

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

P LA3.3	EFDC	SP		4.1 - 4.46	The document sets out a great deal of context, a spatial portrait and a section on key challenges and opportunities which are regarded as: a. Financial pressures. b. Visitor numbers and activities. c. Designation of the Park as Green Belt or Metropolitan Open Land - including the challenge to bring forward development that furthers the Park's own interests. d. Development pressures close to and within the Park - including the need for careful management to prevent disturbance to the SPA and other habitats underlining the need to ensure that sufficient local play and amenity space is provided in adjacent developments. e. Large scale agriculture and industrialisation of the landscape - including that whilst they bring benefits glasshouses can detract from landscape benefits such as openness, natural character and green open space. <i>continued below</i>	Noted	No change
P LA3.4	EFDC	SP		4.1 - 4.46	f. Habitat conservation and enhancement - including the suggestion that the Park could become a receptor for biodiversity offsetting. g. Accessibility and way marking - including the limited number of current access points and the severance effects of railways. h. Water resources, flood mitigation and climate change - the Park being a key resource for flood management and water storage. i. Improving health and wellbeing - including improving the number of people with access to the park, the facilities within it and the management of unkempt areas. The Park's adopted vision is to be 'a world class leisure destination' and the strategic policies seek to improve the quality and accessibility of the Parks sport and leisure facilities and the wider parkland setting. It highlights the role as "a multifunctional green infrastructure resource for London, which should be conserved and enhanced	Comments noted	No change
P LA3.5	EFDC	SP		5.3	The strategic planning aims are: <ul style="list-style-type: none"> • Ensure the effective use and management of land. • Conserve and enhance the Park's landscape character, key views and openness. • Conserve and enhance the cultural heritage of the Park and its historic environment. • Conserve and enhance the Park's biodiversity. • Protect and make best use of the Park's water spaces. • Increase the attractiveness and use of the Parkland and venues. • Influence major new development within & adjacent to the Park to ensure that the Park is protected and enhanced. • Improve accessibility and entrances to the Park for pedestrians and cyclists and Q via public transport. There are strategic policies under each of these aims are reproduced at Annex 1 of this report for ease of reference. 	Noted	No change
P LA3.6	EFDC	SP			<u>Overall Comments.</u> All of the strategic policies are relevant to the functions and aspirations of the District Council and on the whole they chime with the aspirations and policies of the EFDC Local Plan Submission Version 2017. In particular support to tourism and visitors to the District and the protection of biodiversity and heritage are particularly valued by the Council.	Comments and support noted	No change

P LA3.7	EFDC	SP	L5, L6		The Council appreciates the efforts made to resolve some of the concerns expressed previously through amendments to the framework proposals. However with respect to the current proposals there remain matters where there may be conflicts in the implementation of policy objectives between the LPA and LVRPA. First with regard to Strategic Policies L5 and L6 i.e. 'L5: Resist tall buildings within the Park and consider the impacts of tall building adjacent to the Park, in light of a full landscape and visual impact assessment' and 'L6 Protect views that promote a sense of orientation and/ or an appreciation of the natural and physical environment of the Lee Valley'.	Comments noted. Please see below for further response.	No change
P LA3.8	EFDC	SP	L5, L6		The primary concern in this respect is the potential impact on protected horticulture in the District since modern glasshouse development is indeed tall. The Park currently contains glasshouses and they also sit on the Park boundary. EFDC will consider proposals within the context of its own planning policies and it has been proven through case law that the openness of the Green Belt is not a material factor in respect of horticulture in the Green Belt. [An appeal against the findings of a Judicial Review of Valley Grown Nurseries 1 application requested by the Lee Valley Regional Park Authority has clarified this issue in relation to glasshouse development and concluded that because agricultural development is not inappropriate development as such it cannot be harmful to the openness of the Green Belt.]. Maintaining the openness of the Park is unlikely to be considered so material as to outweigh the need for food production. Whilst there are outstanding objections to the LPSV "Policy E 3 Food Production and Glasshouses", the Council seeks to support the industry through its planning policies to expand and thrive and indeed has taken a more relaxed approach to location in the LPSV than in previous Local Plans.	Comments noted. Policies L5 and L6 apply across the Park and are informed by the Landscape Character Assessment. They will be applied judiciously and are aimed primarily at large scale residential development that will impact the Park and which is becoming a feature of certain areas of land on the boundary of the Park. Detailed Area Proposals provide a more site specific response in relation to those areas of the Park where glasshouse developments are located.	Note revisions to Policy L5 which is now renumbered as L3 - refer to detail below. Also L6 now becomes L4. Revised L3 as follows: L3 Require full landscape and visual assessments to be made of all proposals for tall buildings for sites both within and adjacent to the Park. Resist tall buildings within the Park and consider the impacts of proposed tall buildings adjacent to the Park, in light of a full landscape and visual impact assessment.
P LA3.9	EFDC	SP	D1		In addition, the key set of policies supporting the aim "to influence major new development within and adjacent to the Park to ensure that the Park is protected & enhanced" are greeted with caution as follows: a. In respect of "D1 Work in partnership with the riparian authorities on Green Belt and Metropolitan Open Land reviews and policy development, with a view to protecting open land around the Park, while meeting development aspirations". It should be noted that it is incumbent upon EFDC to operate national Green Belt policy in consideration of built facilities in the Park. The level of built facilities proposed in the Green Belt was a matter of concern raised in 2015 in respect of Area Proposals that does not appear to have been addressed in this version of the PDF.	Comments noted. The policy, D1 is worded to highlight the importance of working with the riparian authorities in relation to the green belt and MOL and development proposals. The Council raised concerns to Area 6 Proposals during the previous round of consultation, in terms of development within the District but without mentioning any specific sites. Area 6 proposals refer to improved provision for sport (sailing, angling) and visitor facility development (at River Lee Country Park), all of which would be progressed through the planning system with due regard to the green belt and other designations.	No change
P LA3.10	EFDC	SP	D2		b. With regard to "D2 Work in partnership with riparian councils to ensure the nature of new development on site both within and adjacent to its boundary enhances the Regional Park in line with its draft strategic policies and avoids detrimental impact on protected ecological and heritage assets". Naturally the Council supports the aim of avoiding detriment to ecological and heritage assets, however, the approach should not be used to stifle the viability and vitality of existing commercial uses in the Park and adjacent to its boundaries in line with allocations for employment use in the EFDC LPSV and with regard to the glass house industry.	The landscape quality and character of the Park, its heritage and ecological assets, many of which are formally protected are a key reason why people visit and enjoy the Park. The heritage and ecological aspects are an intrinsic part of the Park's landscape adding value to adjoining residential and business areas. Policy seeks to ensure these values are both protected and enhanced through new development.	No change as a result of these comments but note that D2 is renumbered as D3 and has been amended in response to other comments - see LA5.1 for example.

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P LA3.11	EFDC	SP	D4		In addition, "D4 Secure funding for Park Improvements through the riparian authorities' planning obligations". The Council has not discussed the possibility of this matter with the LVPA although this has been raised in Representation to the LPSV. It is unlikely that, given the other requirements to provide infrastructure and mitigation on European Sites, that there will be any significant financial gain from planning obligations agreed in the District that would finance the LVRPA activities beyond the matter of biodiversity protection.	Comments noted, the Authority is party to the cross boundary discussions within the region being led by EFDC and work to produce a mitigation strategy in relation to the European Sites. Visitor pressure on the Lee Valley SPA raises similar issues that will require mitigation via planning obligations or similar. However policy D4 has been deleted, and replaced with a new policy specific to the Epping Forest SAC and which deals with comments made by Natural England.	No change but note that D4 has been deleted and replaced with the following policy: D4 Working with the London Mayor and riparian Boroughs/Districts explore opportunities to designate sites within the Park to allow access to natural green space designed to offset adverse impacts of new development on the Epping Forest SAC.
P LA4.0	Essex CC Spatial Planning				Essex County Council welcomes many of the policies and proposals contained within the draft amended Park Development Framework (PDF) and notes and acknowledges the amendments made in respect of concerns raised in February 2015 to an earlier draft of the Area Proposals. Specific comments on each element of the consultation are provided below.	Comments noted [<i>this is a comment that applies to all consultation documents</i>]	No change
P LA4.1	Essex CC Spatial Planning	SP			<u>Draft Strategic Planning Policies.</u> It is recommended that the Authority maintain discussions with EFDC to ensure the approach is not used to stifle the viability and vitality of existing commercial uses in the Park and adjacent to its boundaries, in line with land used for glasshouses and allocations for employment use in the Epping Forest District Council Local Plan Submission Version (EFDC LPSV) (2018).	Noted, the Authority has ensured that EFDC (as with other riparian authorities) is involved with all stages of the PDF process and has held regular discussions on key matters such as visitor facilities, glasshouses, the Local Plan and issues relating to protected sites. The Authority regularly attends the Six Authority's meetings where cross boundary issues are discussed.	No change
P LA5.0	Herts CC Environment & Infrastructure	SP			Thank you for the opportunity to comment on the above. This letter relates to the services of the Environment & Infrastructure Department, which also incorporates other services provided by the county council where relevant.	Comments noted and welcomed	No change
P LA5.1	Herts CC Environment & Infrastructure	SP		2.22	<u>Natural, Historic and Built Environment</u> The county council has the following comments to make in relation to 'landscape' and the 'historic environment'. <u>Landscape</u> Park Plan: Part 1: Strategic Policies. Paragraph 2.22 acknowledges that the Park has an important role to play in the delivery of sustainable development, and touches upon it briefly in terms of transport, eco-system services and food production. It is suggested that there is also an opportunity to embed sustainability in the strategic policies, and a requirement to use sustainable construction techniques and materials in the delivery of new development within the Park.	Sustainable design and management are key components of the Authority's Environmental Strategy 2011. However it would be helpful to clarify this position in relation to the Strategic Policies so a new policy renumbered as D2 has been included. The original D2 is now D3 and has also been amended.	Add new policy as D2: Ensure that development proposed within the Park is of the highest environmental standards. Renumber D2 as D3 and amend as follows: "Work in partnership with riparian councils to ensure that the nature design and layout of new development on sites both within the Regional Park and adjacent to its boundary: a) Enhances the Regional Park, in line with its draft strategic policies and 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."
P LA5.2	Herts CC Environment & Infrastructure	SP	L1 - L7	5.6	The aim to 'Conserve and enhance the Park's landscape character, key views and openness,' and the strategic policies to achieve this aim, are fully supported, and include the vital 'hooks' to the landscape character assessment, and landscape and visual impact assessment.	Comment and support welcomed	No change
P LA5.3	Herts CC Environment & Infrastructure	SP		5.3	<u>Historic Environment</u> The county council supports the inclusion of the conservation and enhancement of the cultural heritage of the Park and its historic environment as one of the strategic planning aims set out in the Development Framework (Part 1 Strategic Policies).	Support welcomed	No change

P LA5.4	Herts CC Environment & Infrastructure	SP	H1 - H3	5.7	The county council also supports the stated intention that: <i>"The Park Authority will: H1: Conserve and enhance the Park's cultural heritage, including its archaeology, historic buildings and structures and their settings. H2: Support proposals to enhance access to and interpret heritage assets, recognising their value in providing opportunities for leisure, health and recreation. H3: Work with other bodies to support art, festivals and fairs".</i>	Support welcomed	No change
P LA5.5	Herts CC Environment & Infrastructure	EvB		6.1 - 6.27	It is noted that the Evidence Base included with the draft strategic policies includes a well-informed summary of the key features and attributes relating to heritage within the Park, under Chapter 6: Landscape and Heritage. Chapter 6 also highlights some of the key issues associated with the Park's historic assets notably: - the potential for new development to adversely affect the integrity, setting and special character of heritage assets; and, - opportunities to enhance the character of the Park's historic landscapes and townscapes by conserving and managing the setting, special character and accessibility of the Park's historic assets and views.	Comments noted and welcomed	No change
P LA5.6	Herts CC Environment & Infrastructure	EvB			In this context, it is noted that the draft amended Area Proposals for the Regional Park Areas 6, 7 and 8 include Landscape and Heritage as one of the themes examined in relation to each proposal, and the proposals demonstrate a clear recognition of the value of several important heritage assets within the Park, such as the Royal Gunpowder Mills, Waltham Abbey, Rye House Gatehouse, Emma's Well, the New River, and the Lee Navigation.	Comments noted as relevant to Policies as well as the Area Proposals	No change
P LA5.7	Herts CC Environment & Infrastructure	EvB SEA SP			The county council also notes that since, in addition to these known heritage assets, new sites are identified on a regular basis throughout the county, it is highly likely that currently unknown heritage assets are present within areas of the Park that have not been subject to prior disturbance/mineral extraction etc.. It is also possible that some of these assets may be of comparable significance to already designated assets, such as Scheduled Monuments, and should be treated as such (NPPF paragraph 39). The draft proposals have not been amended in this regard.	Noted and agreed, but as stated previously the Authority does not have the expertise or resources to identify these 'hidden' assets. Development proposals will be required through the local authority planning application process to carry out all necessary surveys with regard to heritage assets. Policy H1 has been amended in response to other comments and makes reference to conserving and enhancing the Park's 'historic environment' including its 'landscapes' and their settings.	No change in response to this comment. However please refer to OA11.9 below, which refers to the following amendments to H1 where the wording 'historic environment' has been added allowing for a wider interpretation of heritage assets: "Conserve and enhance the Park's historic environment and cultural heritage, including its archaeology, historic buildings, and structures, landscapes and their settings."
P LA5.8	Herts CC Environment & Infrastructure	SEA SP			Furthermore, in meeting the requirements of the Strategic Environmental Assessment Regulations, the environmental report should examine the likely significant effects on the environment of implementing the plan, in its identification and evaluation of a range of issues. Among these is cultural heritage, including architectural and archaeological heritage. The SEA Framework (Table 3.1) however solely includes, as Strategic Environmental Assessment 10, the intention 'To maintain and enhance existing known heritage while seeking their full potential as visitor attractions or stimuli for regeneration'. This again demonstrates that the draft proposals do not recognise the potential for the Park to contain currently unknown heritage assets, or indeed the varied nature of the undesignated heritage assets known to be present within the Park.	Comments noted and as stated above unfortunately the Authority does not have the expertise or resources to identify these 'hidden' assets. Development proposals will be required through the local authority planning application process to carry out all necessary surveys with regard to heritage assets. Policy H1 has been amended in response to other comments and makes reference to conserving and enhancing the Park's 'historic environment' including its 'landscapes' and their settings.	Please refer to amendments described above.

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P LA5.9	Herts CC Environment & Infrastructure	SEA SP	H1		The draft proposals do not therefore fully represent heritage assets with archaeological interest, or reflect the current policy framework provided by the NPPF and supporting guidance. The county council recommends that the proposals should be revised to ensure the conservation and enhancement of both designated and undesignated heritage assets and to provide for the potential impact of intended development and land management proposals upon such assets (e.g. construction of visitor facilities, remediation of contaminated land, the introduction of short term rotation coppice, etc.), via appropriate mitigation. It is also recommended that 'landscape heritage assets' should be referred to as heritage assets.	Comments noted. Development proposals will be required through the local authority planning application process to carry out all necessary surveys with regard to heritage assets. Policy H1 has been amended in response to other comments and makes reference to conserving and enhancing the Park's 'historic environment' including its 'landscapes' and their settings.	No change other than amendments to H1 as set out under OA11.9
P LA6.0	Enfield	SP			Enfield supports many of the draft strategic policy and aspirations outlined in the draft Park Plan. In particular, the draft policies on improving access, increasing attractiveness, enhancement and protection of water spaces and the effective use and management of land are welcomed. As an adjacent Riparian authority, we welcome the benefits provided by the Lee Valley for our residents and visitors to Enfield and we are happy to build upon our relationship based on our mutually beneficial ambitions and shared objectives. We have set out a few comments which I hope you find useful.	Comments and support welcomed	No change
P LA6.1	Enfield	SP	L5		Draft Policy L5 as drafted is of some concern as it could constrain higher density and taller development in or close to the park area. This represents a change from the existing Park Plan which makes no explicit policy reference to 'tall' buildings. As drafted the Policy may have implications for Enfield's challenge to meet significant housing and regeneration growth, including the growth aspirations set out in the Mayor's Upper Lee Valley Opportunity Areas Planning Framework (ULVOAPF) which is now due to be reviewed in light of the proposition of Crossrail 2 and significant infrastructure investment in the Upper Lee Valley corridor. Enfield would welcome some redrafting of the policy wording in Policy L5 to introduce some flexibility and welcomes the opportunity to work in partnership with Lee Valley Regional Park Authority, the Mayor of London and others to secure investment in the Upper Lee Valley corridor. The Draft Park Plan should recognise that this may include taller development, only where this is considered to be appropriate and in accordance with all relevant policies contained within adjoining Local Authority Local Plans, the London Plan and those within the Park Plan.	Policy L5 now renumbered as L3 applies to the whole Park and is informed by the Landscape Character Assessment which defines the Regional Park as having distinct qualities differentiating it from the surrounding urban fabric. It is these qualities which this policy seeks to protect. The term 'resist' has been removed from the policy text, however tall buildings proposed adjacent or close to the Park will still need to be considered in the light of landscape and visual impact assessments as would be expected as part of the planning process. The Authority recognises the challenges facing local authorities in meeting significant housing and regeneration growth, particularly those within the Upper Lee Valley Opportunity Area. Tall residential buildings adjacent to the Regional Park gain an added 'value' or benefit from their proximity to and the views out over the Regional Park. However these views out across the valley, the openness of the Park, the visual connectiveness of open and green spaces are the key to the Park's attractiveness and underpin its enjoyment by people contributing to their well being, whether they visit for active sport, informal recreation or are just passing through. Tall buildings within the Park can interrupt and undermine these values and detract from the Park's landscapes.	Amend Policy on tall buildings, previously L5 but now renumbered as L3 as follows: L3 Require full landscape and visual assessments to be made of all proposals for tall buildings for sites both within and adjacent to the Park. Resist tall buildings within the Park and consider the impacts of proposed tall buildings adjacent to the Park, in light of a full landscape and visual impact assessment.
P LA6.2	Enfield	SP		2.44	The Park Authority, being a statutory consultee, has been involved in the progress of the Edmonton Leaside AAP at all stages of production. The draft Plan identifies the regeneration of Meridian Water and mentions this at paragraph 2.44 in the wider context of the Upper Lea Valley Opportunity Area Planning Framework. Ponders End regeneration is also mentioned and recognised as part of the wider ULV OAPF. Enfield welcomes these inclusions, and sees them as necessary, and suggests that greater reference be given to Crossrail 2 and the review of the ULV OAPF by the Mayor of London as a growth opportunity for the whole Corridor in this paragraph.	Comments noted and agreed. Add text to para 2.44 to note the review process.	Paragraph 2.44 to be amended with the addition of the following text as a final sentence: "The GLA is in the process of revising this document which is likely to reflect its new regeneration priorities and refer to Crossrail 2" .

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P LA6.3	Enfield	SP		4.27 - 4.32	Development pressures close to and within the Park on page 31 should also be recognised as opportunities for enhancement and greater accessibility to the Park for neighbouring communities, particularly in Enfield where residents in the east of our borough currently face barriers in accessing the Park's rich landscapes and attractions.	Comment noted but already covered under para 4.30 where it states "However new development provides opportunities to make improvements to the Park; for example by enhancing and creating new entrance points along its boundaries"	No change
P LA6.4	Enfield	SP	B4	5.8	Policy B4 is particularly significant as it specifies the use of Natural Capital Accounting within the policy as a method of assessing the quality of open land in financial terms. This means that any proposals falling within the LVRPA boundary that would result in the loss or reconfiguration of any open land would need to make use of Natural Capital Accounting methods as part of any planning applications, demonstrating that any land lost would be replaced of equal or greater financial value. This approach is in line with the emerging approach Draft London Plan and it would be interesting to see how in practice this policy is applied, particularly given the LVRP is either designated green belt of Metropolitan Open Land.	Comments noted. As is the case with all public agencies the Authority is feeling its way with the concept of natural capital accounting. Implementation requires further discussion with stakeholders and the riparian planning authorities given this reflects a new approach of understanding the intrinsic value of the natural environment. Policies have been reorganised to separate natural capital (which is wider than just biodiversity) from reference to net gain in biodiversity please refer to E1 and B4 which is renumbered as B2	Revise Policy E1 and B4 as follows: "E1 Work with landowners and key stakeholders across the Regional Park to ensure a) the most effective use of land and property in fulfilment of its statutory purpose; and b) that development proposals take into consideration the Natural Capital Accounting Framework." "B2 Proposals that could result in a net loss of biodiversity will be resisted. Where necessary the Authority will seek planning obligations to deliver the 'mitigation hierarchy' of avoidance, mitigation and compensation." Ensure development proposals within the Park achieve a net gain in natural capital, including net gains in biodiversity.
P LA6.5	Enfield	SP	B4	5.8 4.36	Policy B4 also makes mention of 'net gains in Biodiversity' which alludes to the use of some form of biodiversity offsetting metric. The Mayor of London has proposed to formulate such an approach for London but this as yet is still forthcoming. A biodiversity off-setting metric has been used in some Thameslink projects and may be more appropriate in relation to the CR2 project. The Council would welcome some further clarity on this point and the use of a biodiversity off-setting metric.	It is understood that there are several different biodiversity offsetting metrics in operation by different bodies which cut across the Regional Park. It will be necessary to select the appropriate measure in each case. However policy has been modified to reflect the overarching DEFRA metric endorsed by NE and new policy B1 is now also relevant	Please refer to amendments above and new policy B1 as follows: B1 Development within the Regional Park should be consistent with the Authority's Biodiversity Action Plan and in accordance with a locally approved or DEFRA endorsed biodiversity assessment metric. Protect and enhance the Park's statutorily designated nature conservation sites.
LA5.6	Enfield				Enfield's New Local Plan Enfield Council is currently working towards publication and consultation of its Regulation 18 - Draft New Local Plan and this as an opportunity where both the Council and the Lee Valley Regional Park Authority can benefit from closer collaborative working and understanding.	Comments noted, the Authority welcomes a continuation of collaborative working with L.B. Enfield	No change
P LA7.0	Hackney	SP			Thank you for the opportunity to comment on the proposed strategic policies in the Lee Valley Regional Park Plan. We are broadly supportive of the strategic context, key challenges, opportunities, vision, strategic planning and policy as identified in the Plan. We have set out below a number of observations some of which will assist you when reviewing the Area Proposals for the Hackney area.	Comments noted	No change
P LA7.1	Hackney	SP		2.49 - 2.50	<u>General.</u> There should be reference to the Mayor's ambition for London to be assigned a National Park City as outlined in paragraph 1.2.6 of the draft London plan which the Lee Valley Regional Park will be a vital component.	The Mayor's ambition to make London a National Park city is significant in relation to the Park and is referenced under para 2.50 second bullet point.	No change
P LA7.2	Hackney	SP		4.27 - 4.32	<u>Key Challenges and Opportunities</u> Hackney's emerging Local Plan 2033 identifies brownfield land in the Lee Valley Edge corridor as an opportunity area for housing led development with improvement access to the Park. Hackney's boroughwide characterisation study (2018) identifies opportunities where development can respond to the natural environment setting and improve quality facilities and accessibility into and through the park. This will increase the attractiveness and accessibility of the park to the communities nearby and from further afield.	Comments noted and welcomed	No change

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

P LA8.3	Tower Hamlets	SP HRA		2.47	With regard to housing numbers proposed and quoted, it is imperative that these are accurately provided. Page 14 of the Lee Valley Regional Park Strategic Planning Evidence and Policies (February 2018) gives information on the Mayor's housing zones and makes a reference to 3923 homes at the Poplar Riverside in Tower Hamlets. Whilst this section states that "the programme is also expected to provide 150,000 associated jobs over the next ten years", no timeframe is given for the mentioned housing target. In addition to this, page 40 of the HRA of the Park Development Framework: Update of Strategic Policies (March 2018) states that Regulation 19 consultation of Tower Hamlets Local Plan 2031 indicates an annual housing target (approximate) of 3,100 homes. The Council would like to confirm the source of these housing numbers and request clarity of their scope, i.e. do they refer to the borough or areas of the borough? Regardless, they are a cause for confusion. Regulation 19 of the Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits sets out a minimum requirement of 3,931 homes per annum (adopted London Plan, 2016). It does not refer to the draft London Plan's target.	Comments noted, housing figures will be corrected. Reference to the London Borough of Tower Hamlets Housing Delivery Strategy Sept 2017 states that the Poplar Riverside achieved Housing Zone status in 2015 at which time a projected delivery of over 9,000 homes over a 15 year period was listed, although actual numbers could be higher. This figure will be used and referenced. Likewise the HRA report will be amended as suggested.	Amend figures given in the draft Strategic Policies document at page 14 paragraph 2.47 Poplar Riverside: change '3923 homes' to read 9,000 homes with a footnote referencing the London Borough of Tower Hamlets Housing Delivery Strategy Sept 2017 as source material. Amend the HRA report to correct the homes per annum figure used in Table 5.3 to 3,931
P LA8.4	Tower Hamlets	SP	E1	5.5	Policy E1 seeks to make effective use & management of land by working with landowners across the Regional Park in fulfilling its statutory purposes. This policy is very generic and given the pressure faced by LVPA & the development pressure in the land adjacent to the park, there is a danger that land could be developed for uses that may not actually be in the interest of the Park or its users. This section therefore needs further work & requires clarity on 'effective use & management of land' to ensure that the land is developed for park compatible uses. The Park Plan in 2000 identifies some of the challenges (pg. 11) "Since the Regional Park was established, the area of land in non-Park compatible uses such as commerce, industry and residential has increased. The opportunity to bring land into park related use in the future has been 'lost' through adverse developments (mostly housing).	Comments noted	See below
P LA8.5	Tower Hamlets	SP	E1	5.5	<i>Continued</i> ...Significant losses have also occurred through road construction. The development of the M25 and the North/South Route as well as more minor schemes has left residual sites or isolated sites which no longer contribute to the purposes of the Park". It appears that effective use & management of land is a very general definition in the policy and should be strengthened appropriately. Furthermore, the policy should acknowledge that there might be other stakeholders within the Regional Park, not solely landowners.	Comments noted. The term 'key stakeholders' will be added to policy E1. Note also other amendments to E1 in response to other stakeholder comments.	Amend Policy E1 Work with landowners and key stakeholders across the Regional Park to ensure: a) the most effective use of land and property in fulfilment of its statutory purpose; and b) that development proposals take into consideration the Natural Capital Accounting Framework.
P LA8.6	Tower Hamlets	SP	L1 - L7	5.6	Landscape character, key views and openness The Council supports policies L1 to L7 which seek to conserve and enhance the Parks Landscape character, key views and openness.	Support welcome, policies under landscape have been amended to avoid duplication.	No Change in response to this comment, although Landscape policies have been rationalised. Refer to main document.
P LA8.7	Tower Hamlets	SP		5.7	Cultural heritage and historic environment Whilst the Council supports the intention to conserve and enhance the cultural heritage of the Park, including its archaeology, historic buildings and structures and their settings, it should be noted that majority of the LVRP within Tower Hamlets is situated within conservation areas and the Council would welcome their acknowledgement in policies.	Comments noted. Reference to Conservation Areas will be added under Para 3.22. However the Policy H1 with amendments is considered sufficient to cover all aspect of heritage. The Authority has little control in respect of Conservation Areas.	Add the following text to paragraph 3.22 after the first sentence: "The Park contains a wealth of historic buildings reflecting the various phases of its long history of human settlement, many of which are designated Conservation Areas." Note amendments to Policy H1 see response OA11.8 below.

P LA8.8	Tower Hamlets	SP	B6	4.34 - 4.36	Biodiversity. Whilst the Council supports policies that seek to protect and enhance the biodiversity of the Park, policy B6 - 'secure compensatory measure for adverse biodiversity impacts which cannot be mitigated', secured by planning obligations and undertakings and agreements under section 27 of the Lee Valley Regional Park Act 1966' leaves room for dilution of the aim of this policy. This policy should seek to resist schemes that have an adverse biodiversity impact on the Park. In the absence of this, developments within and in the setting of the Park could over time result in adverse impact on the Park. The Council considers that information on biodiversity is an accurate, if very brief, high-level summary of the park's importance for biodiversity and access to nature. Paragraphs 4.34-4.36 in the Strategic Policies and Evidence document are a good summary of the relevant challenges and opportunities relating to biodiversity. The Council considers policies to be sufficiently robust when conserving and enhancing the park's biodiversity.	Comments noted. The section on biodiversity has been revised so there is a hierarchy of action and to take account of the NPPF. B6 has been deleted. Please refer to the revised B1 and B2 which cover the points raised.	Delete Policy B6. Amend Policy B1 and B2 as follows: B1 Development within the Regional Park should be consistent with the Authority's Biodiversity Action Plan and in accordance with a locally approved or DEFRA endorsed biodiversity assessment metric. Protect and enhance the Park's statutorily designated nature conservation sites- B2 Proposals that could result in a net loss of biodiversity will be resisted. Where necessary the Authority will seek planning obligations to deliver the 'mitigation hierarchy' of avoidance, mitigation and compensation. Ensure development proposals within the Park achieve a net gain in natural capital, including net gains in biodiversity.
P LA8.9	Tower Hamlets	SP	L3 D2		The references to the Park's semi-natural character in L3 and protected ecological and heritage assets in D2 are welcomed.	Support welcome	No Change
P LA8.10	Tower Hamlets	SP		3.31	Paragraph 3.31 concentrates on habitats and sites. It might be worth adding something about species, as the park support rare species and internationally important populations of species. Likewise, in Table 3.1 on ecosystem services, there should be a mention of rare and important populations of species under "Supports biodiversity". Otherwise, this table seems comprehensive.	Agreed additional wording will be added to cover this point. This will also be added to Table 3.1 under the heading 'Supports Biodiversity'	Amend paragraph 3.31 as follows and add text in red to Table 3.1: "The Park contains a diverse range of high quality habitats including rivers and streams, standing open water, floodplain grassland and fen, wet woodland, and urban post-industrial habitats. These habitats support a range of species of which individuals and their assemblages range in status from local to international importance. Eight sites in the Park are designated Sites of Special Scientific Interest (SSSI), including Amwell, Rye Meads, Turnford and Cheshunt Pits, Walthamstow Reservoirs, Waltham Abbey Woods, Cornmill Stream and Older River Lea, Chingford Reservoirs, and Walthamstow Marshes. The first four of these together form the Lee Valley Special Protection Area (SPA) and Ramsar site.
P LA8.11	Tower Hamlets	SP	W1 W2	5.9	<u>Water space</u> Policies W1 and W2 that seek to protect biodiversity and recreational offer, and support recreational use of water spaces. Tower Hamlets' New Local Plan requires no loss or covering of water spaces unless developments include water-related or water-dependent uses. Whilst policy W2 supports developments that encourage recreational uses, the Council would welcome the greater protection of the water spaces from other incompatible uses.	Comments noted and the issue understood but in terms of the Regional Park's planning role W2 is considered sufficient.	No change
P LA8.12	Tower Hamlets	SP	V2 - V4	5.1	<u>Parkland and venues</u> The Council supports policies V2-V4 which seeks to develop sporting uses and provide appropriate visitor/education facilities.	Support welcome	No Change
P LA8.13	Tower Hamlets	SP	V1	5.1	However, policy V1 resists the development of non-Park related uses unless they can make a significant contribution to the Authority's statutory purposes. The policy is not clear about what it seeks to achieve and raises concerns as to how this will be interpreted. The Park was proposed in 1966 in response to an increasing scarcity of land for leisure and recreational uses. The aim was to link the area with derelict land in the city with existing open spaces to form a green corridor (The Park Plan 2000 pg. 5). Unless the policies resist non-Park uses, there is a danger that the delivery of green corridor will be compromised, particularly in dense urban areas.	Comment and concerns noted.	No Change

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P LA8.14	Tower Hamlets	SP	D3	5.11	<u>Major Developments</u> . Whilst the policies in general are supported, policy D3 is unclear. Policy D3 supports development that is consistent with other strategic policies particularly leisure, recreation and sports. Policy D3 could provide clear direction by expressly stating that it would support the development of Park – compatible use that is consistent with other strategic priorities to ensure that the primary purpose of the Park is not compromised over time.	Comments noted and it is agreed that D3 is unclear. It will be deleted	Delete Policy D3 Support development that is consistent with other strategic policies, particularly recreational, leisure and sporting facilities.
P LA8.15	Tower Hamlets	SP	A1 - A5		<u>Accessibility</u> The Council supports policies A1-A5 which seeks to improve accessibility and movement, and promote way finding within the Park.	Comments and support welcomed.	No Change
P LA8.16	Tower Hamlets	SP		5.1	<u>Health and wellbeing</u> Whilst the document and policies reference elements of health improvement such as active travel, leisure and recreation but not to any detail, the Council considers that the policies do not acknowledge the importance of promoting individual and community health and well-being. The documents refer to numerous policies / strategies that influence healthy living concerning stress, air quality as well as living space to support community cohesion but there is definitely scope to strengthen this area.	Agreed. Additional text has been incorporated into the strategic planning aim under 5.10 to cover this point.	Amend the following strategic planning aim as follows: "Increase the attractiveness and use of the parklands and venues to support the health and wellbeing of visitors from all communities "
P LA8.17	Tower Hamlets	EvB		para 6.16 - 6.20	<u>Design and heritage</u> Lee Valley Regional Park evidence base fails to recognise the presence of the sections located in Tower Hamlets. Admittedly our sections are not significant in terms of size, but since they are designated elements of the Regional Park, we need to be a part of the evidence as any other area.	Comments noted see below for further detail.	See below
P LA8.18	Tower Hamlets	EvB		6.6 - 6.13	The evidence base does not recognise landscape character of the Park's sections located within London Borough of Tower Hamlets. Further work is required to assess landscape quality and propose strategy directions. Admittedly all sections of the LVRP run through urban areas and are likely to be limited to the extent of water space. We need to understand the extent and methodology behind the classification of character and landscape strategy directions. All sections require closer look and understanding of exact boundaries in order to suggest any specific direction of the strategy.	Comments noted and agreed, section 6 of the Evidence Base will be updated to reflect details in the new landscape character assessment and guidelines. This will cover the landscape character of Park areas within Tower Hamlets	Section 6 paras 6.6 to 6.13 of the Evidence Base will be updated to reflect the new landscape character assessment and strategy guidelines; this will recognise the landscape character of the Park within Tower Hamlets.
P LA8.19	Tower Hamlets	EvB		6.16 - 6.20	Whilst all heritage assets in the vicinity of the park are mapped, the text on page 44-45 fails to list them. In case of Tower Hamlets LVRP a. Contains majority of Limehouse Cut CA and a small section of Regent's Canal CA b. Cuts through: Victoria Park CA, St Anne's Church CA, Three Mills CA, c. Is adjacent to Narrow Street CA, Fish Island and White Post Lane CA The text should also reflect on this and on key statutory listed buildings within or directly adjacent to the park. Map 6.4 appears busy and contains plethora of information irrelevant to the LVRP.	Comments noted, Map 6.4 provides a visual summary of how complex the heritage assets are within and surrounding the Park. Further detail is available from the relevant local authorities; boroughs and districts. Text will be amended to add further examples from the south of the Park as suggested.	Amendment needed to para 6.18 of the Evidence Base as follows: "The Park contains a high number of historic buildings and structures, many of which also form part of are designated conservation areas and are a major focus for visitors . These include, For example ; the scheduled ancient monument of Rye House Gatehouse, Myddelton House and Gardens, and the Waltham Abbey Gardens, both of which are a major focus for visitors. and in the south the complex of buildings and features within the Three Mills Conservation Area and the Limehouse Cut Conservation Area. Many other Conservation Areas lie adjacent to the Park, such as the Fish Island and White Post Lane Conservation Area.

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P LA8.20	Tower Hamlets	EvB		4.1	<p><u>Biodiversity</u> Paragraph 4.10 lists Greek Dock among a short list of species found in "interesting communities of plants on urban wasteland". Whilst the Council supports the inclusion of urban wasteland and its interesting plant communities in this section and agree that non-native species form a significant part of the interest of this habitat, Greek Dock is potentially a highly invasive species and it should not be interpreted as a positive feature. The Council recommends removing Greek Dock from the list.</p>	Comments noted and agreed. Greek Dock will be removed from the list.	Remove Greek Dock from the list at paragraph 4.10 of the Evidence Base
P LA8.21	Tower Hamlets	EvB		4.41	<p>Paragraph 4.41 is a little out of date as there is little or no saltmarsh vegetation left at East India Dock Basin, and Common Terns have not nested for the last two years, and don't appear to be doing so this year.</p>	Comments noted. A survey in 2013 showed the presence of some saltmarsh. Text has been amended to better reflect the current situation.	Amend paragraph 4.41 as follows: "East India Dock contains tidal brackish water and there are mudflats with a small band of saltmarsh vegetation to the north. A colony of Common Tern return to the valley each year and have bred on the s here to breed every summer on the artificial rafts. Species recorded here include Black Redstart, Shelduck and flocks of wintering Teal."
P LA8.22	Tower Hamlets	EvB			<p>Figure 4.1 does not appear to show SINC's correctly. East India Dock Basin is a SINC and it is not shown as such on this map. The Council questions whether the information on the map is from before the 2011 review which indicates it is out of date.</p>	Agreed Fig 4.1 will be amended to show correct designation	Amend Fig 4.1 to show SINC's correctly.
P LA8.23	Tower Hamlets	EvB			<p><u>Health and wellbeing</u> The Council is supportive of the representation of the importance of health and wellbeing throughout the document. The council supports the acknowledgement of the benefits of open space to health and wellbeing, but it should also be considered how the LVRPA can attract a greater proportion of residents from more socially deprived backgrounds (social grade d/e semi-skilled, unskilled, unemployed etc.), which represent a greater number of their local residents, who are not accessing the part as much as they wish to. It should be noted that Primary Care Trusts haven't existed for over five years, as referenced in paragraph 5.23. As such, these should be omitted or the wording should be amended to reference Clinical Commissioning Groups which have replaced the PCTs.</p>	Comments noted, please refer to the response above under LA8.16 regarding Health & Well being. Text will also be amended to use the correct terminology 'Clinical Commissioning Groups' as suggested.	Amend Evidence Base text at 5.3 to change PCT reference to Clinical Commissioning Groups, and check for any other occurrences and amend.
P OA9.0	Canal & River Trust	SP		4.45	<p>The Canal & River Trust (the Trust) is the guardian of 2,000 miles of historic waterways across England and Wales, of which approximately 100 miles are within our London Waterway. We are among the largest charities in the UK. Our vision is that "living waterways transform places and enrich lives". Our waterways, including the adjacent towpaths, provide important areas for recreation, biodiversity, sustainable transport (with a related air quality benefit), business, tourism, a focal point for cultural activities and, increasingly, a space where Londoners are choosing to live. They can also provide a resource that can be used to heat and cool buildings, a corridor in which new utilities infrastructure can be installed and a way of sustainably draining surface water away from new developments. We believe that supportive policies and investment that lead to the development of thriving waterways and waterside places are part of a virtuous cycle that can increase wellbeing by improving physical and mental health, bringing communities together and encouraging economic development.</p>	Comments noted	No change

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P OA9.1	Canal & River Trust	SP & EvB		4.45	The Trust's waterways form a key part of the Lee Valley Regional Park. We agree that the park is an important asset for promoting health and wellbeing (para 4.45 of your strategic policies document) and we look forward to continuing to work with the Authority to deliver many of the strategic policies set out in the draft Park Plan document. We suggest that the Trust should be identified as a key stakeholder in the plan generally and any proposals related to the Lee Valley Walk, on-water uses, heritage or biodiversity of the waterway corridor.	Comments noted. The Trust is identified in the Area Proposals in relation to relevant proposals and projects. Additional text will be added in the Evidence Base and Policies documents to identify the role of the Canal & River Trust within the Park	Add text to Evidence Base, end of paragraph 2.35 as follows; " The Canal & River Trust is responsible for the Lee Navigation including the adjacent towpath and is a key stakeholder in relation to the waterway corridor, its heritage, biodiversity, visitor and general recreational use. The Trust is engaged in a series of improvement plans for the towpath to enhance walking and cycling opportunities. " Add text to para 3.27 in the Policy document as follows: "The Park is also used extensively for informal recreation, particularly walking and cycling and also recreational boating, including cruising along both the Lee and Stort Navigations. "
P OA9.2	Canal & River Trust	SP			<u>The Trust's Improvement Plans.</u> We are putting together proposals for improvements to the towpath along the Lee Navigation for walking and cycling and have been discussing these with TfL and the London Boroughs. We would like to meet with LVRPA to discuss these. Potential interventions include: <ul style="list-style-type: none"> • Improving under bridge environments • Smoothing cobbles • Upgrading access points • Removing barriers • Upgrading the towpath where necessary • Improving wayfinding and links to other paths/points of interest/connections. Whilst our main focus has been on the length of towpath within Greater London (the GLA area), we hope to secure improvements to the towpath between Ratty's Lane and Rye House if the Hoddesdon Energy from Waste Plant (which we have objected to on visual impact grounds) is permitted by the Secretary of State	Comments noted and improvement plans welcomed. A meeting will be arranged.	No change
P OA9.3	Canal & River Trust	SP			In addition, we: <ul style="list-style-type: none"> • have submitted a bid to Defra through the Water Environment Grant for soft bank protection along the Lee and Stort around Feildes Weir. If successful, this would support maintaining/improving the Water Framework Directive status of the watercourses. We will find out if we have been successful in September. This follows similar work completed elsewhere in the park in 2017. • are installing canoe portages at Carthagena and Waltham Locks. This would help to promote Carthagena as an area for waterside recreation, consistent with the area proposals of the park plan. These are due for delivery this year. • are working in partnership with Herts and Middlesex Wildlife Trust on a catchment-based approach to invasive species along the Lee. 	Improvement projects noted and welcomed. Additional canoe portages will hopefully tie in with the PDF Proposal to establish a canoe trail through the Park.	No change
P OA9.4	Canal & River Trust	SP		3.34	<u>Promoting Walking and Cycling.</u> We support much of what is contained in the strategic policies document on walking, cycling and accessibility, including the section on 'accessibility and way marking', which is consistent with the Trust's plans. However, we suggest that there should be greater recognition of use of the park for utility trips and the potential for the park to form part of people's active travel journeys in their everyday lives (on pages 20-22 for example). The proximity of railway lines makes this feasible and the potential to have an impact on people's wellbeing by promoting these links should be explored further.	Comments noted, however the term or concept of utility trips is not a concept or term that the Authority seeks to promote in relation to the Park. Routes within the Park are designed primarily for leisure and sporting use	No change

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P OA9.5	Canal & River Trust	SP			<p><u>Mooring within the Park</u> The Trust is very disappointed to note that whilst the LVRPA appear to increasingly believe that residential development on land within the park may be an appropriate means of securing wider improvements consistent with its statutory functions (see the proposal for the Broxbourne Leisure Pool Development Brief, for example), this does not extend to on-water uses. We believe that there are clear benefits to meeting a proportion of the increased demand for residential moorings through the provision of appropriate managed sites. This would enable the provision of services (such as bins, pump out facilities, power and water points etc) that are better able to cope with the demands that residential boaters place upon them. It would also, for example, enable a better means of managing the storage of residential paraphernalia than is sometimes seen on towpath or less formal non-towpath moorings.</p>	<p>Comments noted. Proposals for residential development on Authority owned land could release capital for investment in the Regional Park. Proposals for residential moorings (as opposed to recreational or visitor moorings) advocated by the Canal & River Trust are as yet untried and untested in this respect.</p>	No change
P OA9.6	Canal & River Trust	SP			<p>Over recent years, we have engaged with senior officers at LVRPA as part of our preparation of a London Mooring Strategy; published for consultation between Oct 2017 & Jan 2018. It explained the challenges that the Trust (& other stakeholders) face in responding to the rapid growth in the number of boats on & accessing our London waterways. In summary, betw 2010 - 2017 the number of boats sighted on the Trust's London waterways has grown from 2101 to 4001. The largest proportion of boats are in E. London (Limehouse Cut, Hertford Union Canal, Lee Navigation & River Stort). E. London has also seen the fastest growth. In recent surveys apprx 50% of boaters told us that they use their boats as permanent homes. There are areas of the park where presence of moored boats & boating communities are an indisputable part of the local character. Our draft strategy proposed that a mooring policy should be agreed between our 2 organisations & drafts of this were made available by Trust staff for discussions at meetings during our engagement with you. Whilst no agreement could be reached, the issue still exists & it does not alter our belief that the provision of more permanent, managed moorings would have a net beneficial impact on the park and its ability to deliver its statutory functions. Other proposals in the Mooring Strategy are also relevant to your plan.</p>	<p>Officers did engage with the Canal & River Trust on work to inform a London Mooring Strategy and a report on the consultation version of the draft strategy was considered by the Authority's Executive Committee (Dec 2017 E/534/17). The Authority's response acknowledged the importance of developing a mooring strategy and a need for a tailored approach within the Park given its role for leisure and recreation. The Strategy also needed to address the important role the waterways play in supporting biodiversity and how this should be protected and enhanced. Further detail was requested and is awaited in relation to the Regional Park and on the priorities and resources needed to address the issues identified.</p>	No change
P OA9.7	Canal & River Trust	SP			<p>Given the engagement that we have undertaken and the timing of the publication of the draft London Mooring Strategy, we are curious as to why the Strategic Policies consultation document makes no reference to a significant change to how the waterways of the park are used. We suggest that the failure to address this issue at all (if only to justify the approach proposed) undermines either the contribution that our waterways make to the park (which we suggest would be erroneous) or the draft plan itself.</p>	<p>As above</p>	No change

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P OA9.8	Canal & River Trust	SP			In the context of the LVRPA's changing approach to residential development on certain parcels of land, we consider that it is not appropriate for statements such as "the development of linear residential moorings to be avoided" to be included within the character area proposals of a document that is intended to have weight in the planning process without a proper consideration of the policy and legislative issues. We would suggest that part of this consideration should be the changing legislative context, where, under section 124 of the Housing and Planning Act 2016, local authorities (as housing authorities) have an obligation to assess the needs of boaters residing in or resorting to their district. Draft government guidance suggests that the planning process should then be used to provide or facilitate provision. In the absence of any proper consideration of the impacts of the plan's approach to moorings in the park (and alternative policy positions), it is not possible to determine whether it is justified for support to be given to support for residential development on some areas of land but not others (including water).	Comments Noted, these also refer to the draft Proposals. The Park Authority is not a planning authority - housing needs are a matter for the local planning authorities to consider and assess. Policy in the PDF seeks to balance competing needs on the waterways in relation to the Park's remit, from leisure users, visitors, sporting interests and wildlife. As stated above proposals for residential development on Authority owned land could release capital for investment in the Regional Park. Proposals for residential moorings advocated by the Canal & River Trust are as yet untried and untested in this respect.	No change
P OA9.9	Canal & River Trust	SP			Operational Challenges The Trust has a number of operational challenges within the Lee Valley Regional Park. We would welcome a meeting with you to discuss how we may be able to address these in a joined-up, efficient manner. Issues include: <ul style="list-style-type: none"> • Hot spots of rough sleeping and anti-social behaviour. • Areas that lack appropriate facilities, including towpath bins. • Signage • Collection of and disposal of aquatic weed and litter. • Suitable wharfage for the Trust's operational boats. • Management of vegetation, including invasive species such as Giant Hogweed that straddles our boundary. We believe that tackling these issues will lead to greater enjoyment of the park by visitors.	Comments noted and discussion on these matters would be welcome although these are all long standing issues.	No change
P OA10.0	Environment Agency	SP			Thank you for consulting us on the emerging Park Development Framework documents specifically the draft strategic planning policies and the draft amended proposals for Areas 6, 7 and 8. Our aim is to create better places for people and wildlife, and we welcome the opportunity to comment on the emerging plans. Our comments are as follows:	Comments noted	No change
P OA10.1	Environment Agency	SP		4.41 - 4.44	Section 4 – Key Challenges and Opportunities. We think this section has identified two main pressures and challenges regarding water resources and water quality. However, in regards to water quality, it could do with extending the pressures on water quality and resource to beyond over abstraction and effluent discharge. The challenges recognised should also extend to diffuse source pollution from urban runoff, pollution incidents, industrial discharges and other point source pollution such as drainage misconnections. These challenges are more likely to come from the surrounding areas of the park. Including these challenges will also place emphasis on the wider range of stakeholders and partners that need to play their part to improve the water environment, not solely the water companies.	Comments noted, text under 4.41-4.44 will be amended to add the pollution challenges identified.	Amend text at paragraph 4.44 and add a final sentence as follows: "Other challenges, likely to come from areas surrounding the Park include diffuse source pollution from urban runoff, pollution incidents, industrial discharges and other point source pollution such as drainage misconnections" .

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P OA10.2	Environment Agency	SP		4.41 - 4.44	In our response to the Strategic Environmental Assessment scoping report dated October 2017, we also highlighted the current status of the waterbodies within the park, as follows: The following waterbodies will have been classified in terms of their current ecological status or potential: - Lee Navigation (Enfield Lock to Tottenham Locks) GB106038027950 (2016 status: bad). - Lea Navigation (Fieldes Weir to Enfield lock) GB106038077851 (2016 status: poor). - Small River lee (and tributaries) GB106038033200 (2016 status: moderate).	Comments noted; the status of the waterways as described is set out within the revised Evidence Base which underpins the SEA report, please refer to Table 7.1 Ecological Status of water bodies within LVRPA, page 52. Para 2.56 of SEA refers to this evidence.	No change
P OA10.3	Environment Agency	SP		4.41 - 4.44	We also raised the issue of boat movement in the park and its potential to contribute to poor water quality through sediment disturbance from boat wash and discharges of effluent into the watercourses. A number of Water Framework Directive action measures are identified for the Lee Navigation are linked to boat movement and increasing awareness of the impacts on water quality. We recommend you review our response to the SEA scoping and ensure the issues raised are adequately reflected in this section.	Water quality issues related to boat movements are covered under para 7.19 in the Evidence Base. Paragraph 2.57 of the SEA identifies the Authority's role in relation to this matter. Policy W1 and new Policy W3 are also relevant and cover this matter, given the Authority's ability to influence what happens.	No change but see new policy W3 as discussed under EA 10.10 below
P OA10.4	Environment Agency	SP		4.41 - 4.44	We think it would be beneficial to state that these pressures for the water environment create challenges for us to help the waterbodies achieve "Good Ecological Status" which is an objective of the Thames River Basin Management Plan (2015).	Agreed, add sentence as suggested to highlight the challenges faced in achieving "Good Ecological Status"	Amend paragraph 4.44 by including an additional sentence in addition to that added in response to OA10.1 above, as follows: "These pressures for the water environment combine to create challenges for the EA and other stakeholders in seeking to achieve Good Ecological Status for the waterbodies in accordance with the Thames River Basin Management Plan (2015)"
P OA10.5	Environment Agency	SP		5.1 - 5.3	Section 5 – Vision, Aims and Strategic Policies. <u>Flood Risk</u> Although flood risk, flood mitigation and climate change are identified as key challenges in Section 4, this has not followed through into the strategic aims and policies in Section 5. The Spatial Portrait in Section 3 recognises the park's role in protecting London and the surrounding areas from flooding. The park largely consists of the River Lee's natural floodplain, and as such much of the land is classified as Flood Zones 2 and 3, defined by the National Planning Policy Framework as having a medium and high probability of fluvial flooding, respectively. The Lee Flood Relief Channel is also a vital piece of infrastructure within the park in alleviating the risk of flooding. It's important that the function of the Lee Flood Relief Channel and associated reservoirs is protected by future activities and development.	Comments noted, please see below for response	Amend policy text under section 5.3 - policy 5.9 see below
P OA10.6	Environment Agency	SP		5.1 - 5.3	Likewise, the Strategic Environmental Assessment Objective 12 "To reduce the risk of flooding to people and promote the sustainable management of flood risk" is not adequately promoted in the aims and policies.	Comments noted, please see below for response	Amend policy text under section 5.3 - policy 5.9 see below

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P OA10.7	Environment Agency	SP		5.3	We recommend that an additional strategic planning aim is included in 5.3 as follows: - <i>Protect and enhance the park's function in reducing and managing flood risk.</i> The policy criteria under this aim could include the following: - Work with the Environment Agency and others to protect the function of the Lee Flood Relief Channel - Enhance the park's function in mitigating and reducing flood risk to the surrounding areas, by natural flood management and sustainable drainage measures - Increase the ability of the park and surrounding areas to adapt to climate change and its impact on flood risk by promoting green infrastructure.	Agreed a new policy aim and set of criteria will be included as suggested to cover flood risk and management although with a slight amendment to the suggested wording.	Amend policy text to include an additional strategic planning aim under 5.3 as follows: - Protect and enhance the Park's contribution to reducing and managing flood risk. Add a new set of policy criteria 5.13 under this policy aim as follows: 5.13 The Park Authority will: - Work with the Environment Agency and others to protect the function of the Lee Flood Relief Channel - Enhance the Park's contribution to mitigating and reducing flood risk to the surrounding areas, by natural flood management and sustainable drainage measures - Increase the ability of the Park and surrounding areas to adapt to climate change and its impact on flood risk by promoting green infrastructure.
P OA10.8	Environment Agency	SP	W1 and W2		The alternative to the above is to adapt strategic aim "Protect and make the best use of the park's water spaces" with additional policy criteria under 5.9, to include 'flood risk' recognising the park's key role in flood storage and flood risk management. The above recommendation will help to ensure that the park's function as a flood risk asset is not compromised in achieving other objectives.	Please see response to P OA10.7 above	Please see response to P OA10.7 above
P OA10.9	Environment Agency	SP		5.3	<u>Water quality and resources</u> Regulation 17 of the Water Framework Directive (England and Wales) Regulations 2003 places a duty on each public body, including Local Authorities, to 'have regard to' River Basin Management Plans when exercising their functions. Based on our comments in relation to Section 4 and the SEA scoping, we recommend the following strategic aim is amended as follows: "Protect, <u>improve</u> and make the best use of the Park's water spaces"	Comments noted and agreed. The strategic policy aim relating to the Park's water spaces will be amended as suggested.	Amend policy aim text under 5.3 as follows: Protect, improve and make the best use of the Park's water spaces.
P OA10.10	Environment Agency	SP		5.9	We recommend the policy criteria in 5.9 should include the following: W3: Ensure that existing water bodies are protected and enhanced supporting the objectives of the Thames River Basin Management Plan.	Comments noted. The Authority is a partner in the River Basin Management planning process - its main contribution is through habitat restoration and enhancement works and to a lesser extent in responding to planning proposals that might impact the water environment and its quality. An addition to the Water policies will be included as suggested.	Add the following as a third policy under 5.9 W3: Ensure that existing water bodies are protected and enhanced compliant with the objectives of the Thames River Basin Management Plan.
P OA10.11	Environment Agency	SP	D2	5.11	We recommend a similar policy criteria to D2 of policy 5.11 is added (for clarify and consistency) as follows: D2: Work in partnership with riparian councils to ensure that the nature of new development on sites both within and adjacent to its boundary enhances the Regional Park in line with its draft strategic policies and protects and enhances water bodies whilst reducing flood risk.	This is unnecessary given new W3 and new policies on reducing and managing flood risk - see above	No change
P OA11.0	Historic England	SP		2.3	We welcome the section on the historic environment but note a typographical error at the start of bullet point 3 (should read 'the')	Noted, text will be amended	Minor amendment first word bullet 3 para 2.30 should read 'The'
P OA11.1	Historic England	SP		2.40-41	We welcome reference to the Strategic Cultural Area.	Comments welcomed but unfortunately this is no longer recognised in the draft London Plan and the paragraph will need to be deleted.	Delete paragraphs 2.40 and 2.41
P OA11.2	Historic England	SP		3.6	We welcome the updating of the Draft Landscape Character Assessment.	Noted	

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P OA11.3	Historic England	SP		3.15 - 3.22	We broadly welcome this section entitled, Revealing History. However, we suggest that specific reference is made to some of the many listed buildings, conservation areas, scheduled monuments in and immediately around the Park. We also suggest mention is made of any assets currently on the Heritage at Risk Register including Scheduled Monument and Conservation Area at the Royal Gunpowder Factory and Waltham Abbey.	Comments noted. Paragraphs 3.15 to 3.22 provide a good and detailed overview of the Park's heritage backed up by the Evidence Base which also seeks to map under Fig 6.4 the key features, such as listed buildings, registered parks and gardens and conservation areas etc. See also comments below at OA 11.7	No change
P OA11.4	Historic England	SP		3.29	We welcome the connection made between green infrastructure and the conservation, enhancement and interpretation of the setting of the Parks historic assets. However, we would normally refer to these as 'heritage assets' rather than 'historic assets'. Please amend this reference throughout the Plan.	Comments noted. Text will be amended	Amend text throughout to ensure 'historic assets' is replaced with ' heritage assets'.
P OA11.5	Historic England	SP		Table 3.1	We welcome the reference in Table 3.1 to the appreciation of heritage.	Comments noted	No change
P OA11.6	Historic England	SP		4.3	we are concerned at the reference to 'replacing old structures with new and well-designed buildings.' This could be mis-interpreted. The NPPF emphasises the importance of the historic environment and states that heritage assets are an irreplaceable resource. Please amend this paragraph to clarify.	Comments noted, the reference to 'replacing old structures with new well designed buildings...' is not directed at heritage assets but the text can be amended to make this clearer.	Amend text under para 4.30 as follows: "...new development provides opportunities to make improvements to the Park; for example by enhancing and creating new entrance points along its boundaries, replacing old structures with new and well-designed buildings , conserving and enhancing historic heritage assets and their settings, as well as revealing significance , replacing old structures with new and well-designed buildings , and incorporating planting and habitats within the development site that complement the Park." Please see further changes made below at P OA11.7
P OA11.7	Historic England	SP		Section 4, para 4.30	Section 4 could also have a section on Conservation and Enhancement of the Historic Environment. The paragraph could discuss the need to seek opportunities to better reveal significance and enhance setting of heritage assets and well as opportunities to address Heritage at Risk. There should also be greater reference to archaeology in the Plan.	Additional text included under 4.30 to pull together the various sections that mention heritage throughout the document.	Amend text under para 4.30 as follows: "...development has the potential to adversely affect the park's natural and heritage historic assets and their wider setting in the Park, particularly given the complexity of the Park's strategic and interconnected network of habitats and the multilayered and diverse heritage resource . "However new development provides opportunities to make improvements to the Park.....[see changes above OA11.6] ..that complement the Park. Development may also provide the opportunities to address Heritage at Risk. "
P OA11.8	Historic England	SP	H1	5.7	Paragraph 5.7 Whilst we broadly welcome this paragraph, H1 could be reworded to read Conserve and enhance the Park's historic environment and cultural heritage including its archaeology, historic buildings and structures, areas and landscapes and their settings.	Comments noted. Agreed that some rewording of H1 would be helpful.	Amend Policy text under H1 as follows: H1: Conserve and enhance the Park's historic environment and cultural heritage including its archaeology, historic buildings, and structures, landscapes and their settings.
P OA11.9	Historic England	SP	D2	5.11	Paragraph 5.11 We welcome the reference to heritage assets but would suggest the addition of the words ' and their settings ' at the end of the sentence.	Comments noted but with the reference to 'settings' in H1 the addition of the same text under D2 is considered unnecessary	No change

P OA12.0	HMWT	SP		5.8	The policies are good in principle but will be more effective if they are more specific around the subject of net gain. For net gain to mean anything tangible it must be measured in an objective, consistent and sanctioned way. The best mechanism currently available for doing this is the DEFRA biodiversity offsetting metric, or DEFRA metric. It has been adapted to be more generic or more specific (<i>attachments provided</i>) depending on the needs of LPAs. This mechanism (or more specifically an agreed calculator derived from the metric as attached or as specifically created and endorsed for the LVP) must be specified as the way by which net gain on habitats is demonstrated, i.e. that only a net positive ecological unit score will be permitted. I would suggest that the policy be adapted as below in red. Several LPAs in Hertfordshire have included reference to the metric in their local plans, including East Herts and Broxbourne. It would be entirely consistent with these documents if the LVP were to do the same. These reference the Environment Bank version as their calculator of choice. The current consultation on NPPF and the 25 year vision also refer to measurable net gain in biodiversity, further reinforcing the need for objective, measurable, and consistent evaluation, not the subjective situation we have now.	Comments noted and advice welcomed on this matter. As is the case with all public agencies the Authority is feeling its way with the concept of natural capital accounting and in achieving net gains in biodiversity. Implementation requires further discussion with stakeholders and the riparian planning authorities given this reflects a new approach of understanding the intrinsic value of the natural environment. Policies have been reorganised to separate natural capital under E1 which is wider than just biodiversity. Biodiversity policies have also been revised and B4 redrafted as B2. It is understood that there are several different biodiversity offsetting metrics in operation by different bodies which cut across the Regional Park. It will be necessary to select the appropriate measure in each case. However policy has been modified to reflect the overarching DEFRA metric endorsed by NE as suggested, please refer to therevised B1.	Amend B1 as follows: Development within the Regional Park should be consistent with the Authority's Biodiversity Action Plan and in accordance with a locally approved or DEFRA endorsed biodiversity assessment metric. Protect and enhance the Park's statutorily designated nature conservation sites- Revise Policy B4 as follows: Proposals that could result in a net loss of biodiversity will be resisted. Where necessary the Authority will seek planning obligations to deliver the 'mitigation hierarchy' of avoidance, mitigation and compensation. Ensure development proposals within the Park achieve a net gain in natural capital, including net gains in biodiversity.
P OA12.1	HMWT	SP	B4		Amendments in bold "B4: Ensure development proposals within the Park achieve measurable net gains in biodiversity. Net gain on a habitat level must be determined by using the DEFRA biodiversity metric (as amended, or a locally endorsed biodiversity assessment metric)"	Comments noted please refer to amendments set out above.	Please note amendments above
P OA12.2	HMWT	SP	B6		Amendments in bold "B6: Secure compensatory measures for adverse biodiversity impacts which cannot be mitigated, secured by planning obligations and undertakings and agreements under Section 27 of the Lee Valley Regional Park Act 1966. Work with the Mayor on a suitable approach to biodiversity offsetting, with the park providing 'receptor sites'. The extent, composition and management of offset sites will be determined by reference to the DEFRA biodiversity offsetting metric (as amended, or a locally endorsed biodiversity assessment metric) "	See amendments under Tower Hamlets LA8.8 above. B6 has been deleted and reference to biodiversity metric included within B1 as revised.	Delete Policy B6. Amend Policy B1 and B2 as follows: B1 Development within the Regional Park should be consistent with the Authority's Biodiversity Action Plan and in accordance with a locally approved or DEFRA endorsed biodiversity assessment metric. Protect and enhance the Park's statutorily designated nature conservation sites- B2 Proposals that could result in a net loss of biodiversity will be resisted. Where necessary the Authority will seek planning obligations to deliver the 'mitigation hierarchy' of avoidance, mitigation and compensation. Ensure development proposals within the Park achieve a net gain in natural capital, including net gains in biodiversity.
P OA13.0	Natural England	HRA			Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. In our review of the LVRPA Draft Strategic Planning Policies and HRA, Natural England are of the opinion that the draft policies may have likely significant effect upon the integrity of Lee Valley SPA (legally underpinned by Walthamstow Reservoirs SSSI).	Comments noted see below for further detail.	See below

P OA13.1	Natural England	HRA			<p><u>Habitats Regulations Assessment – Recent ECJ</u> We note that the HRA you have completed is a screening assessment. Natural England would like to take this opportunity to draw your attention to the recent European court judgement Case C-323/17. People Over Wind v Coillte Teoranta (April 2018). The outcome of the legal judgement, is that if avoidance and mitigation is required to remove significant effects from a Natura 2000 site, such as Lee Valley SPA, then it is likely a full Appropriate Assessment will need to be completed. Unfortunately the matters cannot be merely screened out. We understand from reading your assessment avoidance and mitigation measures are part of your methodology. We are in the process of developing an approach to take in relation to this updated case law, associated advice has yet to be determined. I know that both the Planning Inspectorate and DTA Ecology have already published notes on this judgement. However you risk legal challenge if you continue with just a screening. We suggest you take your own legal advice. We attach the judgement for your information.</p>	<p>Comments noted. The Authority has held a meeting with NE under their Discretionary Advice Service to discuss the HRA and the methodology regarding mitigation. A second and updated response has now been received from NE please see below. This recognises the Authority's strong track record in conservation management and that the strategic framework with revised policies promotes the protection and enhancement of designated sites and biodiversity and HRA-compliant projects. NE therefore conclude that an LSE on Lee Valley SPA, as a result of public access associated disturbances caused by the Park Plan: Part 1 Strategic Policies update alone and in-combination, can be objectively ruled out at this stage. However with regard to air pollution the Authority recognises that as a result of air pollution caused by the Park Plan: Part 1 strategic policies in-combination with development plans in riparian and neighbouring authorities, a likely significant effect cannot be objectively ruled out at this stage. The Authority have therefore commissioned an Appropriate Assessment to consider this matter further.</p>	<p>Further policy changes may be required following the outcome of the AA regarding Air Pollution in combination impacts.</p>
P OA13.2	Natural England	HRA			<p><u>Habitats Regulations Assessment</u> We note that the HRA screens out likely significant effects on Lee Valley SPA. However we note a contradiction in the avoidance and mitigation strategies proposed in Policy B5 & B6. They suggest that the policies may cause likely significant effects upon the integrity of Lee Valley SPA. Especially in light of the Precautionary Principle test which sits within the Habitats Regulations.</p>	<p>Comments noted. Biodiversity policies have been redrafted and B5 and B6 deleted as a result of consultee comments. Please refer to revised B2 for policy on the mitigation hierarchy.</p>	<p>Revise policy B2 as follows: Proposals that could result in a net loss of biodiversity will be resisted. Where necessary the Authority will seek planning obligations to deliver the 'mitigation hierarchy' of avoidance, mitigation and compensation. Ensure development proposals within the Park achieve a net gain in natural capital, including net gains in biodiversity.</p>
P OA13.3	Natural England	HRA			<p>Furthermore, screening in Epping Forest SAC on the grounds of Air Quality suggests there is an expectation that more visitors will drive/take public transport to and from Lee Valley SPA, thus requiring to screen in Lee Valley SPA.</p>	<p>Noted the Authority is liaising with EFDC and the Conservators on air quality matters but awaits the outcome of the air quality modeling and transport assessment. This will form part of the AA. Please note new policy D4 that seeks to address issues relevant to the SAC.</p>	<p>New Policy D4: Working with the London Mayor and riparian Boroughs/Districts explore opportunities to designate sites within the Park to allow access to natural green space designed to offset adverse impacts of new development on the Epping Forest SAC.</p>
P OA13.4	Natural England	HRA			<p>In light of our advice to screen in the likely significant effects of the Draft Strategic Planning Policies on Lee Valley SPA in the HRA, we would recommend revisiting the avoidance and mitigation measures proposed after an appropriate assessment has been carried out. This will enable you to target specific biodiversity issues in light of the most up to date scientific knowledge.</p>	<p>Please see comments above and refer to the second updated response from NE</p>	<p>No change</p>
P OA13.5	Natural England	SP	V3		<p>Policy V3: we note a discrepancy between this policy and paragraph 5.7.36 in the HRA. Paragraph 5.7.36 suggests events held within the LVRP are self-contained within key sites or buildings, suggesting visitors of self-contained events do not use wider parklands on the same trip, however, Policy V3 supports the integration of sporting venues with the wider parklands to support a diverse visitor offer. We would advise clarifying these points and incorporate strategies to avoid and mitigate the possible increase in recreational pressure</p>	<p>Comments noted, the parklands concept refers to the wider open spaces of the Park and not just protected sites. Policy V3 has been amended to clarify. The Area Proposals include the detail relating to recreational use and impact.</p>	<p>Amend V3 as follows: Work with stakeholders to promote and enhance existing sports facilities. Support site and venue development sympathetic to the wider parklands. that integrates sporting venues with the wider parklands to support a diverse visitor offer.</p>
P OA13.6	Natural England	SP	E1		<p>Policy E1: we would advise amending this policy to include the management of designated sites, notably SPA land.</p>	<p>Comment noted. This point is covered in the Authority's Biodiversity Action Plan and in the Area Proposals</p>	<p>No change</p>

P OA13.7	Natural England	SP	B5		Policy B5: we would advise amending this policy to provide greater clarity as well as including other forms of avoidance and mitigation strategies to reduce the potential impacts on sensitive habitats and species.	Policy B5 has been deleted. Amendments have been made to other policies, please refer to the revised B1 and B2. .	Amend Policy B1 and B2 as follows: B1 Development within the Regional Park should be consistent with the Authority's Biodiversity Action Plan and in accordance with a locally approved or DEFRA endorsed biodiversity assessment metric. Protect and enhance the Park's statutorily designated nature conservation sites- B2 Proposals that could result in a net loss of biodiversity will be resisted. Where necessary the Authority will seek planning obligations to deliver the 'mitigation hierarchy' of avoidance, mitigation and compensation. Ensure development proposals within the Park achieve a net gain in natural capital, including net gains in biodiversity.
P OA13.8	Natural England	HRA & SP			Natural England are of the opinion that a meeting between ourselves and the Regional Park would be the easiest manner with which to investigate and discuss our concerns. If the Regional Park are in agreement, a meeting can be organised through our Discretionary Advice Service (DAS) to discuss further the points made in this response. Please follow the link here to reach our DAS webpage for more information.	This meeting has been held under the Discretionary Advice Service. NE have provided a second revised response - as set out below OA 13.9 to OA13.17. An Appropriate Assessment is also being carried out as recommended.	No change
P OA 13.9	Natural England	HRA 2nd response		5.7.33 5.7.34	Natural England's comments are set out below with reference to the relevant sections. Public Access and Associated Disturbance With reference to paragraphs:5.7.33 - 34: Natural England advises that the Lee Valley SPA areas is likely to have a visitor carrying capacity that can sustainably accommodate SPA favourable conservation status and favourable condition status for constituent SSSI's. Ideally, this should be considered at constituent site level (SSSI and possibly SSSI unit) and at a wider landscape-scale including 'functionally-linked' non-SPA land. With this in mind, and noting the proposed growth in housing within riparian boroughs and the wider area we advise that caution should be exercised going forward when making judgments about the capacity for LVRPA to continue to sustainably and effectively manage (ie, to ensure SPA favourable conservation status and SSSI favourable condition can be achieved and maintained within available resources) the effects of an increasing number of visitors.	Comments noted and agreed	No change

P OA13.10	Natural England	HRA 2nd response		5.7.41	<p>In Combination issues: <i>"The HRA for Broxbourne Local Plan has identified an LSE on Lee Valley SPA due to public access associated disturbances, primarily due to the impacts of a strategic mixed use site in close proximity to Turnford & Cheshunt Gravel Pits. It is considered to be likely that the proposals by the LVRPA to improve visitor access will contribute towards the additional recreational pressures resulting from the Broxbourne Local Plan."</i></p> <p>Consistent with this, Natural England notes the statements within paragraph 5.7.42:5.7.42 – <i>"Policies D1 – D4 will see the LVRPA work with riparian authorities with a view to protecting sensitive natural assets such as landscape and biodiversity. In particular, the proposed Policy D2 would see the LVRPA work in partnership with riparian authorities to help ensure that development in the local area avoids detrimental impacts on ecological assets. This could potentially include measures such as helping authorities increase their provision of Suitable Alternative Natural Greenspaces in order to reduce the reliance of local residents on Lee Valley SPA for recreational purposes."</i> ...and advises that, wherever possible, larger-scale developments should seek to adequately provide their own SANGS rather than rely on the Lee Valley Park to address recreational provision. Continued below...</p>	Comments noted	No change
P OA13.11	Natural England	HRA 2nd response		5.7.34	<p>This recognises the issues relevant to 5.7.34 (see above), noting the likely increases in visitors associated with regional growth will be challenging in its own right. In addition to this, it is important that Lee Valley SPA, its constituent SSSI's and significant biodiversity does not become increasingly isolated by intensive development. Instead, the relevant Land Use Plans should seek to safeguard and ensure there is suitable green infrastructure (wildlife habitats, networks and corridors) within the wider landscape of the surrounding Boroughs outside Lee Valley Park to help meet targets for sustainability and environmental resilience.</p>	Comments noted and agreed. The Authority endeavours to secure additional green infrastructure as part of new development in its responses to planning consultations.	No change
P OA13.12	Natural England	HRA 2nd response			<p>Natural England welcomes and supports the proposed promotion of sustainable transport (including cycling and walking) to the Lee Valley Park and the commitment to manage visitor pressure (eg, by directing people away from sensitive areas). We agree this will become an increasingly vital role of the LVRPA because of future development in riparian authorities, and provide further advice in our comments above.</p>	Comments welcome	No change
P OA13.13	Natural England	HRA 2nd response		5.83 – 5.85	<p>Natural England also supports the collection of bird and visitor survey data (eg, paragraphs 5.83 – 5.85) to enable further assessment and assist decision-making and management of the Lee Valley Park to ensure designated site and biodiversity objectives are met.</p>	Comments noted and welcomed	No change

P OA13.14	Natural England	HRA 2nd response		5.8.6	5.8.6 – <i>“It is concluded that an LSE on Lee Valley SPA, as a result of public access associated disturbances caused by the Park Plan: Part 1 Strategic Policies update alone and in-combination, can be objectively ruled out at this stage.”</i> Natural England acknowledges the positive track-record of conservation management undertaken by Lee Valley Regional Park Authority for the benefit of Lee Valley SPA (and its constituent and Park-wide SSSI's). Whilst the Lee Valley Park Plan should not be wholly regarded as 'necessary to the management of the SPA', there are local and Park-wide policies that endeavour to significantly assist conservation management of the Lee Valley SPA and to date, these have been regarded as adequate to ensure recreational disturbance enabled by the Lee Valley Park Plan can be discounted as a likely significant effect.	The Authority welcomes the decision that an LSE on the SPA as a result of public access associated disturbances caused by the draft strategic policies can be ruled out.	No change although it should be noted that a number of policies under Biodiversity have been amended and strengthened.
P OA13.15	Natural England	HRA 2nd response		5.8.6	For the reasons set out above, Natural England recognises the significant challenges of the 'in combination' context for this Plan, notably effectively managing increasing visitor numbers whilst still ensuring SPA favourable conservation status can be achieved and maintained. Accounting for the LVRPA's strong track record in conservation management and noting the Lee Valley Park Plan provides a strategic framework with revised policies that clearly promote the protection and enhancement of designated sites and biodiversity and HRA-compliant projects, Natural England can agree with the conclusion of 5.8.6.	The Authority welcomes the decision that an LSE on the SPA as a result of public access associated disturbances caused by the draft strategic policies can be ruled out.	No change although it should be noted that a number of policies under Biodiversity have been amended and strengthened
P OA13.16	Natural England	HRA 2nd response		5.12.11	<u>Air Pollution</u> Natural England agrees with the conclusions of paragraph 5.12.11 – <i>“It is considered that an LSE on Epping Forest SAC, as a result of air pollution caused by the Park Plan: Part 1 strategic policies in-combination with development plans in riparian and neighbouring authorities, cannot be objectively ruled out at this stage.”</i> ...broadly for the reasons set out in this section of the HRA.	Comments noted, the Authority is carrying out an AA to assess this matter in relation to Air Pollution. Natural England will be involved in this process.	Further changes to policy likely
P OA13.17	Natural England	HRA 2nd response		5.12.11 & 6.3.1	Natural England is currently advising the respective HMA MoU authorities about the scope of their Habitats Regulations Assessments for Epping Forest SAC, and we are awaiting the latest revisions including traffic modelling and air quality assessment from Epping Forest DC. For these HMA assessments, the local road network is the focus of vehicle traffic assessment and this (alongside any uplift associated with the regionally-significant M25) is likely to be relevant to the Lee Valley Park Plan and any further consideration within an Appropriate Assessment. It is recognised by Natural England that the Lee Valley Park is managing a visitor destination as a comparable alternative to Epping Forest SAC and, in so doing, may helpfully reduce visitor pressure (and potentially associated vehicle traffic) on Epping Forest SAC. More visitor survey information is necessary to assess this matter. Natural England can advise further about the scope of an appropriate assessment consistent with paragraph 6.3.1., and suggest that this should involve an initial meeting	Comments noted, the Authority is carrying out an AA to assess this matter in relation to Air Pollution. Natural England will be involved in this process.	Further changes to policy likely

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P OA15.0	Transport for London Commercial Development	SP			Thank you for consulting TfL Commercial Development (TfL CD) on the Lee Valley Regional Park Authority (LVRPA) draft Park Development Framework. Please note that the following comments represent the views of TfL CD acting in its capacity as a local landowner and do not form part of a wider TfL statutory response. Our colleagues in TfL Spatial Planning have provided a separate response, in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.	Comments noted	No Change
P OA15.1	Transport for London Commercial Development	SP			TfL CD Objectives. TfL CD has been set an ambitious target by the Mayor to commence the development of 10,000 new homes in London by 2021; at least 50% of these new homes must be genuinely affordable. To meet these objectives, TfL CD has identified sites across London that have capacity to accommodate residential development, including several in close proximity to the Lee Valley Regional Park. Excellent placemaking and 'good growth by design' are at the core of our development projects and we would expect them to respect and enhance the setting of the Park.	Comments noted, the Authority would welcome early engagement on projects and placemaking that relate to development sites in close proximity to the Park.	No Change
P OA15.2	Transport for London Commercial Development	SP		2.3, 2.5	Strategic Context (p4). In paragraphs 2.3 and 2.5, we would suggest reference to the latest (and longer-term) population projections for London as provided in the 2017 draft London Plan, the 2017 Strategic Housing Land Availability Assessment (SHLAA) and 2017 Strategic Housing Market Assessment (SHMA).	Comments noted, the revised figure for population growth in the draft London Plan will also be referenced.	Add the following text to paragraph 2.3 "According to the London Plan, London's population is expected to rise from 8.2 million in 2011; to 9.20 million in 2021; 9.54 million in 2026; 9.84 million in 2031; and 10.11 million in 2036. The draft London Plan 2017 provides a longer term and revised population projection of 10.8 million by 2041. "
P OA15.3	Transport for London Commercial Development	SP		2.42 - 2.47	Current Planning Policy Context (P8). We welcome LVRPA recognition that the Park is in an urban context subject to development pressures and located within the LLDC and the Upper Lea Valley Opportunity Area. There are also four Housing Zones situated close to or partly within the Lee Valley Regional Park (Blackhorse Lane and Northern Olympic Park, North Tottenham, Meridian Water and Edmonton Futures, and Poplar Riverside). TfL owns and controls land located within the opportunity areas and housing zones which have great potential to meet the need for additional housing (particularly affordable housing), new jobs and transport enhancements which would improve access to the Park.	Comments noted. Housing zones are referenced under para 2.47	No Change
P OA15.4	Transport for London Commercial Development	SP		2.49, 2.50	Paragraphs 2.49 and 2.50 highlight three objectives of the 2017 draft London Plan. TfL CD would suggest that other key objectives of the draft Plan should also be referred to, including: 'good growth' to deliver thousands of genuinely affordable homes and creating a more inclusive, greener and safer city. In particular, there will be a need for sustainable growth in the London boroughs that border the park in order to meet new housing targets and deliver affordable housing. Policy H1 of the draft Plan requires housing development to be optimised around transport hubs, of which there are many close to the boundary of the Park. The need for good growth and a significant increase in housing delivery in sustainable locations close to the Park could be recognised within the LVRPA in line with the draft London Plan.	Comments noted. The Regional Park is located in a growth corridor, policy therefore seeks to protect the broader amenity of the Park, for example in relation to tall buildings (Policy L5) and large scale development. However additional text is needed to cover 'good growth' objectives and this will be added to the end of paragraph 2.50.	Add new text at the end of paragraph 2.50 as follows: "The draft London Plan also sets an overarching objective to plan for 'good growth' - "sustainable growth that works for everyone" aiming to deliver genuinely affordable homes and a more socially integrated and sustainable city. As part of the Lee Valley Opportunity Area there will be an increase in housing development and 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."
P OA15.5	Transport for London Commercial Development	SP		4.27 - 4.32	This approach to higher density in the most accessible and sustainable locations also reduces pressure for development in the Green Belt and on MOL; as such references to 'good growth' adjacent to the Park might be included in paragraphs 4.27 – 4.32.	Comments noted, most of the Park is designated Green Belt or MOL and development already planned adjacent to the Park as well as further potential to develop at other 'sustainable locations' will impact upon the Park, its openness, landscape quality, natural and heritage assets.	No change

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P OA15.6	Transport for London Commercial Development	SP		5.4	Strategic Policies (p36). The LVRPA has an important as a statutory consultee on applications for development bordering the LVRPA which might impact upon the Park. Much of the Lee Valley Regional Park is situated within an urban context in close proximity to areas which have been recognised in policy as having the potential to deliver significant amount of new development, particularly housing. It is therefore important that the policies of the LVRPA do not constrain new development and good growth that is located outside of the Park. Indeed they should support the objectives and policies of the draft London Plan and adjoining LPA's Local Plans.	Comments noted. Policies seek to secure the best outcome for the Regional Park, manage development pressure and realise opportunities to enhance the Park and visitor enjoyment.	No Change
P OA15.7	Transport for London Commercial Development	SP	L5	5.6	Conserve and enhance the Park's landscape character, key views and openness (P37). The draft London Plan encourages the delivery of higher density development around transport hubs, which may include tall buildings in suitable locations, subject to a design-led approach assessing the visual, functional and environmental impacts. The relevant LPA will consider the impacts of tall buildings as part of planning application process for proposed development located outside of the Park. The impacts of new development on the Park will be a material consideration in the assessment of planning applications.	Comments noted.	No Change
P OA15.8	Transport for London Commercial Development	SP	L1	5.6	TfL CD will work with LVRPA, LLDC, London boroughs and other relevant stakeholders to ensure that development on our land is appropriately designed in terms of height, scale, massing, the protection of important local views and the impact on nearby Green Belt and MOL.	Comments noted and collaborative working welcomed	No Change
P OA15.9	Transport for London Commercial Development	SP	D3	5.11	Influence major new development within and adjacent to the Park to ensure that the Park is protected and enhanced (P38). TfL CD suggests that D3 should also include reference to other key strategic planning policies of the draft London Plan such as 'good growth' (policies GG1 – GG6), delivering good design (Policy D2) and optimising housing delivery in the most accessible and sustainable locations (policy H1) outside the Park.	Comments noted. However it is considered that Policy D3 is unclear and confusing and given given revisions to policies under 5.5 'Effective use and management of land', it will be deleted.	Delete Policy D3 Support development that is consistent with other strategic policies, particularly recreational, leisure and sporting facilities.
P OA15.10	Transport for London Commercial Development	SP			Concluding Remarks. We hope that these representations are helpful and we look forward to working with you in the coming years as we deliver high quality, housing-led, mixed use schemes to meet needs in areas around the Park.	Comments noted and welcomed	No Change
P OA16.0	Transport for London Spatial Planning & Crossrail 2	SP		2.3	This should reference the latest population projections in the new draft London Plan	Comments noted. Text will be amended - see P OA15.2 above	Please refer to amendment above under POA15.2
P OA16.1	Transport for London Spatial Planning & Crossrail 2	SP		2.4	The latest London Plan Strategic Housing Land Availability Assessment (SHLAA) and Strategic Housing Market Assessment (SHMA) should be mentioned here	Comments noted, all the figures are referenced back to the adopted London Plan. There may be further changes to the draft London Plan which is not due for adoption until autumn of 2019. The figures in themselves to not change the fact that the Park will be facing significant growth in visitors due to increase in population growth.	No change
P OA16.2	Transport for London Spatial Planning & Crossrail 2	SP		2.12	It would be beneficial to state here that the upgrade from two to four tracks will also necessitate the closure of any remaining level crossings.	Comments noted, minor amendment will be added to para 2.12	Add the following to the end of paragraph 2.12: It is understood that the upgrade from two to four tracks would require the closure of any remaining level crossings
P OA16.3	Transport for London Spatial Planning & Crossrail 2	SP		2.14	This is not an extension of Crossrail 1 - it is a part of the core route and will also affect the Stratford area of the Lower Lee Valley (in Newham). Include (Elizabeth Line) in brackets because this is how the Crossrail 1 service will be known.	Comments noted, text will be amended to refer to Crossrail (Elizabeth Line) and reference to extension will be removed.	Amend Para 2.14 as follows: The extension of Crossrail 1 (Elizabeth Line) will also affect parts of the Lower Lee Valley in London Borough of Tower Hamlets and Stratford in the London Borough of Newham

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P OA16.4	Transport for London Spatial Planning & Crossrail 2	SP		Fig 2.2	Figure 2.2 - The routing of the West Anglia main line is incorrect – it should go to Harlow rather than Hertford East and through Hackney to Liverpool Street. Other railways should also be shown. Proposed 4-tracking should include (part of) Crossrail 2. It would also be helpful to label Liverpool Street station.	Comments noted Fig 2.2 will be amended as requested regarding West Anglia mainline and Crossrail 2.	Amend Fig 2.2 to show correct routing of West Anglia main line and Crossrail 2.
P OA16.5	Transport for London Spatial Planning & Crossrail 2	SP		2.15	Land Value capture is not currently part of the funding model for Crossrail 2. Please remove this section to avoid any misunderstanding.	Comment noted - the last sentence will be deleted	Amend paragraph 2.15 as follows:This is a type of public financing that recovers some or all of the value that public infrastructure generates for private landowners. It is understood that this will form part of the funding model for Cross Rail 2.
P OA16.6	Transport for London Spatial Planning & Crossrail 2	SP		2.37	Although the 2050 Infrastructure Plan provides context it is not part of current policy.	Comments noted	No change
P OA16.7	Transport for London Spatial Planning & Crossrail 2	SP		2.43	Small factual correction "The Olympic Legacy Supplementary Planning Guidance (OLSPG), published in July 2012, <u>and replaces the Lower Lea Valley OAPF where the two areas overlap.</u> This has been taken forward through the adopted Local Plan (2015) prepared by the London Legacy Development Corporation (LLDC). Work has recently commenced on revising this plan." For reference see OLSPG page 9 and Appendix 7.1 about the OLSPG and LLV OAPF boundaries.	Correction noted	Paragraph 2.43 to be corrected as follows: "The Olympic Legacy Supplementary Planning Guidance (OLSPG), published in July 2012, replaces the Lower Lea Valley OAPF where the two areas overlap. This has been taken forward through the adopted Local Plan (2015) prepared by the London Legacy Development Corporation (LLDC). Work has recently commenced on revising this plan."
P OA16.8	Transport for London Spatial Planning & Crossrail 2	SP		2.43	Note that the OAPF is currently being updated.		Add text to the end of paragraph 2.42 as follows: The Lower Lea Valley OAPF is currently being updated.
P OA16.9	Transport for London Spatial Planning & Crossrail 2	SP		4.9 4.37 - 4.40 5.3	4.9/4.37 – 4.40/5.3 - TfL welcomes the desire to have more people travelling by public transport and active modes. It would be useful to reference the target in the draft London Plan and Mayor's Transport Strategy (MTS) for 80% of all trips in London to be by walk, cycle or public transport by 2041. It would also be helpful to state that the LVRPA and riparian authorities will aim to control the supply of car parking and manage it in such a way that people are encouraged to seek alternative means of access where these are available.	Comments noted. A reference to the Mayor's Transport Strategy and target will be added to Section 2 after para 2.48. The Authority promotes public transport as the means of access to all its sites and venues and the major venues all have travel plans (since 2007). The Authority has also recently adopted a Cycling Strategy in partnership with the riparian boroughs and councils. However in many cases convenient and reliable public transport options are not available or viable.	Add text under Section 2 Strategic Context after paragraph 2.48 "The Mayor's Transport Strategy (MTS) includes a target for 80% of all trips in London to be by walk, cycle or public transport by 2041 and this is reflected in the draft London Plan 2017" . Renumber subsequent paragraphs.
P OA16.10	Transport for London Spatial Planning & Crossrail 2	SP		4.39	Again it is not an extension to Crossrail 1 but the core route and it should not have any impact on severance in and around the Park. We acknowledge that Crossrail 2 should aim to reduce severance – joint working will be required and we would welcome reference to this. Note: Crossrail is one word rather than "Cross Rail"	Comments noted, reference to Crossrail 1 will be deleted. Text will be added to cover the point made on Crossrail 2 and all references to the word Crossrail will be checked and amended.	Amend text under para 4.39 as follows: In many areas accessibility is hindered by the severance effect of linear infrastructure, including roads, railways and waterways. Unless carefully designed, the Crossrail 1 extension and Crossrail 2 could increase these severance effects. Transport for London acknowledge that Crossrail 2 should aim to reduce severance and joint working will be required to secure this. Ensure use of the word Crossrail appears as one word
P OA17.0	Thames Water	SP			As you will be aware, Thames Water is the statutory water and sewerage undertaker for the majority of the Lee Valley Regional Park (LVRP) and are hence a "specific consultation body" in accordance with the Town & Country Planning (Local Planning) Regulations 2012. As a statutory undertaker in London and the Lee Valley, Thames Water operate, manage and invest in significant water and wastewater infrastructure in the LVRP. We have the following comments on the consultation document	Comments noted	No Change

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P OA17.1	Thames Water	SP			General Comments on Water/Wastewater Infrastructure - A key sustainability objective for the preparation of Local Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. New development should be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the National Planning Policy Framework (NPPF), March 2012, states: "Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver:.....the provision of infrastructure for water supply and wastewater.." Paragraph 162 of the NPPF relates to infrastructure and states: "Local planning authorities should work with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas."	Comments noted - wastewater infrastructure and development will be co-ordinated by the local planning authorities; this is not a matter the Authority.	No Change
P OA17.2	Thames Water	SP			The web based National Planning Practice Guidance (NPPG) published in March 2014 includes a section on 'water supply, wastewater and water quality' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that "Adequate water and wastewater infrastructure is needed to support sustainable development" (Paragraph: 001, Reference ID: 34-001-20140306). Policy 5.14 of The London Plan, March 2015 is directly relevant as it relates to Water Quality and Wastewater Infrastructure and Policy 5.15 relates to Water Use and Supplies. Policy S15 of the new London Plan draft for Public Consultation, December 2017, relates to water infrastructure.	Comments noted - this is a matter for the local planning authorities.	No Change
P OA17.3	Thames Water	SP			It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.	Comments noted - this is a matter for the local planning authorities	No Change
P OA17.4	Thames Water	SP			Thames Water seek assurance through the Plan that operational development, which will continue to be necessary on operational sites within the Park, will be considered favourably. Policies that seek to protect the openness of the Park should not unduly restrict essential water/wastewater infrastructure provision. Thames Water has a statutory obligation imposed through the Water Industry Act 1991 to treat and supply water. Text should be included in the Local Plan a which states that providing need can be demonstrated then operational development will be considered favourably on operational land.	Comments noted - this is a matter for the local planning authorities to consider.	No change
P OA17.5	Thames Water	SP			The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water's asset plans and as from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.	Comments notes	No Change

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P OA17.6	Thames Water	SP			From 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. Our economic regulator Ofwat has published new rules, which say our charges should reflect: - fairness and affordability, - environmental protection - stability and predictability, - transparency and customer-focused service. The changes mean that more of our charges will be fixed and published, rather than provided on application, enabling developers to estimate costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges. We published our new charges on 1 February 2018. Please see our website for further information: https://www.thameswater.co.uk/-/media/Site-Content/Thames-Water/Help-and-Advice/Helpful-literature/accord1/Tariff-changes-Feb-2018/Infrastructure-Charges-Schedule-2018-19.pdf	Comments noted	No Change
P OA17.7	Thames Water	SP			Thames Water therefore recommends that developers engage with them at the earliest opportunity to establish the following: - The developments demand for water supply and network infrastructure both on and off site; - The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and - The surface water drainage requirements and flood risk of the development both on and off site and can it be met.	Comments noted	No Change
P OA17.8	Thames Water	SP		4.41 4.42	In light of the above comments and Gvt guidance we recommend the Local Plan include the following policy/supporting text: <u>Proposed New Water/ Wasterwater Infrastructure Text</u> . "Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades. The LVRPA will work with the LPA to seek to ensure that there is adequate water & wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water & wastewater net-work reinforcement requirements. Where there is a capacity constraint the LPA will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development. The development or expansion of water supply or waste water treatment facilities, will normally be supported, either where needed to serve existing or proposed new development, or in the interests of long term water supply & waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised."	Comments noted - the Park Development Framework is not a Local Plan. Proposed water and wastewater infrastructure text should be included in local plans not the Regional Park Authority's Strategic Policy document.	No change

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P OA17.9	Thames Water	SP		4.41 - 4.42	Flood Risk and SuDS The NPPF states at paragraph 100 that a sequential approach should be used by local planning authorities to avoid inappropriate development in areas at risk of flooding. The NPPG and Flood & Water Management Act sets out that this applies in areas to be at risk from forms of flooding other than from river and sea including from 'overwhelmed sewers and drainage systems'. Any flood risk strategy/policy should therefore include reference to sewer flooding and an acceptance that flooding could occur away from the flood plain as a result of development where off site infrastructure is not in place ahead of development.	Comments noted	No Change
P OA17.10	Thames Water	SP			It is vital that sewerage/waste water treatment infrastructure is in place ahead of development if sewer flooding issues are to be avoided. It is also important not to under estimate the time required to deliver necessary infrastructure, for example: - local network upgrades take around 18 months - sewage treatment works upgrades can take 3-5 years Thames Water recognises the environmental and economic benefits of surface water source control, and encourages its appropriate application, where it is to the overall benefit of their customers. However, it should also be recognised that SuDS are not appropriate for use in all areas, for example areas with high ground water levels or clay soils which do not allow free drainage. SuDS also require regular maintenance to ensure their effectiveness.	Comments noted	No Change
P OA17.11	Thames Water	SP		4.41 - 4.44	Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change. SUDS not only help to mitigate flooding, they can also help to: - improve water quality, - provide opportunities for water efficiency, - provide enhanced landscape and visual features, - support wildlife, - and provide amenity and recreational benefits.	Comments noted - the Authority supports SUDs and the benefits they can bring in terms of water quality and wildlife and it would be appropriate to add text in support under the new policy F2.	Policy F2 add text to the end of the sentence as follows: "The Authority will...Enhance the Park's function in mitigating and reducing flood risk to the surrounding areas, by natural flood management and sustainable measures, and by supporting SUDs where appropriate ".
P OA 17.12	Thames Water	SP			Proposed Change: With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the wastewater system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding. We therefore request that the following paragraph should be included in the Local Plan: "It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."	Comment noted - this wording should be included in the relevant riparian local plans which will then apply to development within the Regional Park when appropriate	No change
P SR26.0	Royal Gunpowder Mills Waltham Abbey Ltd				For clarity, there are two charities with responsibilities towards the site. The Waltham Abbey Royal Gunpowder Mills Charitable Foundation Ltd manages the endowment and is the freeholder. We are the Waltham Abbey Royal Gunpowder Mills Company Limited, and we hold a long lease and manage the site and its visitor attraction and activities. We welcome the direction of the LVRPA strategy, and note its new emphasis on conserving and enhancing the Park's historic environment.	Comments noted and welcomed.	No change

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P SR26.1	Royal Gunpowder Mills Waltham Abbey Ltd	SP			We agree that the strategic planning aims set out in the document soundly support the Park's overall vision to be a 'world class leisure destination'. We note the aim to serve as multifunctional green infrastructure resource for London.	Comments noted and welcomed.	No change
P SR26.2	Royal Gunpowder Mills Waltham Abbey Ltd	SP	H1 H2 H3 D3		<u>Conserve and enhance the cultural heritage of the Park and its historic environment.</u> We welcome in particular the new emphasis on cultural heritage and historic environment and increasing access to historic sites, their interpretation, use for leisure, health and recreation, and support of cultural heritage and historic environment by arts, festivals and fairs (Strategic policies H1, H2, H3) and avoidance of detrimental impact on protected of ecological and heritage assets (D2).	Comments and support for policies noted.	No change
P SR26.3	Royal Gunpowder Mills Waltham Abbey Ltd	SP		3.16	Revealing history (3.16): The combined consultation documents state at many points that Lee Valley is rich in heritage assets (largely industrial). Many of the historic sites mentioned in the consultation have connected up with each other as members of the Lee Valley Heritage Alliance (LVHA), and more are joining. It is likely that these heritage assets, as each becomes better known and visitorship grows, will support new types of visitors for the Lee Valley. We suggest that LVHA would be a valuable partner in achieving your strategic aims, including new linkage and integration (Strategic policies A1 – A5), through the 'industrial story' from London to Ware. Each site can contribute interpretation of the industrial landscape features increasing heritage value, identity and image of the Park, and assist achievement of 'revealing history'.	Comments noted - the Authority has acknowledged LVHA as a partner.	No change
P SR26.4	Royal Gunpowder Mills Waltham Abbey Ltd	SP			<u>Conserve and enhance the Park's biodiversity</u> We responded separately to your Biodiversity Action Plan. We have nothing further at this point to add.	Comments noted and thank you for responding to the draft BAP	No change
P SR26.5	Royal Gunpowder Mills Waltham Abbey Ltd	EvB		2.13 - 2.34	Access: Having commented above under 'bridges and access' specifically as it concerns the Royal Gunpowder Mills, we comment here in the broader context of access and counteracting the north-south linear character by east-west access. We agree that this 'greater connectivity' will enable local and tourist connection. The provision of green routes to Network Rail and TFL stations will encourage and improve local and tourism flow across the Lee Valley Regional Park and eliminate, for example, the existing approach to the Royal Gunpowder Mills and Waltham Abbey via an unattractive, busy road.	Noted and agreed	No change
P SR26.6	Royal Gunpowder Mills Waltham Abbey Ltd	EvB		2.3	Suggested amendment underlined: Walking para 2.30 There is limited accessibility between <u>The Royal</u> Gunpowder Mills and adjoining routes and sites such as the Lee Navigation and Cheshunt Marsh.	Amendment noted	Amend text under para 2.30 of the Evidence Base as follows: "There is limited accessibility between the Royal Gunpowder Mills and adjoining routes and sites such as the Lee Navigation and Cheshunt Marsh".
P SR26.7	Royal Gunpowder Mills Waltham Abbey Ltd	EvB		4.36	Sites providing access to nature. 4.36 Located just south of Cornmill Meadows is Royal Gunpowder Mills site. The chemicals and pollutants that were once integral to the site's productive activities are no longer due to decontamination of the land. <u>Decontamination works removed the bulk of chemicals and pollutants from areas of the site, most notably at the south, allowing a visitor attraction to be established. Guided tours</u> The site now supports <u>limited public</u> access to woodlands (Waltham Abbey Woods SSI) <u>in</u> which a range of flora and fauna <u>thrive</u> including a population of fallow deer. The canopy has largely regenerated here from coppice stools and is dominated by Alder trees, with Sycamore, Ash, Poplar and Crack Willow.	Amendments noted - these changes will be made.	Amend text at para 4.36 of the Evidence Base as follows: "Located just south of Cornmill Meadows is the Royal Gunpowder Mills site. The chemicals and pollutants that were once integral to the site's productive activities are no longer due to decontamination of the land. Decontamination works removed the bulk of chemicals and pollutants from areas of the site, most notably at the south, allowing a visitor attraction to be established. Guided tours The site now facilitate supports limited public access to woodlands (Waltham Abbey Woods SSSI) in which a range of flora and fauna thrive including a population of fallow deer. The canopy has largely regenerated here from coppice stools and is dominated by Alder trees, with Sycamore, Ash, Poplar and Crack Willow.

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P SR26.8	Royal Gunpowder Mills Waltham Abbey Ltd	EvB		6.17	Industrial heritage -A key site is at Gunpowder Mills, Waltham Abbey, which includes 21 listed buildings including the Grade 1 listed Gunpowder Incorporating Mill. The site was used for over 300 years for explosives and propellant manufacture. The...	Amendment noted	Amend text at para 6.17 of the Evidence Base as follows: "A key site is at the Royal Gunpowder Mills, Waltham Abbey, which includes 21 listed buildings including the Grade 1 listed Gunpowder Incorporating Mill. The site was used for over 300 years for explosives and propellant manufacture. "
P SR26.9	Royal Gunpowder Mills Waltham Abbey Ltd	EvB		6.27	Protecting and enhancing the heritage resource. ...There are also likely to be other areas where the heritage has yet to be realised within the P ark.	Minor amendment noted	Minor amendment to para 6.27 of the Evidence Base as follows: "There are also likely to be other areas where the heritage has yet to be realised within the P ark."
P SR28.0	Markfield Beam Engine & Museum	SP		2.3	Para 2.30 indicates: "Paragraph 126 of the NPPF indicates that planning authorities should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats." MBEAM would argue that the MBEAM facilities and wider site are very much in danger. Maintaining and operating a working Victorian bean engine is a costly business – and is extremely difficult to support from public donations -and is not something that readily attracts charity grant funding support. Additionally, the surrounding site (which comprises rare original features of a Victorian sewage works, remains unprotected and neglected. The Museum Trust would very much like to bring this within the control of the Museum in order to be able to provide a full picture of a Victorian public health facility (Tottenham was one of the earliest pioneering communities to develop its own sewage works in 1852). A further potential danger to the site comes from the Crossrail 2 proposals, in which tunnelling alignment passes within metres of the MBEAM buildings and site, with serious potential to undermine this heritage asset.	Comments and issues regarding the wider site and Crossrail 2 proposals noted.	No change
P SR28.1	Markfield Beam Engine & Museum	SP		3.16	Para 3.16 denotes the significance of local industrial heritage, but fails to include MBEAM – which as noted above, is an important pioneering example (praised by social reformer Edwin Chadwick and engineer Joseph Bazalgette). It also has a history related to contagious diseases in London.	Comments noted and agreed the MBEAM should be included as part of the local and the Park's heritage interest under para 3.17.	Amend text at para 3.17 to add at the end of the paragraph, the following : At Tottenham the Markfield Beam Engine and Museum features a Grade 2 listed engine hall housing a restored, working steam-powered beam engine dating from 1888. The building is set in Markfield Park, in the grounds of the former Tottenham Sewage Works once a key public health facility serving the area (1850's to 1964) - together an example of industrial heritage of social and engineering importance.
P SR28.2	Markfield Beam Engine & Museum	SP		3.22	Para 3.22 indicates: "Appreciation of heritage features contributes positively to the identity and image of the Park, as well as increasing the attractiveness of the Park for visitors. However, there are a number of features where heritage value could be enhanced. There remains potential to improve accessibility and interpretation at sites including East India Dock Basin, Rye House Gatehouse and Royal Gunpowder Mills." The examples given again fail to include MBEAM – which must be a significant asset worthy of enhancement.	Comments noted and agreed ; the MBEAM will be added as a further example under para 3.22	Amend text under 3.22 as follows: "There remains potential to improve accessibility and interpretation at sites including Markfield beam Engine & Museum , East India Dock Basin, Rye House Gatehouse and Royal Gunpowder Mills."
P SR28.3	Markfield Beam Engine & Museum	SP	H1, H2	5.3 5.7	The Strategic planning aims identified in para 5.3 indicate the need to: "Conserve and enhance the cultural heritage of the Park and its historic environment." This is further elaborated in Para 5.7: "H1: Conserve and enhance the Park's cultural heritage, including its archaeology, historic buildings and structures and their settings. H2: Support proposals to enhance access to and interpret heritage assets, recognising their value in providing opportunities for leisure, health and recreation." MBEAM must be included in this strategy.	Comments noted and agreed	No change

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P SR28.4	Markfield Beam Engine & Museum	EvB		3.24	The Policy Evidence Base Document further identifies the above case: "Enjoying and learning about heritage 3.24 The Park offers a number of opportunities to enjoy heritage in the Park. This is covered in more detail in the next section. A key feature is the Markfield Beam Engine and Museum housed in its original Grade II listed engine house in Tottenham."	Comments noted	No change
P SR28.5	Markfield Beam Engine & Museum				We note the statement in the 2011 Adopted Proposals for Area 3, which indicate support for the MBEAM. Some 7 years later, little has materialised from LVHA to demonstrate that support. Further comments are a reflection of that situation. In general, whilst MBEAM benefitted from Haringey's Lottery Grant efforts some 10 years ago, this enabled provision for restoration work. However, there has been minimal wider support from public authorities to bolster the voluntary-only management of the Museum in operating a public facility of significant heritage value. Much remains in need of further work and development to realise the full potential of the Museum, beam engine and the wider site for public benefit and to pay its full part in the life of the Lee Valley. MBEAM is also a Member of the Lee Valley Heritage Alliance.	Comments Noted - these apply to adopted Area 3 proposals not the subject of this consultation. However they provide a useful context to the comments made above regarding the Strategic Policies and have been noted. Area 3 Proposals will be revised in the next few years.	No change to Policy documents.
P SR28.6	Markfield Beam Engine & Museum	SP			The Museum Trust remains available to liaise with the LVPA, and explore how support for MBEAM in line with the declared policy intentions can be made a reality.	Comments noted and welcomed	No change
P SR30.0	Sport England	SP			Thank you for consulting Sport England on the Lee Valley Regional Park Plan: Part 1 Strategic Policies. Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields.	Comments noted	No change
P SR30.1	Sport England	SP			The new Sport England Strategy 'Towards An Active Nation' (2016-21) identifies key changes in the delivery of the strategy: •Tackle inactivity: more money and resources •Invest in children and young people to build positive attitudes to sport and activity •Help those currently active to carry on, but at a lower cost to the public purse •Put customers at the heart of what we do/be welcoming and inclusive •Help sport to keep pace with the digital expectations of customers •Encourage stronger local collaboration to deliver a joined-up experience for customers •Working with a wide range of partners, using our expertise and investment to align •Applying behaviour change principles to encourage innovation to share best practice. Sport England has assessed this consultation in the light of Sport England's Planning for Sport: Forward Planning guidance http://www.sportengland.org/facilities-planning/planning-for-sport/	Comments noted	No change
P SR30.2	Sport England	SP			The overall thrust of the statement is that a planned approach to the provision of facilities and opportunities for sport is necessary, new sports facilities should be fit for purpose, and they should be available for community sport. To achieve this, our objectives are to: - PROTECT sports facilities from loss as a result of redevelopment - ENHANCE existing facilities through improving their quality, accessibility and management - PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future.	Comments and Sport England objectives noted	No change

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P SR30.3	Sport England	SP			Sport England believes that sport has an important role in modern society and in creating sustainable and healthy communities. Sport and physical activity is high on the Government's national agenda as it cuts across a number of current topics that include health, social inclusion, regeneration and anti-social behaviour. The importance of sport should be recognised as a key component of development plans, and not considered in isolation. The following comments are provided within the context of: <ul style="list-style-type: none"> • The National Planning Policy Framework (DCLG, 2012). • Sport England's Planning for Sport webpages (2018). 	Comments noted and supported.	No change
P SR30.4	Sport England	SP		1.5-1.9	Strategic content - It is positive that the plan takes into account the proposed increases to the wider population surrounding the park. It is also encouraging that the plan also notes the current tests to the parks existing policies. It is our thought that the plans vision and policies could be strengthened by the inclusion of a specific policy to protect, provide and enhance sports facilities in line with paragraph 74 of the NPPF the park is well supported by evidence to support a policy along these lines as the surrounding Local authorities of East Hertfordshire, Broxbourne, Epping Forest, Haringey and Newham have an adopted PPS, and Enfield, Hackney and Waltham Forest are working towards a robust and up to date evidence base. The park could use this alongside the surrounding LA's Built Facilities strategies to aid the park to obtain contributions from developments in the area to maintain the existing and provide additional sports facilities to meet demand.	Comments noted, policy does need to be amended to strengthen its reference to sports provision, please refer to the revised policy V3.	Work with stakeholders to promote and enhance existing sports facilities and venues. Support site and facility development sympathetic to the wider parklands. that integrates sporting venues with the wider parklands to support a diverse visitor offer.
P SR30.5	Sport England	SP		1.11	It is positive that an evidence base has been produced for the park and Sport England supports the use of this background document which provides evidence and up to date information on the provisions for sport and recreation. We would like to suggest the inclusion of the evidence bases produced by the surrounding local authorities as these provide an in depth look at playing pitches and built facilities within the local area and will identify deficiencies and surpluses in accordance with paragraph 74 of the NPPF.	Comments noted and this is a reasonable method for the local planning authorities in meeting their needs and deficiencies. The Authority's focus is on its existing regional and national sporting venues and priority sports..	No change
P SR30.6	Sport England	SP		2.18	This policy relates to the authority's powers to dispose of land which is "not required for the purpose of any of their functions" when decisions are made about which locations will be brought forwards, it is requested that consideration be given to whether any of the sites contain existing sports or recreation facilities such as playing fields which justify protection under paragraph 74 of the NPPF. If they do, then the extent of development in these locations should account for the need to maintain such facilities and site policies should require the facilities to be protected or replaced.	Comments noted. A sites sports and/or recreational use will be considered as part of the decision making process under the Authority's Land and Property Strategy. Any future changes of use or development will need to be undertaken in accordance with the local planning authority development management policies and Local Plan requirements.	No change
P SR30.7	Sport England	SP		2.39, 3.34, 4.39-4.40, 4.45-4.46	2.39 – Natural Capital Accounts for Public Green Space, 3.34 – connecting people with places, 4.39 - 4.40 – pedestrian and bicycle access and 4.45-4.46 - improving health and well-being. – Sport England considers that the design of where communities live and work is key to keeping people active and placemaking should create environments that make the active choice the easy choice. Therefore, it is positive that the plan highlights the capital gains that are provided through the provision of the park, connecting greenspace and facilities. This helps to highlight the importance of open spaces to public health and wellbeing.	Comments noted and welcomed	No change

P SR30.8	Sport England	SP		2.39, 3.34, 4.39-4.40, 4.45-4.46	Sport England would support that these policies are strengthened to have a positive impact on the health of the community by incorporating Active Design and its principles within these policies. Sport England along with Public Health England have launched our revised guidance, Active Design, which intends to inform the urban design of places, neighbourhoods, buildings, streets and active open spaces to promote sport and active lifestyles. The guide sets out ten principles to consider when designing places that would contribute to creating well designed healthy communities and therefore would contribute to the Vision and Strategic Objectives expressed within the Plan. Sport England recommend that the links between the Local Plan and Active Design are enhanced and are really drawn out by having clear references to Active Design, its principles and the Active Design Checklist within the Plan, more information on Active Design, including the guidance, can be found via the following link; http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/	The Authority welcomes the Active Design guidance and principles from Sport England and will consider using these guidelines as a strategic tool for planning and design of our open spaces and travel routes. The Authority already contributes significantly to cycling and walking routes throughout the Park, many of these being used by the community for pleasure and for travel links. Our on-going strategy is to improve our community spaces throughout the Park, considering areas around public shelters and physical activity areas. Where possible the Authority will look to work with key partners on the co-location of community facilities. The Area proposals provide more detail.	No change
P SR30.9	Sport England	SP		4.45 - 4.46	Improving the range and quality of sport facilities and services within the park - Sport England welcomes the principle of new sports, open space and recreation development. To ensure the level of new provision is appropriate the plan should utilize the surrounding authorities evidence. For example, an up to date PPS would estimate the nature and level of needs that may be generated from new development(s) for sporting provision; and establish clear deliverable actions (with associated costs) that have the potential to help meet the need identified. The above approach takes a positive and evidenced based approach for the provision of outdoor sports facilities in accordance with NPPF paragraphs 70 and 73.	Comments noted. The Authority does not produce a PPS but would work with the relevant local planning authorities to ensure new development provides adequately for any increased need whilst safeguarding existing sport and recreation provision.	Please refer to the amendments made to V3 above.
P SR30.10	Sport England	SP		5.3	Strategic Planning Aims – it is positive that the plan includes a strategic aim to improve accessibility of the park for pedestrians and cyclists as this will encourage active transport. Sport England would recommend that the plan seeks to ensure that the sports facilities are given the same consideration by including a strategic aim to protect and enhance the existing sports facilities within the park and provide new facilities to meet demand.	Comments noted and agreed policy is not clear on sports facilities that exist within the Park. Policy V3 has been revised accordingly.	Policy V3 to be revised as follows: "Work with stakeholders to promote and enhance existing sports facilities and venues. Support site and facility development sympathetic to the wider parklands, that integrates sporting venues with the wider parklands to support a diverse visitor offer.
P SR30.11	Sport England	SP	A1 - A5	5.12	Improve accessibility - Sport England welcome the objective to promote and facilitate safe environments for pedestrians and cyclists and increasing opportunities for such travel as this contributes to active and healthy communities. Sport England would support that these policies are strengthened by incorporating Active Design and its principles within these policies.	Comments welcomed - please refer to the response above under P SR 30.8 in respect of Active Design.	No change
P SR31.0	Sustrans	SP			Sustrans is the charity making it easier for people to walk and cycle. We are engineers and educators, experts and advocates. We connect people and places, create liveable neighbourhoods, transform the school run and deliver a happier, healthier commute. Sustrans works in partnership, bringing people together to find the right solutions. We make the case for walking and cycling by using robust evidence and showing what can be done. We are grounded in communities and believe that grassroots support combined with political leadership drives real change fast. Sustrans welcomes the opportunity to comment on the Lee Valley Regional Park Authority (LVRPA) 'Strategic Planning' document.	Comments noted	No change

P SR31.1	Sustrans	SP			The National Cycle Network (NCN) is a network of safe, traffic-free paths and quiet on-road cycling and walking routes. Its 14,000 miles criss-cross the country, linking up villages, towns and cities. The Network is used by almost five million people a year and runs into town centres, past schools and through stunning countryside from Cornwall to the Shetland Isles. Despite its name, the NCN is popular with walkers, joggers, wheelchair users and horse riders as well as people on bikes.	Comments noted, the Authority would endorse the popularity of the NCN especially where it links into and through the Park.	No change
P SR31.2	Sustrans	SP			Key facts about the NCN : <ul style="list-style-type: none"> • Half of trips made on the National Cycle Network are by people walking. • Over 27 million journeys on the Network are made by children travelling to and from school. • 165 million commuting journeys are made on the Network. • One in five people using the Network are new to cycling or starting to cycle again. • Over 85% of people who use the Network feel fitter as a result. • Over 50% of people using the Network feel it helps them save money. 	Comments noted	No change
P SR31.3	Sustrans	SP			In 2014 the National Cycle Network brought the following benefits: <ul style="list-style-type: none"> • Almost 30 million car trips were replaced by people choosing to travel on the Network, meaning less congestion, noise pollution and CO2 emissions. • The Network saved the UK economy over £160 million by reducing the impact of obesity and overweight with £22 million of this saved from the NHS budget. • Holidays and days out on the Network generated £650 million for the economy and supported more than 15,000 jobs. 	Comments noted	No change
P SR31.4	Sustrans	SP			Two key NCN routes run along the River Lea and through the Lee Valley Regional Park (LVRP): NCN 1 (Queen Elizabeth Olympic Park to Roydon) and NCN 61 (Rye House to Ware) (Fig 1 provided shows routes). Sustrans is currently carrying out a review of the National Cycle Network, assessing the Network's present physical condition using our recently completed nationwide audit. We will use this information to work with partners to call on governments for dedicated and ongoing funding for the development and maintenance of existing walking and cycling routes, including the National Cycle Network. We believe that some parts of the Network could and should be better identified, safeguarded and maintained and we urge all local authorities and land owners to prioritise this to ensure more people are able to walk and cycle.	Comments noted. The PDF Area Proposals seek to identify sections within the Park that require enhancement and the Authority's Cycle Strategy provides more detail on cycle path enhancements and co-operative working to aid delivery.	No change
P SR31.5	Sustrans	SP		2.23, 5.12	Acknowledgement of the NCN and its existing and future importance to the Park and its visitors. Sustrans supports LVRPA's recognition of the importance of sustainable transport (2.23) and commitment to improving accessibility to the Park for pedestrians and cyclists (5.12). This aligns with the Mayor's Transport Strategy (2018) , which states page 21 <i>'Making alternative transport options accessible and appealing to all Londoners is the key to reducing car dependency. This means improving street environments to make walking and cycling the most attractive options for short journeys'</i> Walking and cycling routes through LVRP play a significant role in making active travel accessible and appealing to residents of North-East London and Hertfordshire. The existing and future importance of the NCN to the LVRP and its visitors should therefore be acknowledged in the updated Strategic Planning document	Comments noted and agreed. Paragraphs 4.37 to 4.40 should recognise the importance of NCN - drawing on detail in the Evidence Base and the Cycling Strategy	Add the following text at the end of paragraph 4.40. "The principle cycling route, which covers almost the entire length of the Park is the national Cycle Route NCN route 1, which becomes NCN61 for the northernmost section of the Park. For the most part it is on traffic free routes providing access to a wide range of sites and venues within the Park and linking in with other routes. Important to visitors this route together with the other walking and cycling routes also play a role in making active travel accessible and appealing to residents of north east London and Hertfordshire.

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P SR31.6	Sustrans	SP		4.39 - 4.40	Commitment to maintain and improve NCN route surfaces, signage, lighting and accessibility, including removing/modifying barriers and addressing severance issues. The Strategic Plan should also outline commitments from LVRPA to improve and maintain the following aspects of NCN routes within the park: <u>Surfacing:</u> Commitment to maintain and improve NCN route surfaces. For example, we are aware of pot-holed, water-logged, poor quality surfacing between Springfield Park and Markfield Park (shown in Figure 2). Sustrans understands that this stretch of land belongs to the Canals and Rivers Trust, however, we ask LVRPA to collaborate with partners and landowners in order to rectify poor surfacing and to recognise the severity of the issue. Sub-standard surfacing both deters walking and cycling and disproportionately adversely affects the disabled. It also creates risk of injury. Sustrans urges the Strategic Plan to commit to ameliorating poor surfacing, working with landowners to bring it up to the quality detailed in the London Cycling Design Standards (LCDS chpt 7)	Comments noted. The detail about cycle path improvements and measures to address this are set out in the Authority's Cycle Strategy April 2017. The Authority supported LB of Waltham Forest in securing £2.5 million for improvements along Coppermill Lane and other areas to improve cycling and walking opportunities to the Regional Park from Walthamstow. This includes some changes to the aqueduct cycle/pedestrian route	No change
P SR31.7	Sustrans	SP	A5	5.12	<u>Wayfinding:</u> Sustrans welcomes LVRPA's aim to 'enhance signage and wayfinding to improve access to and movement within the Park' (5.12: A5). Some NCN signage is monitored by Sustrans volunteers. There is an opportunity for Sustrans and LVRPA to collaborate in order to ensure that poor or missing NCN signage is reported and replaced in a timely fashion and that signage is in line with the LCDS Chpt 6. We ask LVRPA to commit to review, monitor and replace signage along walking and cycling routes.	Comments noted. The Authority will continue working with key partners such as Sustrans and volunteers to ensure any issues arising concerning waymarking, path maintenance etc are dealt with in a timely fashion. This is however a management issue and too detailed for a strategic policy document. The Authority's Cycling Strategy April 2017 looks in more detail at these matters	No change
P SR31.8	Sustrans	SP		4.9	<u>Accessibility/Severance</u> Sustrans welcomes LVRPA's commitment to improve accessibility to the Park via walking, cycling and public transport. It is concerning that survey data shows 'around two thirds arrive by car' (4.9). Healthy Streets for London (2017) and the Mayors Transport Strategy (2018) both suggest that cycling and walking should be prioritised over car driving in order to increase public health, tackle poor air quality and enable London's growing population to move efficiently and freely around the capital. Sustrans ask that LVRPA commit to reducing the number of car journeys made by visitors to the park, in compliance with the Mayor's Transport Strategy.	Comments noted. The Authority promotes access to its parklands and venues by public transport in the first instance and has recently introduced parking charges and cycle hire facilities at major venues. However until there are better public transport options that offer a useable alternative many visitors will, given the location of many facilities, continue to drive to sites within the Park especially in the northern half of the Park, as detailed in the evidence base and Authority's Cycling Strategy. All visitors to our events are encouraged to use sustainable means of transport.	No change
P SR31.9	Sustrans	SP	A2	4.39 - 4.40 5.12	Sustrans welcomes LVRPA's acknowledgement that certain accessibility and severance issues exist (4.39, 4.40) and its commitment to 'work in partnership to reduce the severance caused by linear infrastructure, through the creation of pedestrian and cycle bridges and crossing points.' (5.12: A2). For example, Horseshoe Bridge and Coppermill Lane Underpass on Quietway 2, which is aligned through Walthamstow Marshes, are two examples of barriers to accessibility of cycle routes. We are aware that many of the bridges within the park do not belong to LVRPA (e.g. Horseshoe Bridge which belongs to the Canals and Rivers Trust), which is why we welcome LVRPA's commitment to work in partnership to rectify these issues.	Comments noted and welcomed	No change

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P SR31.10	Sustrans	SP			Sustrans asks LVRPA to commit to the review and implementation of recommendations for changes concerning barriers and obstacles within the park, with specific reference to accessibility for all users, including those on adapted or enlarged cycles and wheelchairs. <i>Figure 3 included with response is a table that provides detailed issues and costing for resolving barriers and obstacles at following locations: Lea Bridge Rd to the west of Connaught Close, Coppermill Lane parking, Walthamstow Marshes Rail Underpass, to the west of Low Hall Lane Sports Ground.</i>	The detailed comments provided by Sustrans are noted regarding barriers and obstacles and will be considered by officers. These are too detailed for inclusion in the Strategic Policy document. The Authority's Cycling Strategy April 2017 includes measures to address cycle path quality issues including removing barriers, enhancing surface conditions, missing links and lists specific improvements that are needed. This will require co-operative working with a number of partners.	No change
P SR31.11	Sustrans	SP		2.7	Recent improvements to surfacing of towpaths and construction of new bridges, engendered by the 'Olympic Legacy' (2.7), have been commendable, however, the same quality should be applied further north of LB Hackney and LB Newham, along NCN 1 and NCN 61 (within LVRPA's jurisdiction).	Comments noted - this is an important but detailed matter and therefore not appropriate for the Strategic Policy document. PDF Area Proposals identify sections of the Park where access improvements are required. The Authority's Cycling Strategy April 2017 also commits the Authority to working with partner organisations to improve the quality of paths for cycling.	No change
P SR31.12	Sustrans	SP			<u>Lighting:</u> Sustrans would like LVRPA to commit to improved lighting on NCN routes. We understand that there are legitimate ecological reasons for keeping lighting low, particularly in certain wildlife-rich areas, however we ask that LVRPA explore wildlife-friendly lighting solutions, as lack of lighting on cycling and walking routes makes them unsafe and inaccessible, particularly in the winter months. Successful examples of low-impact lighting used include: <ul style="list-style-type: none"> • Newham Greenway: LB Newham have installed lighting and CCTV columns over 5km in an off-highway green route surrounded by trees, which was formerly a dark corridor. They also installed solar LED uplighter studs in some sections. The lighting was designed to minimise impact on bats and other nocturnal wildlife. • Wandle Trail: LB Merton installed 'low level lighting which helps to create a safe and secure route after dark, reduces risk of impact on wildlife corridors, uses high quality, low energy, long-life LED equipment and can be electrically controlled to balance ecological and human needs.' • Riding Lane: 'The London Borough of Ealing was the first London Borough and UK Local Authority to install the innovative 'FalcoPathfinder' solar powered LED cycle path lights. 	Comments noted, this matter is addressed in the Authority's adopted Cycling Strategy April 2017. This recognises that artificial lighting is not appropriate for much of the Park's cycling network, due to its disturbance of wildlife. However the strategy also states that it may be considered for certain key sections that are used by more commuters. In these sections sensitive lighting schemes or luminous road markings would be an appropriate intervention to increase safety for cyclists. Policy D2 as revised would apply.	No change
P SR31.13	Sustrans	SP		2.36 2.37	Increased cycle parking in line with The Draft New London Plan and the London Cycling Design Standards. Sustrans welcomes reference to the London Plan and supports the inclusion of the following objectives in the Strategic Policies document: <ul style="list-style-type: none"> • Improving connections to and between open spaces, to create an integrated network of green space. (2.36) • Ensuring that the green space network within the area supports the development of healthy communities. (2.36) • Promoting Healthy Living – improving health outcomes by increasing physical activity, reducing stress, provision of tranquil areas and removing pollutants. (2.37) • Encouraging Active Living – increasing levels of walking and cycling. (2.37) 	Comments noted	No change

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P SR31.14	Sustrans	SP			Cycle Parking: Sustrans urges a commitment to provision of cycle parking within the document, as detailed in policy T5 of The New London Plan (2017) and in line with the LCDS (Chapter 8) , particularly in the vicinity of visitor centres, cafes etc	Comments noted the Authority's Cycling Strategy, April 2017 commits the Authority to increasing the provision of cycle parking throughout the Park, at key attractions, gateways and by supporting the development of cycle hibs in neighbouring boroughs/districts. The Authority will also be guided by the local planning authorities when providing cycle parking as part of new venue and visitor centre development and comply with policy in the relevant Local Plan	No change
P SR31.15	Sustrans	SP		2.44 - 2.47	Maximum Car Parking: Commitment to push local riparian boroughs and developers to adhere to maximum car parking allowances in new developments bordering the Park, in line with The Draft New London Plan. The Strategic Policies document highlights significant planned development and redevelopment in several areas along the River Lea and Lee Valley (2.44-2.47). While we recognise that LVRPA are unlikely to be responsible for construction of new developments, we encourage LVRPA to push for new developments within London to comply with recommended car parking maximums, detailed in Policy T6 of the Draft New London Plan.	Comments noted - this is a matter for the local planning authorities. The Authority can respond in relation to cycling facilities and the inclusion of cycle hire, parking etc	No change
P SR31.16	Sustrans	SP		2.39	Commitment to increase active travel within the Lee Valley Regional Park, in order to achieve the following objectives outlined in Healthy Streets for London and the Mayor's Transport Strategy): a. Reduce inactivity b. Improve air quality c. Limit the city's contribution to climate change d. Develop attractive local environments e. Reconnect local communities Sustrans welcome LVRPA's recognition of the many health and wellbeing benefits provided by increased physical activity (3.29). 'Healthy Streets for London' (2017) informs us that if all Londoners walked or cycled for 20 minutes a day, this would save £1.7 billion in NHS treatment costs over 25 years. The Mayor's Transport strategy identifies that increased active travel would 'deliver at least an additional 60,000 years of healthy life in prevented illness and early death each year'. As the Strategic Planning document pertains, LVRP is 'the largest concentration of publically accessible open space in the region' (3.3), covering over 4000 hectares. This combined with the many leisure activities LVRP offers, makes it an existing hub of physical activity and provides further opportunity to offer a place for communities to walk and cycle, provided that infrastructure and accessibility are up to standard.	Comments noted and welcomed	No change
P GI 37.0	Save Lea Marshes Individual	SP			I have read the Lee Valley Regional Park Draft Strategic Planning Policies. It contains many sentiments we support. However, we cannot endorse this document: sentiments are not strategies. You do not tell us what you actually plan to do.	Comments noted	No change

