will be added as a further example under para 3.22</p>	<p>Amend text under 3.22 as follows: "There remains potential to improve accessibility and interpretation at sites including Markfield beam Engine & Museum, East India Dock Basin, Rye House Gatehouse and Royal Gunpowder Mills."</p>
P SR28.3	Markfield Beam Engine & Museum	SP	H1, H2	5.3 5.7	<p>The Strategic planning aims identified in Para 5.3 indicate the need to: "Conserve and enhance the cultural heritage of the Park and its historic environment." This is further elaborated in Para 5.7: "H1: Conserve and enhance the Park's cultural heritage, including its archaeology, historic buildings and structures and their settings. H2: Support proposals to enhance access to and interpret heritage assets, recognising their value in providing opportunities for leisure, health and recreation." MBEAM must be included in this strategy.</p>	<p>Comments noted and agreed</p>	<p>No change</p>
P SR28.4	Markfield Beam Engine & Museum	EvB		3.24	<p>The Policy Evidence Base Document further identifies the above case: "Enjoying and learning about heritage 3.24 The Park offers a number of opportunities to enjoy heritage in the Park. This is covered in more detail in the next section. A key feature is the Markfield Beam Engine and Museum housed in its original Grade II listed engine house in Tottenham."</p>	<p>Comments noted</p>	<p>No change</p>
P SR28.5	Markfield Beam Engine & Museum				<p>We note the statement in the 2011 Adopted Proposals for Area 3, which indicates support for the MBEAM. Some 7 years later, little has materialised from LVHA to demonstrate that support. Further comments are a reflection of that situation. In general, whilst MBEAM benefitted from Haringey's Lottery Grant efforts some 10 years ago, this enabled provision for restoration work. However, there has been minimal wider support from public authorities to bolster the voluntary-only management of the Museum in operating a public facility of significant heritage value. Much remains in need of further work and development to realise the full potential of the Museum, beam engine and the wider site for public benefit and to pay its full part in the life of the Lee Valley. MBEAM is also a Member of the Lee Valley Heritage Alliance.</p>	<p>Comments Noted - these apply to adopted Area 3 proposals not the subject of this consultation. However they provide a useful context to the comments made above regarding the Strategic Policies and have been noted. Area 3 Proposals will be revised in the next few years.</p>	<p>No change to Policy documents.</p>
P SR28.6	Markfield Beam Engine & Museum	SP			<p>The Museum Trust remains available to liaise with the LVPA, and explore how support for MBEAM in line with the declared policy intentions can be made a reality.</p>	<p>Comments noted and welcomed</p>	<p>No change</p>
P SR30.0	Sport England	SP			<p>Thank you for consulting Sport England on the Lee Valley Regional Park Plan: Part 1 Strategic Policies. Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields.</p>	<p>Comments noted</p>	<p>No change</p>

P SR30.1	Sport England	SP		<p>The new Sport England Strategy 'Towards An Active Nation' (2016-21) identifies key changes in the delivery of the strategy. -Tackle inactivity: more money and resources</p> <ul style="list-style-type: none"> -Invest in children and young people to build positive attitudes to sport and activity -Help those currently active to carry on, but at a lower cost to the public purse -Put customers at the heart of what we do/be welcoming and inclusive -Help sport to keep pace with the digital expectations of customers -Encourage stronger local collaboration to deliver a joined-up experience for customers -Working with a wide range of partners, using our expertise and investment to align -Applying behaviour change principles to encourage innovation to share best practice. <p>Sport England has assessed this consultation in the light of Sport England's Planning for Sport: Forward Planning guidance http://www.sportengland.org/facilities-planning/planning-for-sport/</p>	Comments noted	No change
P SR30.2	Sport England	SP		<p>The overall thrust of the statement is that a planned approach to the provision of facilities and opportunities for sport is necessary, new sports facilities should be fit for purpose, and they should be available for community sport. To achieve this, our objectives are to: - PROTECT sports facilities from loss as a result of redevelopment</p> <ul style="list-style-type: none"> - ENHANCE existing facilities through improving their quality, accessibility and management PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future. 	Comments and Sport England objectives noted	No change
P SR30.3	Sport England	SP		<p>Sport England believes that sport has an important role in modern society and in creating sustainable and healthy communities. Sport and physical activity is high on the Government's national agenda as it cuts across a number of current topics that include health, social inclusion, regeneration and anti-social behaviour. The importance of sport should be recognised as a key component of development plans, and not considered in isolation.</p> <p>The following comments are provided within the context of:</p> <ul style="list-style-type: none"> • The National Planning Policy Framework (DCLG, 2012). • Sport England's Planning for Sport webpages (2016). 	Comments noted and supported.	No change

P SR30.4	Sport England	SP	1.5-1.9	<p>Strategic content - it is positive that the plan takes into account the proposed increases to the wider population surrounding the park. It is also encouraging that the plan also notes the current tests to the parks existing policies. It is our thought that the plans vision and policies could be strengthened by the inclusion of a specific policy to protect, provide and enhance sports facilities in line with paragraph 74 of the NPPF the park is well supported by evidence to support a policy along these lines as the surrounding Local authorities of East Hertfordshire, Broxbourne, Epping Forest, Haringey and Newham have an adopted PPS, and Enfield, Hackney and Waltham Forest are working towards a robust and up to date evidence base. The park could use this alongside the surrounding LA's Built Facilities strategies to aid the park to obtain contributions from developments in the area to maintain the existing and provide additional sports facilities to meet demand.</p>	<p>Comments noted, policy does need to be amended to strengthen its reference to sports provision, please refer to the revised policy V3.</p>	<p>Work with stakeholders to promote and enhance existing sports facilities and venues. Support site and facility development sympathetic to the wider parklands. that integrates sporting venues with the wider parklands to support a diverse visitor offer.</p>
P SR30.5	Sport England	SP	1.11	<p>It is positive that an evidence base has been produced for the park and Sport England supports the use of this background document which provides evidence and up to date information on the provisions for sport and recreation. We would like to suggest the inclusion of the evidence bases produced by the surrounding local authorities as these provide an in depth look at playing pitches and built facilities within the local area and will identify deficiencies and surpluses in accordance with paragraph 74 of the NPPF.</p>	<p>Comments noted and this is a reasonable method for the local planning authorities in meeting their needs and deficiencies. The Authority's focus is on its existing regional and national sporting venues and priority sports..</p>	<p>No change</p>
P SR30.6	Sport England	SP	2.18	<p>This policy relates to the authority's powers to dispose of land which is "not required for the purpose of any of their functions" when decisions are made about which locations will be brought forwards, it is requested that consideration be given to whether any of the sites contain existing sports or recreation facilities such as playing fields which justify protection under paragraph 74 of the NPPF. If they do, then the extent of development in these locations should account for the need to maintain such facilities and site policies should require the facilities to be protected or replaced.</p>	<p>Comments noted. A sites sports and/or recreational use will be considered as part of the decision making process under the Authority's Land and Property Strategy. Any future changes of use or development will need to be undertaken in accordance with the local planning authority development management policies and Local Plan requirements.</p>	<p>No change</p>
P SR30.7	Sport England	SP	2.39, 3.34, 4.39-4.40, 4.45-4.46	<p>2.39 - Natural Capital Accounts for Public Green Space, 3.34 - connecting people with places, 4.39 - 4.40 - pedestrian and bicycle access and 4.45-4.46 - improving health and well-being. - Sport England considers that the design of where communities live and work is key to keeping people active and placemaking should create environments that make the active choice the easy choice. Therefore, it is positive that the plan highlights the capital gains that are provided through the provision of the park, connecting greenspace and facilities. This helps to highlight the importance of open spaces to public health and wellbeing.</p>	<p>Comments noted and welcomed</p>	<p>No change</p>

P SR30.8	Sport England	SP	2.39, 3.34, 4.39- 4.40, 4.45- 4.46	<p>Sport England would support that these policies are strengthened to have a positive impact on the health of the community by incorporating Active Design and its principles within these policies. Sport England along with Public Health England have launched our revised guidance, Active Design, which intends to inform the urban design of places, neighbourhoods, buildings, streets and active open spaces to promote sport and active lifestyles. The guide sets out ten principles to consider when designing places that would contribute to creating well designed healthy communities and therefore would contribute to the Vision and Strategic Objectives expressed within the Plan. Sport England recommend that the links between the Local Plan and Active Design are enhanced and are really drawn out by having clear references to Active Design, its principles and the Active Design Checklist within the Plan, more information on Active Design, including the guidance, can be found via the following link: http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/</p>	<p>The Authority welcomes the Active Design guidance and principles from Sport England and will consider using these guidelines as a strategic tool for planning and design of our open spaces and travel routes. The Authority already contributes significantly to cycling and walking routes throughout the Park, many of these being used by the community for pleasure and for travel links. Our on-going strategy is to improve our community spaces throughout the Park, considering areas around public shelters and physical activity areas. Where possible the Authority will look to work with key partners on the co-location of community facilities. The Area proposals provide more detail.</p>	No change
P SR30.9	Sport England	SP	4.45 - 4.46	<p>Improving the range and quality of sport facilities and services within the park - Sport England welcomes the principle of new sports, open space and recreation development. To ensure the level of new provision is appropriate the plan should utilize the surrounding authorities evidence. For example, an up to date PPS would estimate the nature and level of needs that may be generated from new development(s) for sporting provision; and establish clear deliverable actions (with associated costs) that have the potential to help meet the need identified. The above approach takes a positive and evidenced based approach for the provision of outdoor sports facilities in accordance with NPPF paragraphs 70 and 73.</p>	<p>Comments noted. The Authority does not produce a PPS but would work with the relevant local planning authorities to ensure new development provides adequately for any increased need whilst safeguarding existing sport and recreation provision.</p>	Please refer to the amendments made to V3 above.
P SR30.10	Sport England	SP	5.3	<p>Strategic Planning Aims – it is positive that the plan includes a strategic aim to improve accessibility of the park for pedestrians and cyclists as this will encourage active transport. Sport England would recommend that the plan seeks to ensure that the sports facilities are given the same consideration by including a strategic aim to protect and enhance the existing sports facilities within the park and provide new facilities to meet demand.</p>	<p>Comments noted and agreed policy is not clear on sports facilities that exist within the Park. Policy V3 has been revised accordingly.</p>	<p>Policy V3 to be revised as follows: "Work with stakeholders to promote and enhance existing sports facilities and venues. Support site and facility development sympathetic to the wider parklands, that integrates sporting venues with the wider parklands to support a diverse visitor offer."</p>
P SR30.11	Sport England	SP	5.12	<p>Improve accessibility - Sport England welcome the objective to promote and facilitate safe environments for pedestrians and cyclists and increasing opportunities for such travel as this contributes to active and healthy communities. Sport England would support that these policies are strengthened by incorporating Active Design and its principles within these policies.</p>	<p>Comments welcomed - please refer to the response above under P SR 30.8 in respect of Active Design.</p>	No change

P SR31.0	Susstrans	SP	<p>Sustrans is the charity making it easier for people to walk and cycle. We are engineers and educators, experts and advocates. We connect people and places, create liveable neighbourhoods, transform the school run and deliver a happier, healthier commute. Sustrans works in partnership, bringing people together to find the right solutions. We make the case for walking and cycling by using robust evidence and showing what can be done. We are grounded in communities and believe that grassroots support combined with political leadership drives real change fast. Sustrans welcomes the opportunity to comment on the Lee Valley Regional Park Authority (LVRPA) 'Strategic Planning' document.</p>	Comments noted	No change
P SR31.1	Susstrans	SP	<p>The National Cycle Network (NCN) is a network of safe, traffic-free paths and quiet on-road cycling and walking routes. Its 14,000 miles criss-cross the country, linking up villages, towns and cities. The Network is used by almost five million people a year and runs into town centres, past schools and through stunning countryside from Cornwall to the Shetland Isles. Despite its name, the NCN is popular with walkers, joggers, wheelchair users and horse riders as well as people on bikes.</p>	Comments noted, the Authority would endorse the popularity of the NCN especially where it links into and through the Park.	No change
P SR31.2	Susstrans	SP	<p>Key facts about the NCN :</p> <ul style="list-style-type: none"> • Half of trips made on the National Cycle Network are by people walking. • Over 27 million journeys on the Network are made by children travelling to and from school. • 165 million commuting journeys are made on the Network. • One in five people using the Network are new to cycling or starting to cycle again. • Over 85% of people who use the Network feel fitter as a result. • Over 50% of people using the Network feel it helps them save money. 	Comments noted	No change
P SR31.3	Susstrans	SP	<p>In 2014 the National Cycle Network brought the following benefits:</p> <ul style="list-style-type: none"> • Almost 30 million car trips were replaced by people choosing to travel on the Network, meaning less congestion, noise pollution and CO2 emissions. • The Network saved the UK economy over £160 million by reducing the impact of obesity and overweight with £22 million of this saved from the NHS budget. • Holidays and days out on the Network generated £650 million for the economy and supported more than 15,000 jobs. 	Comments noted	No change

P SR31.4	Sustrans	SP	<p>Two key NCN routes run along the River Lea and through the Lee Valley Regional Park (LVRP): NCN 1 (Queen Elizabeth Olympic Park to Roydon) and NCN 61 (Rye House to Ware) (Fig 1 provided shows routes). Sustrans is currently carrying out a review of the National Cycle Network, assessing the Network's present physical condition using our recently completed nationwide audit. We will use this information to work with partners to call on governments for dedicated and ongoing funding for the development and maintenance of existing walking and cycling routes, including the National Cycle Network. We believe that some parts of the Network could and should be better identified, safeguarded and maintained and we urge all local authorities and land owners to prioritise this to ensure more people are able to walk and cycle.</p>	<p>Comments noted. The PDF Area Proposals seek to identify sections within the Park that require enhancement and the Authority's Cycle Strategy provides more detail on cycle path enhancements and co-operative working to aid delivery.</p>	No change
P SR31.5	Sustrans	SP	<p>Acknowledgement of the NCN and its existing and future importance to the Park and its visitors. Sustrans supports LVRPA's recognition of the importance of sustainable transport (2.23) and commitment to improving accessibility to the Park for pedestrians and cyclists (5.12). This aligns with the Mayor's Transport Strategy (2018), which states page 21 'Making alternative transport options accessible and appealing to all Londoners is the key to reducing car dependency. This means improving street environments to make walking and cycling the most attractive options for short journeys'. Walking and cycling routes through LVRP play a significant role in making active travel accessible and appealing to residents of North-East London and Hertfordshire. The existing and future importance of the NCN to the LVRP and its visitors should therefore be acknowledged in the updated Strategic Planning document</p>	<p>Comments noted and agreed. Paragraphs 4.37 to 4.40 should recognise the importance of NCN - drawing on detail in the Evidence Base and the Cycling Strategy</p>	<p>Add the following text at the end of paragraph 4.40. "The principle cycling route, which covers almost the entire length of the Park is the national Cycle Route NCN route 1, which becomes NCN61 for the northernmost section of the Park. For the most part it is on traffic free routes providing access to a wide range of sites and venues within the Park and linking in with other routes. Important to visitors this route together with the other walking and cycling routes also play a role in making active travel accessible and appealing to residents of north east London and Hertfordshire.</p>
P SR31.6	Sustrans	SP	<p>Commitment to maintain and improve NCN route surfaces, signage, lighting and accessibility, including removing/modifying barriers and addressing severance issues. The Strategic Plan should also outline commitments from LVRPA to improve and maintain the following aspects of NCN routes within the park: Surfacing: Commitment to maintain and improve NCN route surfaces. For example, we are aware of pot-holed, water-logged, poor quality surfacing between Springfield Park and Markfield Park (shown in Figure 2). Sustrans understands that this stretch of land belongs to the Canals and Rivers Trust, however, we ask LVRPA to collaborate with partners and landowners in order to rectify poor surfacing and to recognise the severity of the issue. Sub-standard surfacing both deters walking and cycling and disproportionately adversely affects the disabled. It also creates risk of injury. Sustrans urges the Strategic Plan to commit to ameliorating poor surfacing, working with landowners to bring it up to the quality detailed in the London Cycling Design Standards (LCDS chpt 7)</p>	<p>Comments noted. The detail about cycle path improvements and measures to address this are set out in the Authority's Cycle Strategy April 2017. The Authority supported LB of Waltham Forest in securing £2.5 million for improvements along Coppermill Lane and other areas to improve cycling and walking opportunities to the Regional Park from Walthamstow. This includes some changes to the aqueduct cycle/pedestrian route</p>	No change

P SR31.7	Sustrans	SP	A5	5.12	<p><u>Wayfinding</u>: Sustrans welcomes LVRPA's aim to 'enhance signage and wayfinding to improve access to and movement within the Park' (5.12: A5). Some NCN signage is monitored by Sustrans volunteers. There is an opportunity for Sustrans and LVRPA to collaborate in order to ensure that poor or missing NCN signage is reported and replaced in a timely fashion and that signage is in line with the LCDS Chpt 6. We ask LVRPA to commit to review, monitor and replace signage along walking and cycling routes.</p> <p><u>Accessibility/Severance</u>: Sustrans welcomes LVRPA's commitment to improve accessibility to the Park via walking, cycling and public transport. It is concerning that survey data shows 'around two thirds arrive by car' (4.9). Healthy Streets for London (2017) and the Mayors Transport Strategy (2018) both suggest that cycling and walking should be prioritised over car driving in order to increase public health, tackle poor air quality and enable London's growing population to move efficiently and freely around the capital. Sustrans ask that LVRPA commit to reducing the number of car journeys made by visitors to the park, in compliance with the Mayor's Transport Strategy.</p>	<p>Comments noted. The Authority will continue working with key partners such as Sustrans and volunteers to ensure any issues arising concerning waymarking, path maintenance etc are dealt with in a timely fashion. This is however a management issue and too detailed for a strategic policy document. The Authority's Cycling Strategy April 2017 looks in more detail at these matters</p>	No change
P SR31.8	Sustrans	SP		4.9	<p>Sustrans welcomes LVRPA's acknowledgement that certain accessibility and severance issues exist (4.39, 4.40) and its commitment to 'work in partnership to reduce the severance caused by linear infrastructure, through the creation of pedestrian and cycle bridges and crossing points.' (5.12: A2). For example, Horseshoe Bridge and Coppermill Lane Underpass on Quietway 2, which is aligned through Walthamstow Marshes, are two examples of barriers to accessibility of cycle routes. We are aware that many of the bridges within the park do not belong to LVRPA (e.g. Horseshoe Bridge which belongs to the Canals and Rivers Trust), which is why we welcome LVRPA's commitment to work in partnership to rectify these issues.</p>	<p>Comments noted and welcomed</p>	No change
P SR31.9	Sustrans	SP	A2	4.39 - 4.40 5.12	<p>Sustrans asks LVRPA to commit to the review and implementation of recommendations for changes concerning barriers and obstacles within the park, with specific reference to accessibility for all users, including those on adapted or enlarged cycles and wheelchairs. Figure 3 included with response is a table that provides detailed issues and costing for resolving barriers and obstacles at following locations: Lea Bridge Rd to the west of Connaught Close, Coppermill Lane parking, Walthamstow Marshes Rail Underpass, to the west of Low Hall Lane Sports Ground.</p>	<p>The detailed comments provided by Sustrans are noted regarding barriers and obstacles and will be considered by officers. These are too detailed for inclusion in the Strategic Policy document. The Authority's Cycling Strategy April 2017 includes measures to address cycle path quality issues including removing barriers, enhancing surface conditions, missing links and lists specific improvements that are needed. This will require co-operative working with a number of partners.</p>	No change
P SR31.11	Sustrans	SP		2.7	<p>Recent improvements to surfacing of towpaths and construction of new bridges, engendered by the 'Olympic Legacy' (2.7), have been commendable, however, the same quality should be applied further north of LB Hackney and LB Newham, along NCN 1 and NCN 61 (within LVRPA's jurisdiction).</p>	<p>Comments noted - this is an important but detailed matter and therefore not appropriate for the Strategic Policy document. PDF Area Proposals identify sections of the Park where access improvements are required. The Authority's Cycling Strategy April 2017 also commits the Authority to working with partner organisations to improve the quality of paths for cycling.</p>	No change

<p>P SR31.12</p>	<p>Sustrans</p>	<p>SP</p>	<p>Lighting: Sustrans would like LVRPA to commit to improved lighting on NCN routes. We understand that there are legitimate ecological reasons for keeping lighting low, particularly in certain wildlife-rich areas, however we ask that LVRPA explore wildlife-friendly lighting solutions, as lack of lighting on cycling and walking routes makes them unsafe and inaccessible, particularly in the winter months. Successful examples of low-impact lighting used include:</p> <ul style="list-style-type: none"> • Newham Greenway: LB Newham have installed lighting and CCTV columns over 5km in an off-highway green route surrounded by trees, which was formerly a dark corridor. They also installed solar LED uplighter studs in some sections. The lighting was designed to minimise impact on bats and other nocturnal wildlife. • Wandie Trail: LB Merton installed 'low level' lighting which helps to create a safe and secure route after dark, reduces risk of impact on wildlife corridors, uses high quality, low energy, long-life LED equipment and can be electrically controlled to balance ecological and human needs.' • Riding Lane: The London Borough of Ealing was the first London Borough and UK Local Authority to install the innovative 'FalcoPatfinder' solar powered LED cycle path lights. 	<p>Comments noted, this matter is addressed in the Authority's adopted Cycling Strategy April 2017. This recognises that artificial lighting is not appropriate for much of the Park's cycling network, due to its disturbance of wildlife. However the strategy also states that it may be considered for certain key sections that are used by more commuters. In these sections sensitive lighting schemes or luminous road markings would be an appropriate intervention to increase safety for cyclists. Policy D2 as revised would apply.</p>	<p>No change</p>
<p>P SR31.13</p>	<p>Sustrans</p>	<p>SP</p>	<p>Increased cycle parking in line with The Draft New London Plan and the London Cycling Design Standards. Sustrans welcomes reference to the London Plan and supports the inclusion of the following objectives in the Strategic Policies document:</p> <ul style="list-style-type: none"> • Improving connections to and between open spaces, to create an integrated network of green space. (2.36) • Ensuring that the green space network within the area supports the development of healthy communities. (2.36) • Promoting Healthy Living – improving health outcomes by increasing physical activity, reducing stress, provision of tranquil areas and removing pollutants. (2.37) • Encouraging Active Living – increasing levels of walking and cycling. (2.37) 	<p>Comments noted</p>	<p>No change</p>
<p>P SR31.14</p>	<p>Sustrans</p>	<p>SP</p>	<p>Cycle Parking: Sustrans urges a commitment to provision of cycle parking within the document, as detailed in policy T5 of The New London Plan (2017) and in line with the LCDS (Chapter 8), particularly in the vicinity of visitor centres, cafes etc</p>	<p>Comments noted the Authority's Cycling Strategy, April 2017 commits the Authority to increasing the provision of cycle parking throughout the Park, at key attractions, gateways and by supporting the development of cycle hubs in neighbouring boroughs/districts. The Authority will also be guided by the local planning authorities when providing cycle parking as part of new venue and visitor centre development and comply with policy in the relevant Local Plan</p>	<p>No change</p>

P SR31.15	Sustrans	SP	2.44 - 2.47	<p>Maximum Car Parking: Commitment to push local riparian boroughs and developers to adhere to maximum car parking allowances in new developments bordering the Park, in line with The Draft New London Plan.</p> <p>The Strategic Policies document highlights significant planned development and redevelopment in several areas along the River Lea and Lee Valley (2.44-2.47). While we recognise that LVRPA are unlikely to be responsible for construction of new developments, we encourage LVRPA to push for new developments within London to comply with recommended car parking maximums, detailed in Policy T6 of the Draft New London Plan.</p>	No change
P SR31.16	Sustrans	SP	2.39	<p>Commitment to increase active travel within the Lee Valley Regional Park, in order to achieve the following objectives outlined in Healthy Streets for London and the Mayor's Transport Strategy:</p> <ul style="list-style-type: none"> a. Reduce inactivity b. Improve air quality c. Limit the city's contribution to climate change d. Develop attractive local environments e. Reconnect local communities <p>Sustrans welcome LVRPA's recognition of the many health and wellbeing benefits provided by increased physical activity (3.29). 'Healthy Streets for London' (2017) informs us that if all Londoners walked or cycled for 20 minutes a day, this would save £1.7 billion in NHS treatment costs over 25 years. The Mayor's Transport strategy identifies that increased active travel would 'deliver at least an additional 60,000 years of healthy life in prevented illness and early death each year'. As the Strategic Planning document pertains, LVRP is 'the largest concentration of publically accessible open space in the region' (3.3), covering over 4000 hectares. This combined with the many leisure activities LVRP offers, makes it an existing hub of physical activity and provides further opportunity to offer a place for communities to walk and cycle, provided that infrastructure and accessibility are up to standard.</p>	Comments noted and welcomed
P GI 37.0	Save Lea Marshes Individual	SP		<p>I have read the Lee Valley Regional Park Draft Strategic Planning Policies. It contains many sentiments we support. However, we cannot endorse this document: sentiments are not strategies. You do not tell us what you actually plan to do.</p>	Comments noted
					No change

P GI 37.1	Save Lea Marshes SP Individual	L5, L6, L7	5.6	<p>Furthermore, it seems pointless to engage with a document that contains sentiments that stand in sharp contrast to the day-to-day actions of the Lee Valley Park Authority. To take just one example: Page 37 contains the following three statements: • L5: Resist tall buildings within the Park and consider the impacts of proposed tall buildings adjacent to the Park, in light of a full landscape and visual impact assessment. • L6: Protect views that promote a sense of orientation and/or appreciation of the natural and physical environment of the Lee Valley. • L7: Protect the openness of the Park, which is predominantly designated as Green Belt or Metropolitan Open Land. Now compare these statements to the decision taken in December 2017 to submit two parcels of well-used and well-loved Metropolitan Open Land within the boundary of the Park to the London Borough of Waltham Forest's call for sites for development. Your Chair, Paul Osborn, and your Chief Executive, Shaun Dawson, have both stated that they would like to sell this land for housing, which necessarily means tower block. This is not behaviour that suggests tall buildings will be resisted within the Park. It is not behaviour that suggests views will be protected. And it is certainly not behaviour that suggests the openness of the Park will be protected.</p>	<p>The strategy is in line with the Authority's statutory remit which seeks to balance the pressures and challenges faced in the context of the growth agenda and the planning policies of riparian authorities.</p>	No change
P GI 37.2	Save Lea Marshes SP Individual			<p>Experience tells us that, as an organisation, the Lee Valley Regional Park will use the sweeping statements contained in this document to justify just about anything. For this reason, we object wholeheartedly to the strategy.</p>	Objection noted	No change

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