Lee Valley Regional Park Authority

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Park Development Framework Strategic Policies

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Prepared by LUC

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Executive Summary

Extending north from East India Dock Basin for 26 miles, and broadly aligned with the natural course of the river Lea through east London and Essex to Ware in Hertfordshire, the Lee Valley Regional Park presents a rich tapestry of award winning international sports venues, attractive parklands and areas of significant ecological importance. The Park attracts over 7 million visits each year largely drawn from London, Hertfordshire and Essex but given the international status of its venues increasingly from across the United Kingdom and abroad.

The Regional Park lies at the centre of one of Europe's largest regeneration areas which includes London 2012 and its Legacy, major developments in the lower Lee Valley, Meridian Water and a range of large schemes coming forward in Epping Forest District and the Borough of Broxbourne. The Authority's adopted policies date from 2000 and, given the Regional Park's rapidly changing context, a new approach is required.

The Strategic Aims and Policies, Landscape Strategy and Area Proposals included in the Park Development Framework are designed to respond to this changing context to ensure that the Regional Park can maintain its role as an exciting and dynamic destination which caters for leisure, recreation and the natural environment over the next 10-15 years.

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1 Introduction

Role and purpose of the Strategic Polices

- 1.1 The Lee Valley Regional Park and the Lee Valley Regional Park Authority (LVRPA) 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 50 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: 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 Olympic and Paralympic Games 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 Lea 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, 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 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 Olympic and Paralympic Games 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 Paralympic Games and its legacy

- 2.6 A key part of the legacy of Olympic and Paralympic Games s 2012 (the 2012 Olympics) 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 (Lee Valley VeloPark and Lee Valley Hockey and Tennis Centre) and 35% of the parklands on QEOP, 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.

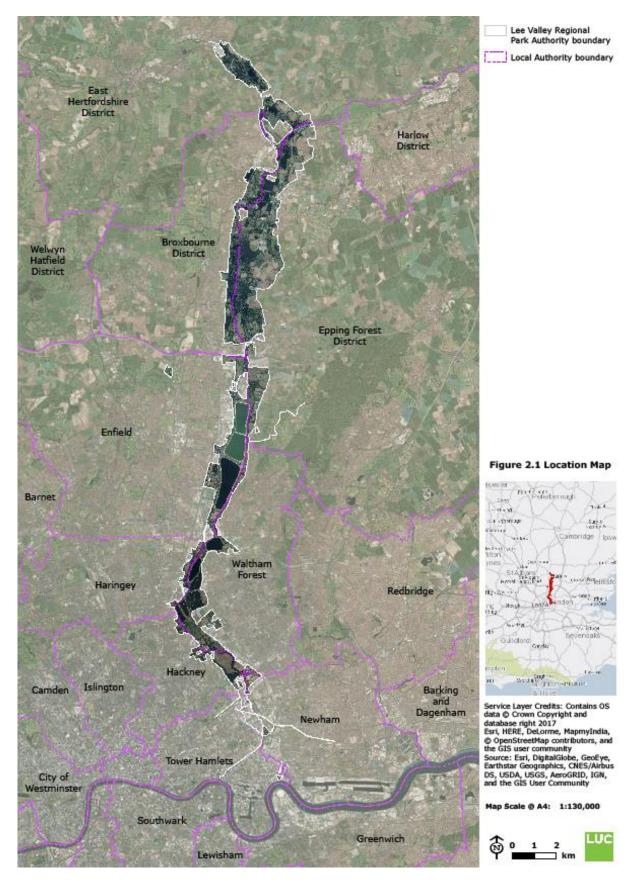
London Stansted Cambridge Strategic Growth Corridor

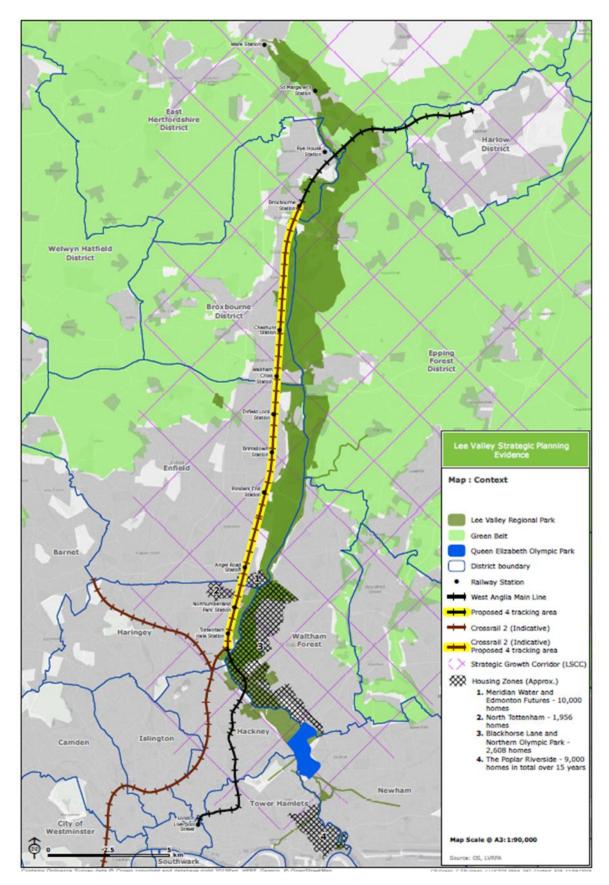
- 2.8 The London Stansted Cambridge Corridor Consortium is a partnership of public and private organisations covering the area north of Tech City, the City Fringe, Kings Cross, and the Queen Elizabeth Olympic Park, up through the Lee Valley and M11/A10, and West Anglia rail corridors to Harlow and Stansted, and through to Cambridge.
- 2.9 The partnership was formed to organise and promote an economic area, with strong interconnections; 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 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







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.

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 and Property 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

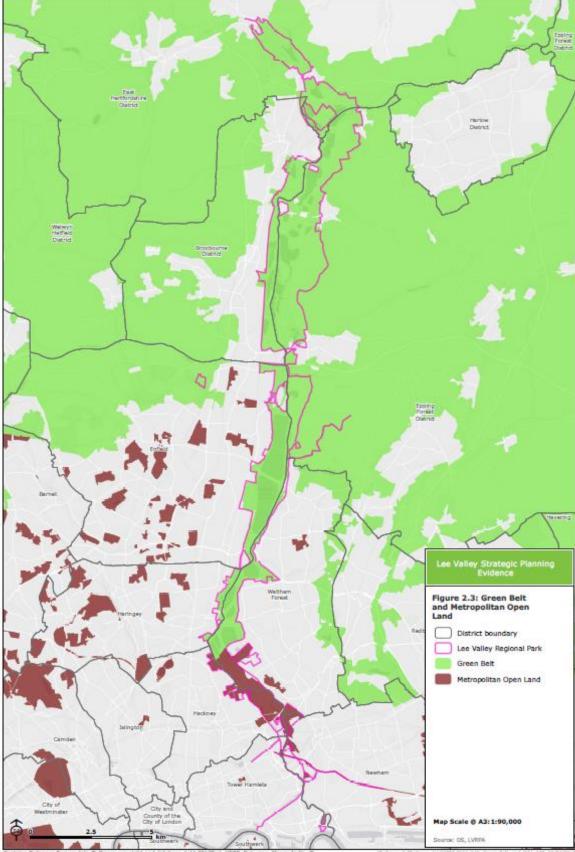
- 2.22 The NPPF (2019) provides overarching planning policy for England. It identifies that the purpose of the planning system is to achieve sustainable development which is defined with reference to economic, social and environmental roles. The Regional Park has an important part to play in the delivery 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 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). This reflects Sir Patrick Abercrombie's original 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). 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 Once exceptional circumstances for Green Belt release have been defined:
 - prioritisation should be given to the release of Green Belt land that has been previouslydeveloped and/or well-served by public transport (para. 138);
 - the release of Green Belt land should be appropriately offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land (para. 138).
- 2.28 Para. 138 indicates that, where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previouslydeveloped and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.
- 2.29 Para 141 also 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.



Green Belt and MOL designations protect the openness of the Park





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Conserving and enhancing the natural environment

- 2.30 The NPPF does not refer specifically to regional parks, but paragraph 170 confirms that the planning system should contribute to and enhance the natural and local environment by:
 - 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);
 - 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;
 - 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 new and existing development from contributing to, 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

- 2.31 Paragraph 185 of the NPPF indicates that plans 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. This strategy 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

- 2.32 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 updated NPPF 2019.
- 2.33 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) as well as being an important part of the landscape and setting of built development (NPPF para 7-10)'.¹ 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 assess the need for sport and recreation facilities.² Furthermore local authorities have the 'duty to cooperate'³ where open space serves a wider area.⁴

¹ https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space

² <u>http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/</u>

³ https://www.gov.uk/guidance/duty-to-cooperate

⁴ https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space

2.34 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'.⁵

London Plan

- 2.35 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 wellbeing.
 - 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).
- 2.36 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.
- 2.37 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;
 - 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;
 - 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.
- 2.38 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 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.

⁵ <u>https://www.gov.uk/guidance/natural-environment</u>

- 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.
- 2.39 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

2.40 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 'wellbeing' and climate change mitigation. On the basis of the report's findings, London's open spaces contribute £5 billion per annum. Extrapolating from this work it is estimated that the Regional Park has a value of £250m per annum with additional benefits to those areas of the Regional Park in Hertfordshire and Essex. 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 levy contribution of £0.81 (for 2019-2020) per capita per annum for each resident of the sub region.

The Mayor's Opportunity Areas in London

Lower Lea Valley Opportunity Area Planning Framework

- 2.41 The Lower Lea Valley Opportunity Area Planning Framework was published by the then 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.
- 2.42 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

- 2.43 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 Leeside 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

- 2.44 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.
- 2.45 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.
- 2.46 Four Housing Zones are situated close to or partly within the Lee Valley Regional Park. These are⁶:
 - London Borough of Waltham Forest Blackhorse Lane and Northern Olympic Park 2,608 homes
 - London Borough of Enfield Meridian Water and Edmonton Futures 10,000 homes⁷
 - London Borough of Haringey North Tottenham 1,956 homes
 - London Borough of Tower Hamlets the Poplar Riverside, 9,000 homes in total over 15 years (ref London Borough of Tower Hamlets Housing Delivery Strategy Sept 2017)

London Environment Strategy

- 2.47 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
 - 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 29 November 2017. Formal consultation took place between Friday 1 December 2017 and Friday 2 March 2018. Following the Examination process in early 2019 it is anticipated that the plan will be published in autumn 2019.

⁶ <u>https://www.london.gov.uk/sites/default/files/housing_zones_brochure_march_2016_5.pdf</u>

⁷ <u>https://new.enfield.gov.uk/news-and-events/edmonton-housings-33-million-boost/</u>

- 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 which is being prepared alongside the plan.

3 Spatial Portrait: the Lee Valley Regional Park today

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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, the Park is interspersed with various leisure venues with some pockets of residential, and commercial development.
- 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

- 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 water features within the valley are significant 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. 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 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 has 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 and its legacy 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 three Lee Valley Camping and Caravan sites together with the YHA London Lee Valley provide a choice of affordable visitor accommodation within the Park.
- 3.27 The Park is also used extensively for informal recreation, particularly walking, 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, the creation of the Queen Elizabeth Olympic Park and the success of the legacy venues.

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



The Queen Elizabeth Olympic 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 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 wellbeing⁸.
- 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); Amwell, Rye Meads, Turnford and Cheshunt Pits, Walthamstow Reservoirs, Waltham Abbey Woods, Cornmill Stream and Old River Lee, Chingford Reservoirs, and Walthamstow Marshes. The first four of these together form the Lee Valley Special Protection Area (SPA) and Ramsar site.

⁸ Forest Research (2010) *Benefits of green infrastructure*

- 3.32 Walthamstow Wetlands is a 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.



Walking route through Lee Valley

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.

Table 3.1: Ecosystem services provided by the LVRP

Ecosystem services	Key stakeholders and beneficiaries
Supports biodiversity	The region's population
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.	Riparian Authorities
	Natural England
	Thames Water
	London Wildlife Trust
	Herts and Middlesex Wildlife Trust
	Essex Wildlife Trust
	Canal and River Trust
Connects people with nature and the countryside	Park users
The predominantly natural and semi-natural character of the	Riparian Authorities
Park allows people to experience the countryside and connect with nature close to where they live.	National Health Service
	Thames Water
vidence suggests that access to good quality natural green ace has a number of associated benefits to health and ellbeing, including increased life expectancy and reduced health equality, promotion of psychological health and mental well- eing. ⁹	Canal and River Trust
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.	
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.	
Provides a sense of openness and tranquillity	Park users
The natural character and lack of buildings affords a strong sense of openness and tranquillity, which are important for well-being and spiritual nourishment. ¹⁰	Riparian Authorities
Ensuring openness and tranquillity is particularly important for southern part of the Park, which is bordered by increasingly dense urban development.	
Keeps the air clean	The region's population
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. ¹¹	Riparian Authorities The National Health Service London City Airport and Stansted airport, both of which make considerable contribution to
The Park's wide expanse of vegetation plays a role in keeping the air clean. Trees and other vegetation are recognised as being	particulates in London

 ⁹ Forest Research (2010) Benefits of Green Infrastructure. Available at http://www.forestry.gov.uk/pdf/urgp_benefits_of_green_infrastructure.pdf
 ¹⁰ Environmental Protection UK (2010) Quietening Open Spaces: Towards Sustainable Soundscapes for the City of London. ¹¹ 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
able to filter particulates and gaseous pollutants so improving the quality of air in and around green spaces. $^{12\ 13}$	
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.	
Increases physical activity through formal and informal activities The Park has built sports facilities, open spaces, cycle and	Sub-regional catchment Riparian Authorities National catchment for major events
footways, and waterways facilitate active lifestyles. 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. ¹⁴	Park users National Health Service Sport England
Heat amelioration 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.	Park users Riparian Authorities Sub regional catchment
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. ¹³	
Creates opportunities to learn	Sub regional catchment
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	Riparian Authorities Schools and Universities
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. ¹⁵	
Boosts the local economy	Sub regional catchment
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.	Riparian Authorities

 ¹² 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
 ¹³ Forest Research (2010) Benefits of Green Infrastructure. Available at http://www.forestry.gov.uk/pdf/urgp_benefits_of_green_infrastructure.pdf
 ¹⁴ Sport England website. Benefits of Sport.

¹⁵ Natural England Commissioned Report (2016). Learning in the Natural Environment: Review of social and economic benefits and barriers.

Ecosystem services	Key stakeholders and beneficiaries
The Authority and its leisure contractor together currently employ just over 400 full time staff. 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. ¹⁶	
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. ¹⁷	
Protects London from flooding	Sub regional catchment
The presence of green open spaces in the Park helps protect	Riparian Authorities
London from flooding, due to a reduction in surface run-off. 18	Environment Agency
Hard flood defences such as the Lee Flood Relief Channel also play a role in protecting the region from flooding. ¹⁹	Private utility companies e.g. Thame Water ²⁰ , National Grid with vested interest in protecting against flood damage. ²¹ Network Rail ²² Land development companies
Appreciation of heritage	Park users
The presence of different heritage features in the Park instils an	Riparian Authorities
appreciation of heritage which is linked to a number of other	Historic England
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	Local communities
leeper sense of collective identity, linked to sense of place. ²³ Enhancing appreciation of heritage also has economic benefit hrough the creation of jobs. Research by the Heritage Lottery Fund suggests that heritage accounts for 1.28 million jobs in the JK.	
Supplies water to London	Sub regional catchment
The reservoirs managed by Thames Water in the Park contribute significantly to water supply in London.	Riparian Authorities

¹⁶ Sport England (2013). Economic value of sport in England. Available at: <u>www.sportengland.org/media/3174/economic-value-of-</u> sport-summary.pdf

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 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 ¹⁹ 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 ²⁰ Thames Water (2016). What Causes Sewer Flooding. Available at: <u>https://www.thameswater.co.uk/help-and-advice/drains-and-</u>

sewers/sewer-flooding-who-to-contact/what-causes-sewer-flooding²¹ National Grid (2014). 'Staying high and dry': Article outlining risks of flooding to National Grid.

http://nationalgridconnecting.com/staying-high-and-dry/

Network Rail (no date). How flooding effects the railway. Available at https://www.networkrail.co.uk/running-the-railway/lookingafter-the-railway/delays-explained/flooding/ 23 Values and benefits of heritage: a research review by HLF Strategy & Business Development Department, April 2016.

Ecosystem services	Key stakeholders and beneficiaries
	Thames Water
Provides food	National and Sub regional catchment
commercial food production is significant in the north of the ark, particularly through the operation of glasshouses.	Riparian Authorities
	Lea Valley Growers Association
Community food production, through allotments and community gardens, also takes place in the Park.	Lee Valley Farm
	Local communities

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 financial strategy the Authority has had a 'levy policy' for the last decade which seeks to reduce the amount of money raised from this source, for example in January 2017 a levy decrease of 6 per cent for 2017/18 was approved, the seventh consecutive year the levy has reduced and to an amount significantly below the current rate of inflation. For 2019-20 the levy amounts to £0.81 per head of population in the region which amounts to a total of £9.6m.

Implications of the Authority's Land and Property Strategy

- 4.5 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.
- 4.6 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

- 4.7 In the year 2015-16 visitor data there were just over 6.5 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.
- 4.8 The majority of visitors come from the riparian authorities. This is based on a three year average from 2013-2016. 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.
- 4.9 Over a quarter of the visitors were aged 55+. A very small proportion (5%) was aged between 16 and 24. The age profile of other visitors was evenly spread between the age groups in between (see Figure 2.6 in the Evidence Base). While some venues are popular with younger people (e.g. Lee Valley Ice Centre), there is significant potential to increase the number of visits by younger people.

- 4.10 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.
- 4.11 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.
- 4.12 A further challenge of increased visitor numbers is to encourage people to use less frequented areas and avoid exacerbating visitor 'hot spots'.



Walthamstow Wetlands attract a wide range of visitors of all ages

Designation of the Park as Green Belt or Metropolitan Open Land

4.13 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. Whilst the designations protect the openness of the Park, they apply significant constraint on the type and scale of development that can take place within it.

Green Belt

- 4.14 Para. 133 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'.
- 4.15 Para. 145 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, cemeteries, and burial grounds and

allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;

- *g) limited infilling or the partial or complete redevelopment of previously developed 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 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'.
- 4.16 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.
- 4.17 The NPPF emphasises in para. 136 that 'once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. 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.
- 4.18 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 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'.
- 4.19 The NPPF states that "Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, 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).
- 4.20 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.²⁴
- 4.21 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).
- 4.22 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

4.23 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.

²⁴ 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

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.
- 4.24 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.
- 4.25 Both MOL and Green Belt, designations present challenges to the Authority in terms of how development is brought forward.

Development pressures close to and within the Park

- 4.26 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.
- 4.27 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.
- 4.28 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.
- 4.29 Such development has the potential to adversely affect the Park's natural and 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. 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 heritage assets, as well as revealing significance 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.
- 4.30 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 Lee 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.

4.31 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.



Lee Valley Regional Park

Large-scale agriculture and industrialisation of the landscape

4.32 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 glasshouses²⁵ and smaller-scale sustainable food production including allotments and community growing initiatives²⁶. 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.²⁷

Habitat conservation and enhancement

- 4.33 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.
- 4.34 The concept that development proposals should minimise their impact on biodiversity and deliver a 'net gain' in biodiversity (NPPF para 170) 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.

²⁵ Lee Valley Growers Association (no date). Article currently illustrating demand for glasshouses. <u>http://www.lvga.co.uk/lea-valley-growers-win-national-awards/the-future-of-the-lea-valley-glasshouse-industry/</u>
²⁶ Making Local Food Work (2012) Food from the upper frince. Local approximation of the lea-valley state of the upper frince. Local approximation of the lea-valley state of the lea-valley state of the lea-valley state.

²⁶ 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

²⁷ Lee Valley Regional Park Authority (2000). Lee Valley Regional Park Plan: Part 2: Strategic Policy Framework, p. 47.

4.35 Furthermore the Park could become a 'receptor site' for biodiversity off-setting²⁸. 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.



Cycle route

Accessibility and way marking

- 4.36 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.
- 4.37 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, and Lea Bridge also require improved route provision and signage.
- 4.38 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. Transport for London acknowledges that Crossrail 2 should aim to reduce severance and joint working will be required to secure this.

²⁸ Biodiversity offsetting is a system used predominantly by <u>planning authorities</u> and <u>developers</u> to fully compensate for <u>biodiversity</u> impacts associated with <u>economic development</u>, through the <u>planning process</u>. In some circumstances, biodiversity offsets are designed to result in an overall biodiversity gain. Offsetting is generally considered the final stage in a <u>mitigation</u> 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 <u>habitat</u> that is likely to be affected by a proposed project. Then, they will establish a new location or locations (often called <u>receptor sites</u>) where it would be possible to re-create the same amount, type and quality of habitat.

4.39 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.

Water resources, flood mitigation and climate change

- 4.40 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.
- 4.41 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).
- 4.42 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.
- 4.43 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

- 4.44 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.
- 4.45 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 it 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 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 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 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.

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

5.7 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.

Conserve and enhance the Park's biodiversity

5.8 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.

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

5.9 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 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 facilities. 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.

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

5.11 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: 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.

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

5.12 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 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.