 <p>LEE VALLEY REGIONAL PARK AUTHORITY</p> <p>REGENERATION AND PLANNING COMMITTEE</p> <p>14 DECEMBER 2017 AT 12:30</p>	<p>Agenda Item No:</p> <p>6</p> <p>Report No:</p> <p>RP/09/17</p>
--	---

**BROXBOURNE PRE SUBMISSION LOCAL PLAN
REGULATION 19 CONSULTATION DOCUMENT**

Presented by the Head of Planning and Strategic Partnerships

SUMMARY

Broxbourne Borough Council is consulting on its Pre-Submission Local Plan which sets out proposals for growth and development within the Borough over the next 15 years.

The Authority has responded to each consultation stage in the preparation of the Local Plan and officers have met regularly to discuss key sites and issues of concern. The comments in the letter attached at Appendix A to this report are the Authority's final representations and take on board any changes made. These will be considered alongside the published plan when it is submitted for examination – programmed for March 2018. The Planning and Compulsory Purchase Act 2004 (as amended) (PCPA) states that the purpose of the examination is to consider whether the Plan complies with the legal requirements, the duty to co-operate and is 'sound'.

The Authority's comments are set out in the letter attached as Appendix A to this report. Most of the Authority's previous concerns have been addressed to some degree and the relevant policies amended. One objection remains in respect of the Borough's draft policy seeking the creation of a Gypsy and Traveller site on one part of the Wharf Road site involving land swaps to create a consolidated site which will be in the first instance focused on those plots where lawful development certificates have already been issued. Officers consider that an objection can be made on the grounds that the proposed use does not comply with the Authority's adopted proposals and is undeliverable. Whilst the Authority does sometimes consider the use of areas of the Regional Park for non-Park related uses in line with its adopted Land and Property Strategy this is only where there is some tangible gain to the wider Park. The deliverability of this proposal has to be questioned given that it will rely on individuals within the Gypsy and Traveller community who may change as the proposal progresses. It is unlikely to rid the Authority of the habitual problem of trespass and infringement.

Minor amendments are also sought to Policy CH1 Cheshunt Lakeside. These take account of the findings of the Habitat Regulations Appropriate Assessment.

RECOMMENDATION

- Members Approve: (1) the comments as set out in Appendix A to this report as the Authority's formal response to the consultation by Broxbourne Borough Council on the Pre-Submission Local Plan.

BACKGROUND

- 1 Broxbourne Borough Council is consulting on the Pre-Submission version of its Local Plan with policies to guide the nature and form of development through to 2033. The draft policies include a development strategy, place-specific policies, infrastructure and planning obligations, and development management policies. A Local Plan Policies Map accompanies the Plan. This Plan together with a Consultation Statement and summary of all the issues raised will be submitted to the Planning Inspectorate by the end of March 2018 for Examination.
- 2 Figures for population growth and housing numbers have been updated since the previous consultation draft and now show that there will be an increase in the population of c. 115,000 by 2033, and that there is a need for 7,718 new homes, approximately 454 per annum and that provision should be made for in excess of 6,500 new jobs. Consultation drafts of the Council's Walking and Cycling Strategy and Transport Strategy have also now been produced although the Local Plan includes the main priorities from both.
- 3 Over 10% (429ha) of the Park lies within the Borough of Broxbourne; this includes key sites and visitor attractions including Lee Valley White Water Centre, part of the River Lee Country Park, Turnford and Cheshunt SSSI, Silvermeade and Broxbourne Old Mill and Meadows. Please refer to the Plan at Appendix B to this report which shows the area of the Park within Broxbourne.
- 4 The Authority's adopted Park Plan (2000) includes strategic and local policies; these are still relevant to this part of the Regional Park pending their replacement by the area proposals included in the draft Park Development Framework (PDF) Area Proposals. Officers from both the Authority and the Borough Council have met regularly to consider how the Local Plan might best support the Authority's ambitions.
- 5 In September 2016 the Authority responded in some detail to the Regulation 18 draft Local Plan consultation (paper ULV/113/16). Whilst supportive of a number of policies including site specific policies relating to the Park a number of amendments were sought and two objections were raised. The amendments sought were as follows:
 - revisions to Policy LV1 Lee Valley Regional Park and supporting text to reference the Authority's statutory duties in relation to the development of the Park, including a reference to the Regional Park as a Strategic Cultural Area – text was supplied;
 - revisions to update policy text LV2 on Lee Valley White Water Centre (LVWWC);
 - recognition under LV3 Broxbourne Leisure Pool site that there is scope for housing development on this site given it was previously identified as a 'major development site' in the Green Belt;
 - revisions to policy for Spitalbrook LV4 to reflect PDF Area proposals for

- the site and the Spitalbrook Environmental Strategy/masterplan;
- amendment to policy HOD2 Turnford Surfacing to allow for revisions to the existing development brief to achieve a mixed use scheme which achieves visitor, environmental and ecological benefits for the Park;
- amendments to supporting text under transport infrastructure policies relating to Crossrail2 and four tracking to ensure access to the Regional Park along its western boundary is maintained and that new roads are not created within the Park to mitigate for closed level crossings;
- concern was raised about proposals for new walking and cycling routes within sensitive areas of the Park (Lee Valley SPA sites) on the east side of the West Anglia Railway under Policy INF8 North to South Paths; and
- minor amendment to supporting text under natural environment and biodiversity policy to include a reference to the Lea Catchment Nature Improvement Area (NIA).

6 The Authority's objections were made in relation to:

- Policy GT1 Gypsy and Traveller Sites bullet point 4 and the policy map designation GT1 which sought to establish an authorised Gypsy and Traveller site at Wharf Road in the Regional Park on Green Belt land. This was not considered to be a viable solution, rather it would undermine implementation of the Wharf Road Environmental Strategy and proposals to start managing and enhancing parts of Wharf Road area as part of the River Lee Country Park. The Authority considered it to be 'unsound' and sought removal of the policy from the Plan;
- Policy H7 Residential Moorings which sets out criteria for determining applications for residential moorings. Given the entire length of the River Lee and Navigation within Broxbourne lie within the Park and already cater for visitor and leisure moorings as well as a range of water based recreation. Permanent residential moorings with the associated service provision and access requirements are not considered appropriate within the Park.

HABITAT REGULATIONS ASSESSMENT

- 7 A Habitat Regulations Assessment (HRA) of the draft Local Plan was commissioned by Broxbourne Council. The HRA Screening Report (December 2016) concluded that a Likely Significant Effect (LSE) on the Lee Valley SPA as a result of public access and associated disturbances could not be objectively ruled out. Estimated population increases in the Borough, in particular the 1,900 dwellings proposed for the Delamare Road redevelopment (now revised to 1,750 new homes), which is within 400m of the SPA (immediately north of Cheshunt station) is likely to lead to significantly more visitors and pet dogs (the report gives an estimate of potentially 500 new pet dogs!) being walked within an area of the Lee Valley SPA that overlaps with Turnford and Cheshunt Gravel Pits SSSI. This will impact on the qualifying features of the SPA causing disturbance to the northern shoveler, great bittern and gadwall populations and habitats which could potentially be very damaging.
- 8 An Appropriate Assessment (AA) was carried out (report dated September 2017) to consider this LSE on the Lee Valley SPA. It concluded that to ensure the conservation objectives of the Lee Valley SPA are not undermined by the Local Plan a suitable mitigation strategy should be adopted by the Council. This

has been drafted by the consultants and forms part of the AA report. The key strands of this strategy are as follows:

1. visitor surveys, ecological surveys and post-development monitoring – to gather baseline data on how the SPA is currently used by visitors and birds with regular monitoring and reporting in order to establish the impacts of the development in the Local Plan;
 2. ensuring residents of the Borough have adequate access to dog walking locations – this is to ensure biodiversity assets are not relied upon for recreational green space use;
 3. establish new island and reedbed habitat – this requires the creation of new habitat to support the qualifying features of the SPA within the Regional Park; and
 4. minimising adverse impacts of visitors and dogs at the SPA – largely relates to new signage at important bird areas to tell people they are entering an important bird area and encourage owners to prevent their dogs from running off designated footpaths etc.
- 9 The report anticipates that the Borough will commit to a cooperative approach, working with Natural England and LVRPA to ensure that through the application of this mitigation strategy the conservation objectives of the SPA will not be undermined. Contingent upon the adoption of the mitigation measures the report concludes that an LSE on the SPA caused by development proposed in the Local Plan can be objectively ruled out.

REPRESENTATIONS ON THE PRE-SUBMISSION LOCAL PLAN

- 10 The Authority's representations as attached in the letter at Appendix A to this report focus on the above areas of concern and any changes made by Broxbourne to address these comments. This report highlights the main points focusing on policy for the Regional Park, Cheshunt Lakeside, Gypsy and Travellers, and residential moorings.
- 11 **Lee Valley Regional Park**
Changes made to supporting text in this section of the Local Plan help to address some of the Authority's comments. In terms of Policy LV1 'Lee Valley Regional Park' and its supporting text however, it is still considered important to make a reference to the PDF in relation to the Local Plan particularly as PDF Area Proposals for the Park within Broxbourne are programmed to be adopted by summer 2018. Additional text is suggested as part of an existing amendment to cover the requirement under Section 14 of the Lee Valley Regional Park Act 1966 for Park Authority Plan of Proposals to be included in riparian authority plans and strategies.
- 12 There has been no change to the LVWWC Policy LV2, as the Council consider there is more work to be done to develop the concept for the Centre as a 'major family leisure destination' with 'diversification into extreme sports'. The Authority will be commissioning a masterplan which it is intended will be developed in collaboration with the Council for the LVWWC site in the New Year and it is anticipated that this will address the Council's concerns about the level of detail and planning. Assurances are sought however that the Policy LV2 is sufficiently robust to enable future investment at this site to enable the scale of

development and activity envisaged.

- 13 The changes made to LV3 'Broxbourne Leisure Pool Site' and LV4 'Spitalbrook' are supported. These have clarified the position regarding enabling development and the need for environmental improvements. .
- 14 **Cheshunt Lakeside (Delamare Road)**
The Authority did not originally comment on Policy CH1 'Cheshunt Lakeside', but has since been involved due to the findings of the Habitats Regulations Assessment of the Local Plan and early stage discussions with developers of the site, Natural England and the Council regarding the potential impact of the development on the Lee Valley SPA and the Park.
- 15 The AA sets out a four stage mitigation strategy to overcome the LSE which arises as a result of increased public access and associated disturbances, particularly from pet dogs being walked within an area of the Lee Valley SPA that overlaps with Turnford and Cheshunt Gravel Pits SSSI.
- 16 The changes to Policy CH1, and the statement that the Council will work in partnership with Natural England, the Park Authority and developers to "*agree a range of measures aimed at mitigating the effect of the development on the qualifying interests of the Lee Valley Special Protection Area*" is welcomed and supported. Additional policy text should be added to ensure mitigation measures are fully monitored over time to enable re-evaluation of the scheme and amendments over time to ensure that it meets the required objectives.
- 17 The detail in the four stage mitigation strategy set out in the AA provides a useful starting point for identifying the necessary mitigation measures but it also raises a number of detailed issues for the Authority that require further discussion with the consultants, the Council and Natural England.
- 18 The detail of the mitigation in the strategy has been based on limited data, so it is unclear as to how the measures proposed will mitigate impacts. Until a comprehensive evidence base is available that shows how the SPA is used by visitors and birds and the implications of possible interventions are fully understood, (for example flooding issues, the ecological unit exists across the borough boundary) it would be premature for the Council to adopt the Mitigation Strategy in the AA report.
- 19 The commitment given in the policy and the reference in supporting text that development will need to provide sufficient mitigation in line with the mitigation hierarchy set out under Policy NEB1 'General Strategy for Biodiversity' is considered appropriate. As the supporting text states, the project level appropriate assessment (which officers have also been consulted on) will enable more detailed information to be collected to inform suitable mitigation measures. The Authority will be commenting separately in detail on the AA and will liaise further with Natural England and the Council.
- 20 There is however a need for one other amendment to Policy CH1. The AA identifies dog walking as a significant issue in terms of the LSE on the Lee Valley SPA, Policy CH1 should also include a requirement that the development provides dedicated open space for dog walking in addition to the requirement for landscaped open space. These matters are set out in the amended policy in the attached letter at Appendix A to this report.

21 Gypsy and Traveller Sites Wharf Road

The Council has advised the Authority that the Wharf Road site is becoming increasingly lawful and that therefore the establishment of a permanent site is the only practicable way forward. In the absence of any agreement with the Authority to this end, current and future needs will be met through lawful development certificates, planning permissions and caravan site licences. Officers and Members from both the Council and the Park Authority have met to discuss this and these discussions are ongoing.

22 The Policies Map retains the notation for a Gypsy and Traveller Site at Wharf Road and Policy GT1 Gypsy and Traveller Sites bullet point 4 states the Council will work with the travelling community to allocate sites including an "Authorised site at Wharf Road to accommodate c.20 pitches in total".

23 In support of this position further information has been received from the Council's team which includes a series of maps identifying the extent of plots which either have a lawful use for Gypsy and Traveller use (12) with a further 5 unlawful having been present for less than 10 years or still occupying the plot following expiry of a planning permission. The policy still seeks to consolidate plots to create a single site which would be 'self-managed with the Council's assistance' and that if the Authority agrees to this then a joint approach should be made to the traveller community. A series of plans are included in Appendix E to this report which have recently been received from the Council indicating the latest position and how the policy could be delivered. Council officers have recently indicated that that it could support delivery by working with the Authority on service connections, drainage, road surfacing and on site facilities although the issue of land transfers would be up to the Authority and service connections would have to be secured in negotiation with the statutory undertakers. The officer indicated that as yet nothing has been costed and the speed of delivery will be dependent on grants, the Council's 'very limited' funds and the travellers themselves.

24 Officers consider that an objection can be made to this proposal on the grounds that the proposed use does not comply with the Authority's statutory purpose or adopted proposals. Whilst the Authority does sometimes consider the use of areas of the Regional Park for non-Park related uses in line with its adopted Land and Property Strategy this is only where there is some tangible gain to the wider Park. It is considered unlikely that any such gain would arise from this proposal given the need to harness a commitment from the individuals within the Traveller community who may well change. Further, retention of the site in this location could result in further disturbance in the light of impact of the Cross Rail 2 scheme which at some point could require a new road bridge. If the Committee support the view that the land swap would be unworkable the policy is 'unsound'.

25 Residential Moorings

In response to the Authority's objection to Policy H7 'Residential Moorings' the Council has changed the policy – H8 'Permanent Residential Moorings' now states that "Applications for permanent residential moorings within the Lee Valley Regional Park will be resisted". The Council's Consultation Responses' report October 2017 recognises that given "the increasing pressure for housing, demand for residential moorings is likely to increase. Permanent residential moorings can adversely affect the River Lee environment. They also reduce the opportunities for water based recreation such as canoeing, visitor moorings, rowing and the possibility of a water taxi service". This change is welcomed and

supported in the attached comments.

26 Transport and Rail Infrastructure

Amendments have been made to supporting text to highlight the need to maintain access to the Lee Valley Regional Park for residents and visitors, under Policy INF6 'Level Crossings' and to highlight access opportunities to the Park arising from a potential new station at Turnford, Policy INF5 'Rail Stations'. Additional text should be added to reference the sensitive nature of this location in respect of the designated SPA and the need to minimise disturbance to its ecology.

- 27 The Draft Local Cycling and Walking Infrastructure Plan, September 2017, issued as part of the Local Plan consultation includes an Action Plan which identifies projects for cycle and walking path improvements within the Park. The reference to the Authority's recently adopted Cycling Strategy is welcome and it is noted that the Action Plan states that cycle and walking improvement projects will need to be agreed with the Authority.

ENVIRONMENTAL IMPLICATIONS

- 28 There are no environmental implications arising directly from the recommendations in this report but the draft Local Plan for Broxbourne once adopted will contain policies that guide and control development and the use of land within the borough that could have an impact on the protection, enhancement and development of the Regional Park.

FINANCIAL IMPLICATIONS

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

HUMAN RESOURCE IMPLICATIONS

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

LEGAL IMPLICATIONS

- 31 Planning applications referred to this Authority are submitted under the consultative arrangements of Section 14 (4-7) of the Lee Valley Regional Park Act 1966 (the Park Act). The Park Act requires a local planning authority to consult with the Authority on any planning application for development, whether within the designated area of the Park or not, which might affect any part of the Park.
- 32 The Park Act enables the Authority to make representations to the local planning authority which they shall take into account when determining the planning application.

RISK MANAGEMENT IMPLICATIONS

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

EQUALITY IMPLICATIONS

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

Author: Claire Martin 01992 709885 cmartin@leevalleypark.org.uk

BACKGROUND REPORTS

The Broxbourne Local Plan A Framework for the Future Development of the Borough Regulation 19 Consultation Document	November-December 2017
Habitats Regulations Assessment of the Broxbourne Emerging Local Plan	September 2017
Draft Local Cycling and Walking Infrastructure Plan Transport Infrastructure Plan	September 2017

PREVIOUS COMMITTEE REPORTS

ULV Regen & Planning Committee	ULV/113/16	Planning Consultation by the Borough of Broxbourne on Regulation 18 Draft Local Plan	22 Sept 2016
ULV Regen & Planning Committee	ULV/104/15	Planning Consultation by the Borough of Broxbourne on Duty to Cooperate Framework	17 Dec 2015
ULV Regen & Planning Committee	ULV/50/11	Consultation from Broxbourne Borough Council on a draft development brief for the site of Turnford Surfacing, Hoddesdon	24 Feb 2011

APPENDICES ATTACHED

Appendix A	The Authority's draft response to Broxbourne Borough Council
Appendix B	Plan showing the Park area within the borough of Broxbourne
Appendix C	Proposed Wharf Road Gypsy Traveller Site
Appendix D	Wharf Road land ownership
Appendix E	Initial draft Council proposals

LIST OF ABBREVIATIONS

PDF	Park Development Framework
SSSI	Site of Special Scientific Interest
NIA	Nature Improvement Area
HRA	Habitat Regulations Assessment
AA	Appropriate Assessment
LSE	Likely Significant Effect
SPA	Special Protection Area
the Park Act	Lee Valley Regional Park Act 1966
LVRPA	Lee Valley Regional Park Authority



Douglas Cooper
Head of Planning
Planning Policy Team
Broxbourne Council
Bishops' College
Churchgate
Cheshunt
EN8 9XQ

Email: swilkinson@leevalleypark.org.uk
Direct Dial: 01992 709885

16th December 2017

Dear Douglas

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

Thank you for consulting the Regional Park Authority on the Draft Local Plan Regulation 19 consultation document.

A report on this matter was considered by the Authority's members at the Lee Valley Regeneration and Planning Committee on the 14 December 2017 when the following comments were agreed. These are focused on the degree to which amendments to the Plan have addressed those areas of concern raised during the previous consultation and whether the Plan can be considered 'sound'.

Places

Lee Valley Regional Park

The Authority made a number of detailed comments on both supporting text and policy under this section of the Plan. The proposed changes to supporting text are welcomed particularly where additional reference is made to the Authority's statutory duties. The Council has decided not to include a policy reference to the Park Development Framework (PDF) under Policy LV1 Lee Valley Regional Park. This is in part understandable, given the sections of the PDF relating to Broxbourne are still at the consultation draft stage; although it is likely these will be finalised just as the Local Plan is being examined.

In order to clarify the position with regards to the PDF the following text should be included – this could be added to text under paragraph 13.4 or form part of

the footnote that the Council has added under policy LV1 as part of its revisions as follows (amendments in red): –

Footnote 2 The Lee Valley Regional Park Authority is a statutory authority created by the Lee Valley Regional Park Act 1966 (the Park Act). Section 14 of the Park Act sets out 'special provisions' with regard to planning, including the right to be consulted by riparian local planning authorities, and for the Authority's plan of proposals for the future development and use of the Park – the Park Development Framework to be included in the riparian plans and strategies as relevant.

Lee Valley White Water Centre

It is noted that no change has been made to Policy LV2 Lee Valley White Water Centre (LVWWC). The Authority sought to update the policy description to encapsulate the future vision for the Centre as "the major family leisure destination in the south east" (instead of 'development of an adrenaline hub') and its "diversification into extreme sports". These terms have instead been added to supporting text (para 13.6) as a description of the Authority's aspirations for the site. The Council have stated in their 'Consultation Responses' report October 2017 and in the supporting text that the Authority's position on this is at an early stage with a considerable amount of work needed before anything other than outline support can be offered.

As the Council is aware a number of family orientated leisure activities have taken place at the LVWWC over the last year together with investment to upgrade facilities for visitors. In the New Year the Authority will be commissioning a masterplan to resolve a range of issues through joint work with the Council. The Authority therefore seeks assurance from the Council that the policy LV2 Lee Valley White Water Centre is sufficiently robust to enable future investment at this flagship leisure attraction.

Broxbourne Leisure Pool

Amendments to Policy LV3 Broxbourne Leisure Pool Site are supported. Text now clarifies that the Council and the Authority will update the development brief for the site "to include the potential for residential development to the **western end of the site** to enable the wider development and improvement of the site **and preservation of the existing parkland and natural areas**".

It is noted that supporting text for Policy BX2 Broxbourne Station and Environs now also makes reference to the Leisure Pool site and Spitalbrook. It would be helpful if this text could also indicate how the relationship and timing of 'the long term development plan for Broxbourne Station and environs' (as supported by Policy BX2) will relate to work on updating the development brief for the Leisure Pool site.

Spitalbrook

The Authority notes and supports the amendments made to LV4 Spitalbrook in response to the Authority's comments. This has been expanded to make

reference to the need for environmental improvements and habitat restoration, improved public access and leisure and recreational facilities including a visitor hub. However reference to some enabling development to support these improvements is required.

Turnford Surfacing

The Authority welcomes the Council's commitment under Policy HOD2 Turnford Surfacing Site to revisit and update the development brief. The Authority's comments on this policy considered revisions were necessary to achieve a mixed use scheme which would also achieve visitor, environmental and ecological benefits for the Park. The Authority also supports the comments made by Historic England that any development should take account of the close proximity of the grade I listed Rye House gatehouse and other listed structures which form part of the Rye House moated enclosure and gatehouse scheduled monument. This could be accommodated in a revised brief.

One minor amendment is needed as follows:

Policy HOD2 Turnford Surfacing Site

The Council seeks the redevelopment of the Turnford Surfacing site in accordance **with** an updated Development Brief.

Cheshunt Lakeside (Delamare Road)

The Authority notes and supports the changes to Policy CH1 Cheshunt Lakeside in particular the policy commitment to work with Natural England, the Park Authority and developers to "agree a range of measures aimed at mitigating the effect of the development on the qualifying interests of the Lee Valley Special Protection Area".

The AA found that a likely significant effect (LSE) caused by the Local Plan on the Lee Valley SPA could not be objectively ruled out unless a suitable mitigation strategy is developed in consultation with the Council, Natural England and the LVRPA and the Council then commits to and adopts the mitigation strategy. The LSE is due largely to the quantum of development at Cheshunt Lakeside and its proximity to the Lee Valley SPA which overlaps with Turnford and Cheshunt Pits within the River Lee Country Park.

Supporting text that refers to the mitigation hierarchy under Policy NEB1 General Strategy for Biodiversity is also welcome. As stated in paragraph 7.8 the project level assessment will enable the collection of more detailed evidence from which to plan mitigation and the Authority should be involved in this process.

Notwithstanding its support the Authority does seek two amendments to the Policy CH1.

The policy lists the various elements of the future Cheshunt Lakeside development and 'landscaped open space' is included in the list. Given that

the AA identifies dog walking as a significant issue in terms of the LSE on the Lee Valley SPA the policy should be amended to include a requirement for dedicated open space for dog walking within the scheme as part of any future mixed use development.

The policy reference to a range of mitigation measures should also make specific mention of the need for a robust monitoring process. This will enable a process of re-evaluation and adjustment over time given that proposals for Cheshunt Lakeside anticipate a significant lead in time with building work phased over a period from 2020 to 2028. The Authority's amendments to policy are set out below.

Policy CH1 Cheshunt Lakeside

Cheshunt Lakeside will be developed as a new mixed use urban village to accommodate:

1. c. 1,750 new homes;
2. 40% affordable homes;
3. Buildings limited to a maximum of 8 storeys in height;
4. Elderly persons' accommodation;
5. Businesses and business floorspace for new business start-ups;
6. A local centre, situated along Windmill Lane, connecting Cheshunt Lakeside to Cheshunt Railway Station;
7. A two form of entry primary school;
8. Landscaped open space, **included dedicated areas for dog walking;** and
9. Relocation of Network Rail depot.

A section 106 agreement will accompany a future planning permission and proportionate contributions will be allocated to priorities within the Infrastructure Delivery Plan and should be the means by which mitigation measures are delivered..

Cheshunt Lakeside is to be developed in accordance with a comprehensive master plan. Incremental development of the area will be resisted.

The Council will work in partnership with Natural England, the Lee Valley Regional Park Authority and the developers of Cheshunt Lakeside to agree a range of measures aimed at mitigating the effect of the development on the qualifying interests of the Lee Valley Special Protection Area. **This mitigation plan should include a robust monitoring schedule which will allow for re-evaluation and amendments to the scheme to ensure that it meets the required objectives.**

If necessary, compulsory purchase will be pursued by the Council.

Gypsy and Traveller Sites Wharf Road

The Council have advised the Park Authority that the establishment of a permanent gypsy and traveller site at Wharf Road is the only practicable way forward and that in the absence of any agreement with the LVRPA to this end, current and future needs will be met through lawful development certificates, planning permissions and caravan site licences at Wharf Road.

Whilst the Council's suggested proposals represents a 'planned' way forward it is in practice unworkable given that the consolidation of the plots does not comply with the Authority's statutory purpose. Further, implementation would depend on individuals within the Traveller community whose commitment for understandable personal reasons may change. It would appear from the Council that only 'limited resources' would be available and the Authority has no resources budgeted for this. Finally, it could lead to additional pressures from the Cross Rail 2 proposals which could further erode the character of the Regional Park in this location. For these reasons the proposals is 'unsound'.

Transport Infrastructure and Delivery

Under Policy INF5 Rail Stations, Turnford is identified as the location for a new station and its indicative location is shown on the Policies Map; adjacent to the Lee Valley SPA and River Lee Country Park. Supporting text has been amended to highlight the access opportunities this might bring for the Park. It should also reference the sensitive nature of this location in respect of the designated SPA and the need to minimise disturbance to its ecology.

Supporting text in relation to Level Crossing Closures has been amended and now states "The Council is working with Network Rail to ensure continued access to the Lee Valley Regional Park for residents and visitors."

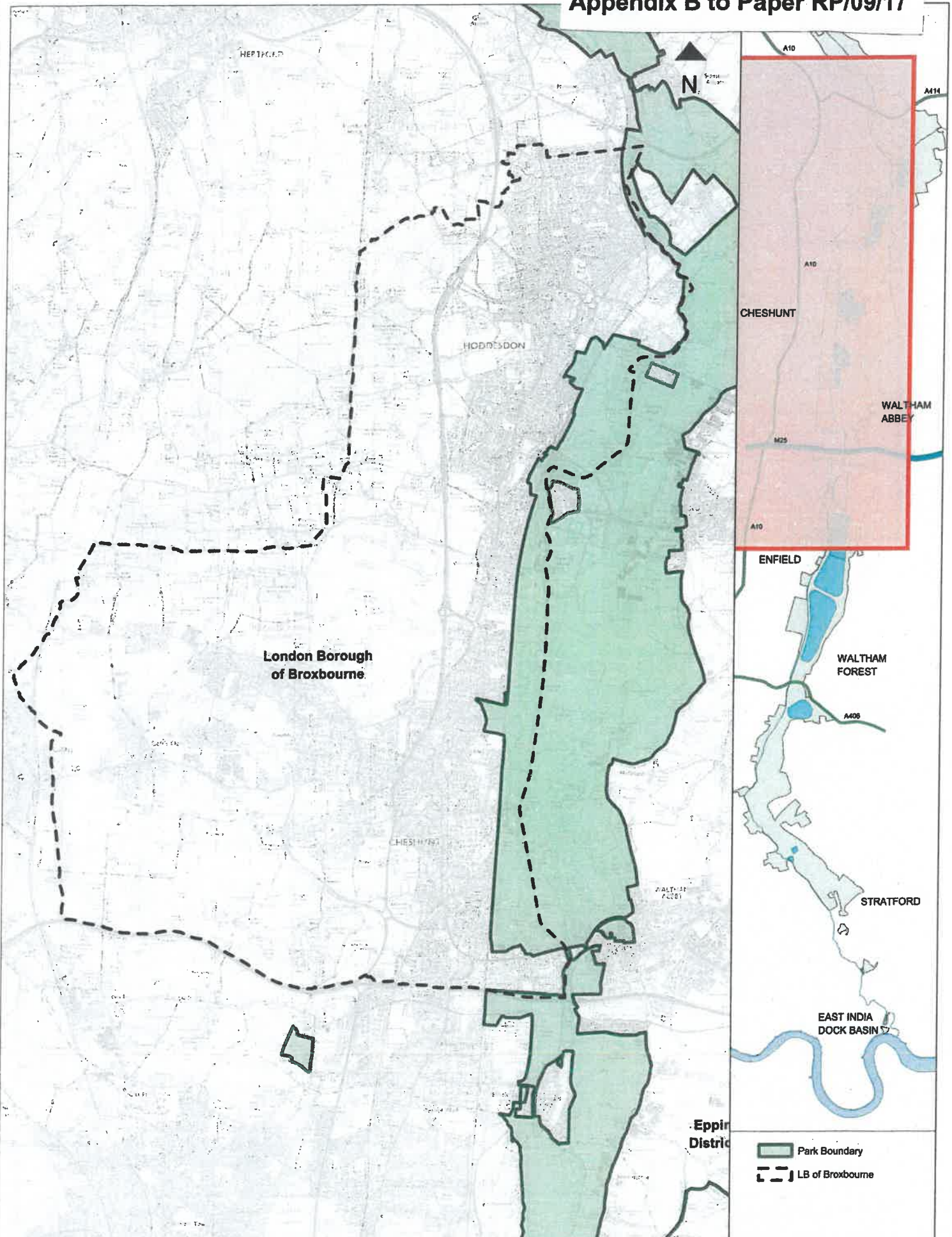
The Authority previously commented on Policy INF8 North to South Paths and the appropriateness of the proposal for a new walking and cycling route along the east side of the West Anglia Railway i.e. within the Park, where as this lies within the River Lee Country Park, many routes already exist. This policy has been deleted due to the preparation of a Draft Local Cycling and Walking Infrastructure Plan Sept 2017. This includes an Action Plan which identifies projects for cycle and walking path improvements within the Park, refers to the Authority's recently adopted cycle strategy and notes projects will need to be agreed with the Authority. This approach is welcomed.

Residential Moorings

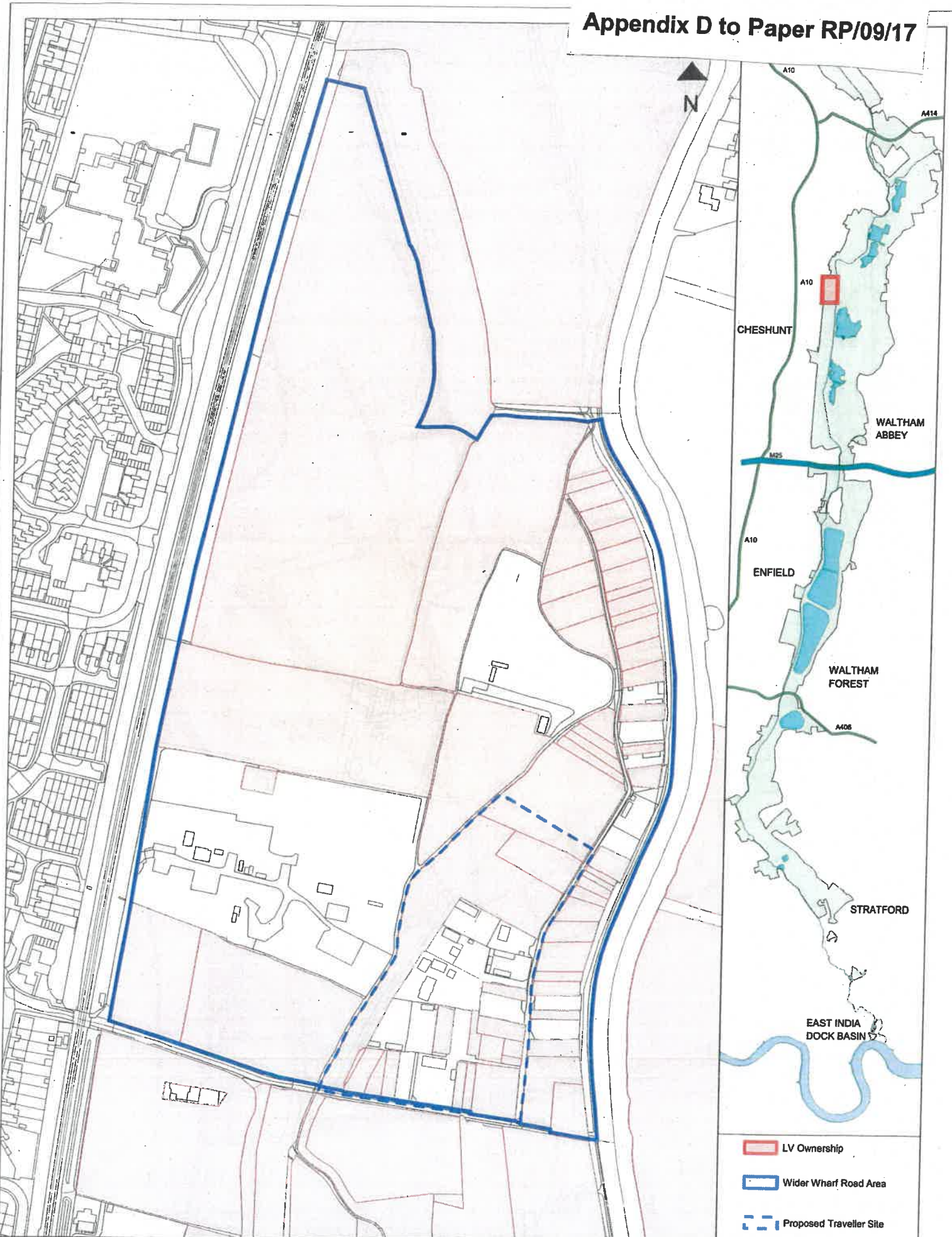
The Authority supports and endorses the change made to Policy H7 Residential Moorings which now under Policy H8 'Permanent Residential Moorings' states that applications for permanent residential moorings within the Lee Valley Regional Park will be resisted.

Yours sincerely

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







- LV Ownership
- Wider Wharf Road Area
- Proposed Traveller Site

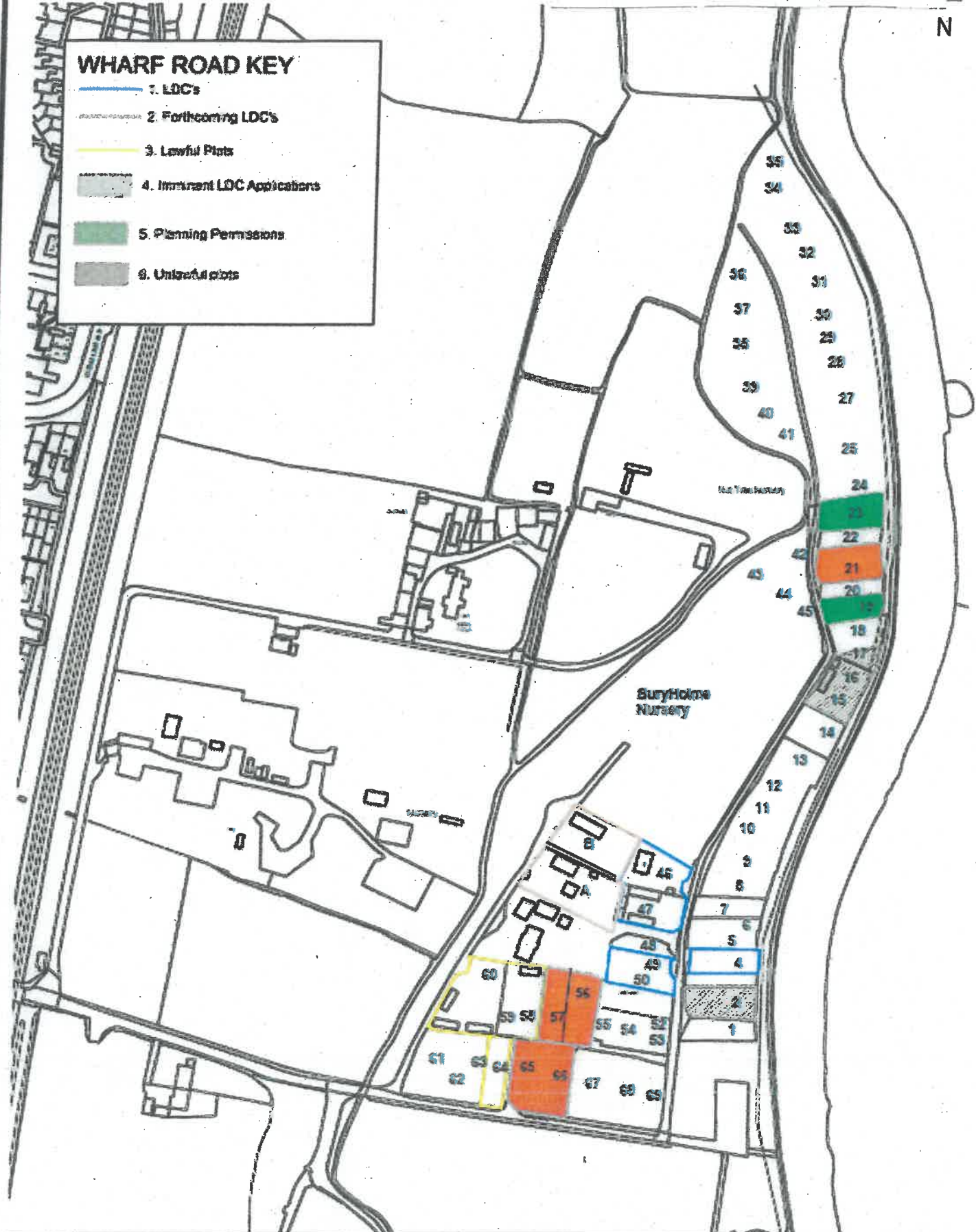
Wharf Road Land Ownership

17

N

WHARF ROAD KEY

- 1. LDC's
- 2. Forthcoming LDC's
- 3. Lawful Plots
- 4. Imminent LDC Applications
- 5. Planning Permissions
- 6. Unlawful plots



BROXBORNE BOROUGH COUNCIL
 CHURCHGATE
 CHESHUNT
 HERTS
 EN8 9QX

LOCATION: WHARF ROAD, WORMLEY

USER: SB/DC DATE 14/11/17

Reproduced from the 1826 Ordnance Survey Mapping
 With the permission of the controller of Her Majesty's Stationery
 Office © Crown Copyright. Unauthorised reproduction infringes
 Crown Copyright and may lead to prosecution or civil proceedings.

SCALE: 1:2250



Land Use
1:2500 @ A4








-  Existing owned pitch
-  New permanent pitch
-  Visitor pitch
-  Shared amenity block
-  Play space / open amenity space
-  Open amenity space
-  Car park



Framework
1:2500 @ A4







-  Primary vehicular routes
-  Secondary vehicular routes
-  Pedestrian only routes
-  Green open space
-  Site centre and focal point



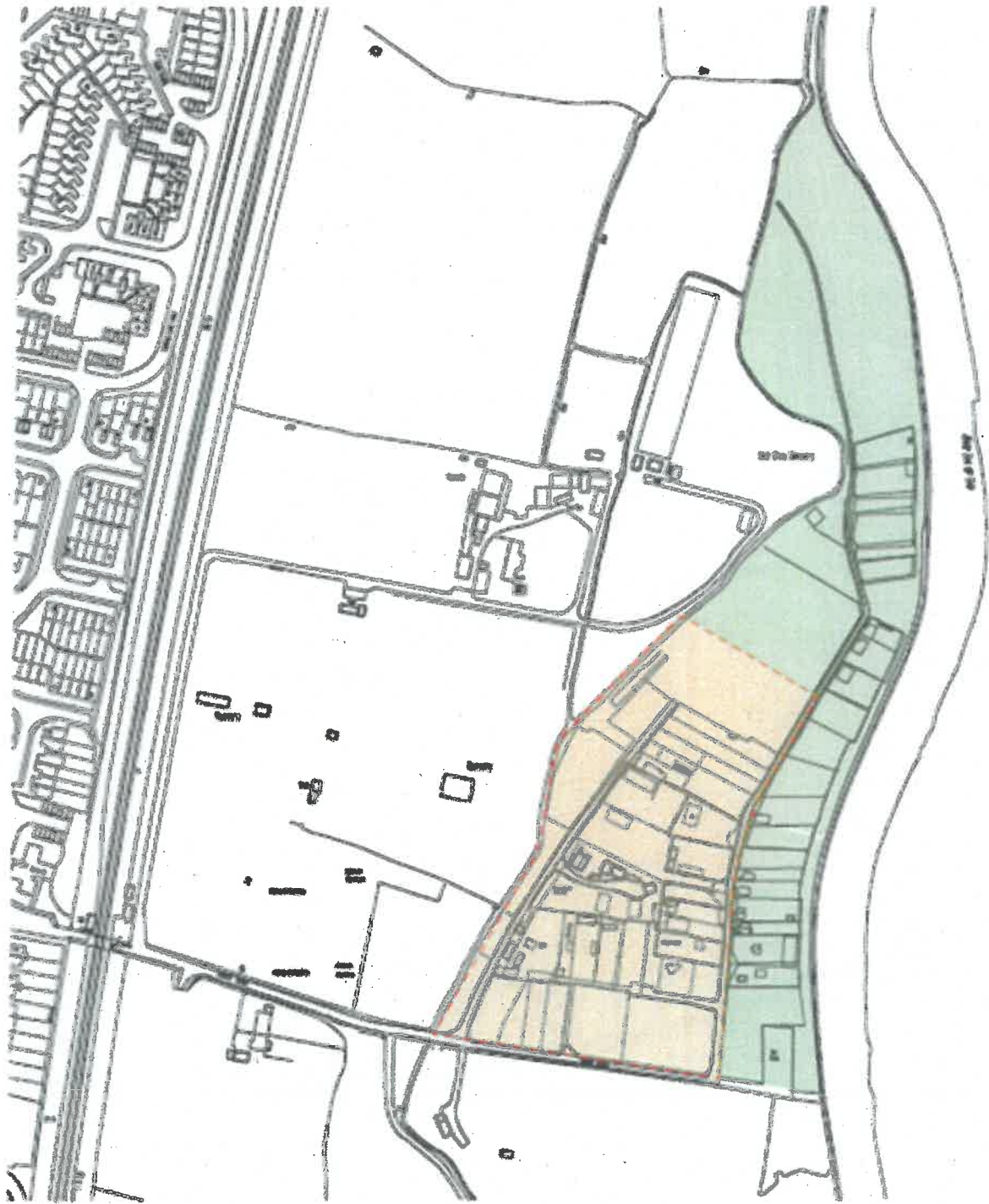
Services
1:2500 @ A4



-  Trunk network
-  Secondary network
-  Feeder lines
-  Service unit



Land Reorganization
1:2500 @ A4



Revised LVTPA land
Revised Transfer site status



LVRPA Masterplan Context

1:2500 @ A4



