

**LONDON BOROUGH OF WALTHAM FOREST LOCAL PLAN
SHAPING THE BOROUGH: PART 1 STRATEGIC POLICIES
PROPOSED SUBMISSION VERSION (REGULATION 19
CONSULTATION) & PART 2 SITE ALLOCATIONS
(REGULATION 18 CONSULTATION)**

Presented by the Head of Planning

SUMMARY

The London Borough of Waltham Forest are consulting on their draft Local Plan 2020-2035 'Shaping the Borough' which now appears in two parts. Part 1 Strategic Policies (LP1) has reached the Proposed Submission version stage (Regulation 19) whilst the Part 2 Site Allocations Development Plan Document is at the earlier Regulation 18 consultation stage.

The Authority responded to the previous stages of the Local Plan, both the Regulation 18 Local Plan consultation and the accompanying 'call for sites', proposing two sites for consideration as residential; the Waterworks building and car park, and the western portion of the Ice Centre car park, all located with Metropolitan Open Land.

The Part 1 Local Plan now includes a policy supporting the Regional Park and the Park Development Framework and this is welcomed. However, amendments previously sought to strengthen policy support for the Park's major venues and visitor facilities within the growth areas in the southern part of the borough have not been included. Further representations are made in respect of this point in the letter included as Appendix A to this report. Designation of both the Lee Valley Ice Centre and the WaterWorks Centre and car park as leisure sites within the Local Plan are also sought. The report also considers the findings of the Council's Green Belt and Metropolitan Open Land assessment (2019) and proposes the realignment of the Metropolitan Open Land boundary so as to exclude the WaterWorks Centre and car park and questions whether, given the recent approved redevelopment proposals, the Lee Valley Ice Centre should remain within Metropolitan Open Land.

These points underpin the Authority's response to the Site Allocations document whereby it is proposed that both the Lee Valley Ice Centre and the WaterWorks Centre and car park are included as leisure based site allocations to support their long term future as leisure and cultural assets for the borough and wider Regional Park.

The Authority's final representations on the Submission Version Local Plan Part 1 Strategic Policies and comments on the Local Plan Part 2 Site Allocations Document are set out in the letter attached as Appendix A to this report.

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 the London Borough of Waltham Forest on Part 1 and Part 2 the draft Local Plan 2020 – 2035.

BACKGROUND

- 1 Following the consultation last year on the draft Local Plan (Reg. 18 version) the Council have decided to produce the Local Plan in two parts; Part 1 is the overarching strategic policy document and Part 2 is a new Site Allocations Development Plan Document (DPD). It is intended that together these Local Plan documents will promote, shape and manage growth in the London Borough of Waltham Forest (LBWF) for the next 15 years and seek to "achieve a balance between physical, social, economic and environmental protection in the Borough for the benefit of all residents and stakeholders".
- 2 The Authority is a key stakeholder in the Borough – a large area of the Regional Park (over 500ha) and several venues fall within the LBWF. It forms both a substantial green infrastructure resource and a major leisure and sporting attraction for the Borough's residents. This includes land alongside the eastern side of the King George's and William Girling Reservoirs, Banbury Reservoir and the adjoining Folly Lane Triangle, the eastern part of Tottenham Marshes, the Walthamstow Wetlands, Walthamstow Marsh, Leyton Marsh and the Lee Valley Ice Centre, Lee Valley Riding Centre and Waterworks Centre and the Lee Valley Hockey and Tennis Centre. A plan indicating the extent of land in the Regional Park and in the administrative boundary of the Borough is included in Appendix B to this report.
- 3 The Authority has adopted detailed proposals for those areas of the Regional Park which lie in the Borough through the Park Development Framework (PDF) Area Proposals. Five sets of Area Proposals are relevant given the extent of the Park in the borough: Area 2 The Three Marshes: Walthamstow, Leyton and Hackney; Area 3 The Waterlands: Walthamstow Wetlands to Tottenham Marshes; Area 4 The Waterlands: Banbury Reservoir to Picket's Lock; a small section of Area 5 The Waterlands: King George V Reservoir to Rammey Marsh; and Area 1 Proposals where these relate to the Queen Elizabeth Olympic Park.
- 4 The Authority's major investment project for the Lee Valley Ice Centre lies within the Borough. Proposals to redevelop the existing facility and create a new state-of-the-art twin-pad ice skating destination obtained planning permission in early October, and following approval by the Mayor of London and the signing of a Section 106 Agreement, a decision notice was issued on 20 November 2020. In the longer term the Lee Valley Hockey and Tennis Centre currently within the area administered by the London Legacy Development Corporation (LLDC) will revert back to the Borough.
- 5 The Authority responded in detail to the previous round of consultation on the

draft Local Plan (Paper RP/13/19) seeking recognition of the Authority's planning functions, and the Park's contribution to the Borough's leisure and recreation needs. The Authority also responded to the accompanying 'call for sites', proposing two sites for consideration; the Waterworks building and car park, and the western portion of the Lee Valley Ice Centre car park. Both these areas are within Metropolitan Open Land (MOL). It was understood all sites put forward were to be considered as part of the LBWF's Growth Capacity Study which was in process at the time of the 2019 consultation.

6 Green Belt & MOL review and Growth Capacity Study

At the time of the 2019 consultation a focused Green Belt (GB)/MOL review (November 2019), which included both the Waterworks building, car park, and open grassland behind and the Lee Valley Ice Centre building only, was also being undertaken by the Borough to provide a more detailed appraisal of these locations. It included an assessment of the 'harm' to the MOL designations should all or part of the land be developed.

- 7 It concluded for the Waterworks site that the potential harm to MOL resulting from the development of the whole site (as described above) would be moderate, but if only the Waterworks building and car park is considered then this would be classified as 'moderate low'.... *"The development of this smaller area of land is considered likely to result in moderate low harm to the remaining MOL as this area is more contained by urbanising development and has a less significant relationship with the wider MOL than the south eastern end of the area."* This smaller area corresponds with the site the Authority originally submitted as part of the Call for Site process.
- 8 In assessing the Lee Valley Ice Centre building the review found that although the impact of redeveloping the existing built footprint would have a minimal impact on the openness of MOL within the site, the harm to areas of MOL to the north and south was considered to be high. The review also stated that *"Due to the containment of the car park to the south west, the harm of redeveloping the area and the adjacent car park would not be significantly higher."* These findings have been superseded by events however given the Authority now has permission to redevelop the Lee Valley Ice Centre and implement considerable enhancements to the adjoining areas of open space (MOL).
- 9 The review also advised that the National Planning Policy Framework (NPPF) requires changes to the Green Belt to be made through the Local Plan process and that should the Council wish to pursue any of these alterations they would need to demonstrate exceptional circumstances, including consideration of the need to promote sustainable patterns of development. Policy in the draft London Plan suggests this position applies equally to MOL.
- 10 The review suggested the Council consider the development of appropriate guidance or masterplans for each development area, proposing that the sites within MOL along Lea Bridge Road could be considered together given their proximity.
- 11 Officers from the Authority attended a Duty to Co-operate meeting in December 2019 with representatives from the LBWF to discuss the Authority's comments and the possibility of future masterplan work for the Lea Bridge Road area. The Authority had sought a supportive policy approach as part of the Strategic Location designations that recognised leisure as a key component of the growth agenda. The draft Local Plan designated the Lea Bridge and Church Road

area as a Strategic Location; at that time both the Lee Valley Ice Centre and Lee Valley Riding Centre were shown to lie just outside this area whilst the WaterWorks Centre sat within it. Similarly, the Plan identified the Leyton Strategic location which included the Lee Valley Hockey & Tennis Centre.

- 12 However, following this meeting work on a masterplan for the Lea Bridge area was not progressed and has now been superseded to some degree by the permission granted recently for the redevelopment of the Lee Valley Ice Centre site together with the associated ecological and open space enhancements.
- 13 The Growth Capacity Study is now available as part of the Local Plan evidence base. It's assessment of the potential for new development within the Borough includes the consideration of the outcome of the Call for Sites, but it also states that areas within the Green Belt or MOL have been excluded. The assessment methodology followed a 'policy-off' approach in the early stages of the review to capture as many opportunities as possible, and to ensure a longer-term view of site potential, but did not include *"the boundaries of the Green Belt and Metropolitan Open Land, which defines the limit of the areas of search."* This means that the sites put forward by the Authority would have been discounted.
- 14 **Next Stages**
Following this consultation, the Proposed Submission version, together with any comments made, will be submitted for examination by an independent Planning Inspector. Comments on the Site Allocations document will be considered before a further iteration of the document is prepared for final consultation. The Council is aiming to adopt a new Local Plan by the summer of 2021 at which point it will replace the existing Core Strategy 2012, Development Management Policies Document (DMPD) 2013, and the Blackhorse Lane Area Action Plan 2015.
- 15 The following paragraphs focus on the extent to which the Authority's previous comments have been taken on board in the Proposed Submission version and any new policy issues or areas of concern, for example in relation to the Site Allocations document. It makes reference to the Council's Consultation Report produced earlier in the summer which details the Council/officer response to each comment made.

COMMENTS ON THE PROPOSED SUBMISSION LOCAL PLAN PART 1

16 Protecting and Enhancing the Environment

The Proposed Submission Local Plan Part 1 (LP1) now includes additional strategic objectives (nos. 12 and 13), which relate to the Borough's natural environment and give specific mention to the Lee Valley Regional Park and Epping Forest as follows:

"12. Protect, restore and enhance the Borough's natural environment to sustain biodiversity habitats and species of nature conservation importance.

13. Work with partners to protect and enhance the adjoining areas of regional, national and international importance in Epping Forest and the Lee Valley Regional Park."

The 'golden threads' highlighted as shaping the Local Plan now also include an additional element - "protecting and enhancing the natural environment". These

additions are to be welcomed; they strengthen the Council's Vision and policy direction on the natural environment and the Regional Park.

17 Lee Valley Regional Park Policy

The previous policy references to the Regional Park which sat within a joint policy with Epping Forest have been amended and are now set out in a separate **Policy 84 'The Lee Valley Regional Park'**. As requested by the Authority in its previous comments, the policy has been amended to include a policy statement supporting the PDF, as well as the detail in the supporting text. The PDF is to be a ***"material consideration in the determination of planning applications"***. These changes will be supported in representations.

18 Additional policy text has also been added to protect the Lee Valley Special Protection Area (SPA) and Ramsar in accordance with the Local Plan Habitat Regulations Assessment Appropriate Assessment. This found the potential for urbanising effects (principally effects from construction close to the Park, risk of fire, fly tipping/litter leading to the spread of invasive species and disease and cat predation) might impact the Lee Valley SPA and Ramsar.

19 Please refer to Appendix C to this report, which sets out the full text of Policy 84. These changes can be supported; minor editing is suggested in the letter attached at Appendix A to this report, to avoid repetition. Clarification is also sought regarding the Council's proposal to produce SPD guidance for mitigating the impact of development on the SAC/SPA and whether this will relate to the Lee Valley SPA.

20 Biodiversity

Policy 81 Biodiversity and Geodiversity has been amended and as per the comments made by the Authority, it is now framed with a positive opening statement which addresses all proposals, whether they impact upon biodiversity or not, requiring that these seek to protect and enhance biodiversity and geodiversity resources in the borough. Further amendments proposed to Policy 81 bullet D which relate to the above point have not been implemented, although the Consultation Report (June 2020) suggests the intention was to make the full change. The Authority's original point is therefore reiterated in the letter attached at Appendix A to this report.

21 Spatial Strategy and Strategic Locations

The scale of growth envisaged by the draft Local Plan has not changed significantly and remains divided into the three areas previously identified: South, Central and North Waltham Forest with the Strategic Locations and other Site Opportunity Areas identified as the primary locations for growth and supporting infrastructure now also presented graphically, please refer to Appendix D to this report which reproduces diagrams showing the whole borough and South Waltham Forest (Figs 4.1 and 4.2).

22 The Authority's previous comments highlighted the significance of the location of the Park's main venues either adjacent to or within the Strategic Locations seeking a more supportive policy approach to ensure leisure was acknowledged as part of the growth scenario. The Lee Valley Ice Centre, WaterWorks Centre and Lee Valley Riding Centre are now shown as lying within the Lea Bridge Strategic Location. The Leyton Strategic location abuts the Lee Valley Hockey & Tennis Centre, identified as part of the LLDC.

23 Policy for each of the strategic locations has been condensed in the Submission

Version, so for example one policy – Policy 9 South Waltham Forest now covers all the locations within that part of the borough. The Council have decided not to include the policy amendment suggested by the Authority which sought policy support for proposals which would improve and grow the visitor, sporting and wider cultural offer of the Regional Park and its venues within the south of the borough. Instead a reference to the venues has been added to the supporting text 5.15. Please refer to the letter at Appendix A to this report for the detail.

- 24 The lack of policy support is a serious concern and it is difficult to understand the Council's position. The Regional Park and its venues are a key asset to the southern part of the Borough, and indeed the wider Borough (the successful conclusion of the Lee Valley Ice Centre application has demonstrated the contribution a leisure/sporting venue makes to local communities across a range of cultural, well-being and health related matters) and should be specifically covered by policy. Policy 9 bullet point 1) refers to 'cultural and sporting assets in the South area' but only in terms of increasing the 'visitor economy and building a vibrant evening and night time offer'. A specific policy reference is still considered appropriate and the Authority's previous position on this point should be sustained. Please refer to the policy text included in the letter attached as Appendix A to this report.
- 25 **Call for Sites and MOL**
Under a separate but related process the Authority's response to the Council's Call For Sites exercise in 2017, suggested that two sites within the Lea Bridge Road area could be de-designated from MOL and considered for residential development; the Waterworks building and car park, and the western portion of the Lee Valley Ice Centre car park.
- 26 At that time the outcome of the Council's Green Belt/MOL review was seen as critical in this respect, as this would be the mechanism through which to identify any adjustments to Green Belt and MOL boundaries and to start a process for demonstrating that 'exceptional circumstances' exist to allow for change, in accordance with paragraphs 136 and 138 of the NPPF (2019). This review has now concluded and whilst it proposes minor boundary adjustments to existing Green Belt and MOL boundaries the Authority's sites remain within the MOL designation.
- 27 Within the Local Plan Proposed Submission Version, Green Belt and MOL policy remains largely unchanged (Policy 79 Green Infrastructure and the Natural Environment) and is focused on protecting Green Belt and MOL from inappropriate development and "delivering development and regeneration activity principally through the use of brownfield land and buildings". The previous reference to the Green Belt review and the possibility of exceptional circumstances being identified within areas such as Lea Bridge Road has been removed from the supporting text.
- 28 The draft Site Allocations document (see paragraph 35 below) has now been produced and forms Part 2 of the Local Plan. It does not include the Waterworks building and car park (or the western portion of the Lee Valley Ice Centre car park, which is now part of the area covered by the planning permission for the new Lee Valley Ice Centre). The Council have therefore decided not to remove these sites from MOL or make any site allocations as part of the Local Plan process.
- 29 The Waterworks site and car park and indeed the Lee Valley Ice Centre site are

now shown in the Local Plan Proposed Submission Version (Diagram Fig 4.2 please see Appendix D to this report) as lying within the Lea Bridge and Church Road Strategic Location. The Council state within supporting text that they intend to prepare area based Supplementary Planning Documents and/or masterplans for these areas to co-ordinate development. Once prepared these documents will have weight as material considerations in determining planning applications.

- 30 Key factors have changed for the Authority however since the 2017 Call For Sites and the previous draft Local Plan consultation. Permission has now been granted to redevelop the Lee Valley Ice Centre, which will include a range of ecological and environmental enhancements on the adjacent and associated land at Lea Bridge Road. Officers are now also considering the future of the Waterworks Centre and car park area in terms of its leisure, visitor and environmental contribution both in terms of its immediate location and in relation to the wider Regional Park. This work is based upon the PDF Area 2 Proposals which identify the site as part of the Lea Bridge Road Area major visitor hub (Proposals 2.A.6). Proposals include the "provision of visitor accommodation as part of the enhanced visitor offer at the Waterworks Centre..." with options that could include youth hostel style facilities, pods and/or chalets. Other relevant proposals include those seeking to promote the centre as a base for events, learning and volunteer related activity.
- 31 It is therefore necessary to make further representations to the Local Plan review process both in terms of the Part 1 Strategic Policies and the Part 2 Site Allocations document in respect of the above sites.
- 32 Within the Local Plan Part 1, it would now be appropriate for the Council to reconsider the policy position in relation to the Lee Valley Ice Centre, to recognise its current and future role in terms of ice sport, training and leisure activity and amend the Local Plan to reflect this. A leisure designation on the Policies Map, or specific reference under Policy 9 are suggested. Policy 36 Promoting Culture and Creativity seeks to support arts, culture, entertainment and visitor facilities and this might also be considered appropriate by the Council. Officers will seek to discuss this matter further with the LBWF officers. In addition, given the recently approved redevelopment proposals, there seems little reason for this land to stay within MOL designation as it now presents a significant anomaly combined with Essex Wharf in the west.
- 33 The Waterworks Centre and car park requires a similar treatment to recognise it as a leisure site suitable for visitor accommodation in line with the PDF proposals. Fundamental to securing a viable future leisure use and development of this site, in line with the PDF Proposals and the wider cultural offer of the borough, is its MOL designation. New leisure and visitor related uses on this site were not considered as part of the Call For Sites process.
- 34 Given these facts and the findings of the MOL review it is considered appropriate to seek a realignment of the MOL boundary in this area to remove the Waterworks Centre and car park, whilst also seeking a leisure designation and policy support as in the case of the Lee Valley Ice Centre. Whilst the Council recognises the need for future SPD/master planning for the Lea Bridge Strategic Location those would not be the mechanisms through which to alter the MOL boundaries. Both sites should also be recommended for a site allocation in the new Part 2 Local Plan document, please see below.

COMMENTS ON THE DRAFT SITE ALLOCATIONS LOCAL PLAN PART 2

- 35 The Site Allocations Development Plan Document identifies sites where the Council considers development could come forward and sets out the parameters within which these sites should be redeveloped. Sites included have been through a selection process that accords with national planning policy and builds upon the Council's Call for Sites exercises in 2017 and again in 2019, together with the findings of the Growth Capacity Study 2018 which reviewed all sites and assessed whether they were achievable and deliverable.

The Sites Allocation document does not allocate all sites appropriate for development – it focuses on strategic sites (100 or more new homes) and key sites (considered critical to the delivery of the vision for the area but under 100 units). Other sites that come forward will be listed on the Brownfield Land Register published and reviewed annually.

- 36 Each Site Allocation sets out the preferred use or mix of uses as well as any policy criteria or guidance relevant to the development of the site. A 'Placemaking' Plan is included for each allocation. Comments are sought on the proposals contained within the document and the Council's approach. The sites put forward by the Park Authority have not been included and the Growth Capacity Study makes it clear that sites in the Green Belt and MOL have not been considered due to their policy designation.

- 37 **Lee Valley Ice Centre Site and the Waterworks Centre and Car Park**
As discussed above it is considered appropriate to request that the Council include a leisure based site allocation for both the Lee Valley Ice Centre and the Waterworks Centre and car park, please refer to Appendix E to this report.

- 38 Within the Site Allocations Document, the Council proposes allocations for new and replacement leisure developments as a component part of the residential and other types of land use allocations. It so follows that the redevelopment of Lee Valley Ice Centre, given the recent positive decision for the new twin pad development, should also be recognised via allocation or designation for solely leisure development. This would support the Lee Valley Ice Centre in its location long term as a key cultural asset for the borough.

- 39 A similar allocation should be sought for the Waterworks Centre and car park to recognise its leisure use and potential, particularly for visitor accommodation. Both sites could be shown on the same Placemaking Plan to highlight their location within the Regional Park; officers will seek to engage with borough officers to discuss this matter further and to provide further detail for the proposed allocations. The Part 2 Site Allocations document is at an earlier consultation stage compared to the Part 1 Local Plan and there should be time to engage fully on this matter.

40 **Other Site Allocations of Relevance**

Five sites currently allocated within the borough are also of relevance to the Regional Park and comments on each are included in the letter attached at Appendix A to this report. The main concerns relate to the need to fully reference the PDF Area Proposals. This is particularly in relation to:

- enhancing connectivity into the Park;
- improving boundaries between the Park and adjoining sites;

- ensuring development sites provide sufficient open and amenity space to provide for the needs of new residents; and
 - the need to consider the visual and ecological impacts of future development in relation to the Park and its range of visitor, programme and biodiversity assets.
- 41 The Site Allocation **SA02 New Spitalfields Market** is of particular interest to the Authority. Although outside the Park boundary this site is located opposite and to the north of the Lee Valley Hockey & Tennis Centre, and immediately east of Hackney Marshes. The site is owned by the City of London Corporation who intend to relocate the market to a new site in Barking and Dagenham. This will release for redevelopment an area of approx. 11.23 ha which the Council consider can form part of a new neighbourhood 'New Leyton' together with the key strategic sites that surround it. SA02 is considered suitable for a minimum of 3,000 new homes, (35% to 50% affordable), 29,798sqm of replacement employment floorspace and public transport improvements including potential for a new station on Ruckholt Road.
- 42 The key strategic sites referenced above include SA01 the Leyton Mills Retail Centre (owned by Asda Walmart and Aviva Investors), the Temple Mills Lane Bus depot (under the ownership of Highways England) and the Lee Valley Hockey & Tennis Centre. The latter two are both currently within the LLDC jurisdiction and therefore not included in the Site Allocation document. Please refer to Appendix F to this report for a plan of the area.
- 43 The Council in partnership with the landowners, Greater London Authority (GLA) and LLDC have decided to commission work to produce a Development Framework in order to optimise the development potential of the 'New Leyton' area and guide the creation of a new mixed use neighbourhood. Officers from the Authority have been involved in early discussions on the Development Framework. The tender process for this project will complete in late December 2020 ready for work on the framework to start from January 2021 in collaboration with the landowners and stakeholders, including the Park Authority. A report on the development framework will be brought to a future committee in due course.
- 44 Comments have also been made with regard to two sites located adjacent to Lea Valley Road within the Sewardstone area, please refer to Appendix G to this report for a location plan. These sites sit adjacent to an important east west route through the Park and hence it is important that any development brings forward or contributes to accessibility enhancements along this route for the benefit of Park visitors.

ENVIRONMENTAL IMPLICATIONS

- 45 There are no environmental implications arising directly from the recommendations in this report but the draft Local Plan for Waltham Forest both Parts 1 and 2 once adopted will contain policies and allocations 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

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

HUMAN RESOURCE IMPLICATIONS

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

LEGAL IMPLICATIONS

- 48 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.
- 49 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

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

EQUALITY IMPLICATIONS

- 51 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 London Borough Waltham Forest Consultation Proposed Submission Version Local Plan Part 1 Strategic Policies Shaping the Borough 2020- 2035 October 2020

The London Borough Waltham Forest Local Plan Part 2 Draft Site Allocations Document September 2020

PREVIOUS COMMITTEE REPORTS

Regeneration & Planning Committee	RP/11/17	Consultation by London Borough of Waltham Forest on the draft Local plan	14 Dec 2017
Regeneration & Planning Committee	RP/32/19	Consultation by London Borough of Waltham Forest on Regulation 18 draft Local Plan document	19 Sept 2019

APPENDICES ATTACHED

Appendix A	The Authority's draft response to the London Borough of Waltham Forest
Appendix B	Plan showing the Park area within the borough of Waltham Forest
Appendix C	Policy 84 LVRP
Appendix D	Extract from Part 1 Local Plan with diagrams showing Strategic Locations within Waltham Forest and South Waltham Forest
Appendix E	Lee Valley Ice Centre & WaterWorks Centre and car park
Appendix F	Site Allocations SA 02 New Spitalfields Market & associated sites
Appendix G	Site Allocations on Lea Valley Rd

LIST OF ABBREVIATIONS

PDF	Park Development Framework
SSSI	Site of Special Scientific Interest
LVHTC	Lee Valley Hockey & Tennis Centre
HRA	Habitat Regulations Assessment
QEOP	Queen Elizabeth Olympic Park
MOL	Metropolitan Open Land
GB	Green Belt
DPD	Development Plan Document
LBWF	London Borough of Waltham Forest
LLDC	London Legacy Development Corporation
NPPF	National Planning Policy Framework
DMPD	Development Management Policies Document
SPA	Special Protection Area
SPD	Supplementary Planning Documents
SAC	Special Areas of Conservation
GLA	Greater London Authority
LVRPA	Lee Valley Regional Park Authority

This page is blank



Mr Stewart Murray
Strategic Director of Regeneration & Growth
LB Waltham Forest
Sycamore House
Town Hall complex
Forest Road
LONDON
E17

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

3rd December 2020

Dear Stuart

**RE: CONSULTATION ON THE LOCAL PLAN SHAPING THE BOROUGH:
PART 1 STRATEGIC POLICIES PROPOSED SUBMISSION VERSION
(REGULATION 19 CONSULTATION) & PART 2 DRAFT SITE
ALLOCATIONS DOCUMENT (REGULATION 18 CONSULTATION) - LEE
VALLEY REGIONAL PARK AUTHORITY REPRESENTATIONS**

Thank you for consulting the Regional Park Authority on the Draft Local Plan Proposed Submission Version Part 1 Strategic Policies and the Part 2 Site Allocations Document Regulation 18 consultation.

A report on this matter was considered by the Authority's Members at the Lee Valley Regeneration and Planning Committee on the 3rd December 2020 when the following comments were agreed. Further discussion on the matters raised below would be welcome, there are still outstanding issues relating to the Local Plan policy and the site allocations in respect of support for the Authority's major venues and visitor facilities.

Proposed Submission Local Plan Part 1 Strategic Policies

Protecting and Enhancing the Environment

The inclusion of two new Strategic Objectives (nos. 12 and 13), which relate to the Borough's natural environment and give specific mention to the Lee Valley Regional Park and Epping Forest are welcome as is the inclusion of an addition 'golden thread' that aims to ensure the Local Plan will protect and enhance the natural environment. These additions strengthen the Council's Vision and policy direction in respect of the natural environment and the Regional Park.

The Regional Park is a significant part of the Borough's green infrastructure providing valuable benefits to local communities. Comprising over 500ha it includes key sites such as Banbury Reservoir, the eastern part of Tottenham Marshes, the Walthamstow Wetlands, Walthamstow Marsh, Leyton Marsh, and Essex Filter Beds and major leisure and sporting venues at the Lee Valley Ice Centre, Lee Valley Riding Centre, Waterworks Centre and Lee Valley Hockey and Tennis Centre. Over 380,000 of the Borough's residents visit these sites.

Lee Valley Regional Park Policy 84

The Authority welcomes and supports the addition of Policy 84 'The Lee Valley Regional Park', together with the detail in the supporting text for the Park Development Framework. Reference to the PDF as a "material consideration in the determination of planning applications" will be important given the increasing pressure for development along the boundaries of the Park. The addition of policy text to protect the Lee Valley SPA and Ramsar in accordance with the Local Plan HRA Appropriate Assessment is also welcome, given the need to consider the urbanising effects of development on the open spaces of the Park, particularly within the south of the borough.

Some minor editing is suggested to combine policy statement 84B with D as set out below; this will avoid repetition.

Policy 84 The Lee Valley Regional Park

Proposals which affect the Lee Valley Regional Park will ensure that:

- A. Development proposals include measures for the protection, enhancement and where possible, the extension of the borough's network of Green Corridors.**
- B. ~~Development proposals affecting the Lee Valley Regional Park should be sensitive and proportionate, delivering enhancements where possible and must not contribute to adverse impacts on ecological integrity, amenity or visitor enjoyment.~~**
- C. Development proposals in proximity to the Lee Valley Regional Park should improve access and links to the park and its waterways.**
- D. Development proposals affecting the Lee Valley Regional Park should be sensitive and proportionate, must not contribute to adverse impacts on amenity, ecological integrity or visitor enjoyment; and will be expected to deliver enhancements where possible. The Council supports the Lee Valley Regional Park Authority's Park Development Framework. The contents of the Lee Valley Park Development Framework as adopted is a material consideration in the determination of planning applications.**
- E. Development that affects the Lee Valley Special Protection Area will contribute to the mitigation of adverse effects on the Special Protection Area (SPA).**
- F. Planning applications for development at Blackhorse Lane will need to be accompanied by a project level HRA to ensure the development will not generate adverse urban effects on the integrity of the Lee Valley SPA and Ramsar.**

As part of policy for Epping Forest and the Special Area of Conservation (Policy 83) the Council is proposing to produce SPD guidance for mitigating the impact of development on the SAC/SPA. Under the findings of the HRA, a mitigation framework is required to offset the recreational impacts of the Local Plan. Clarification is required as to whether this work will include the Regional Park and be of relevance to the Lee Valley SPA; if this is the case supporting text to policy should be amended to set out this relationship.

Biodiversity

Amendments to Policy 81 Biodiversity and Geodiversity are welcomed. The revised positive framing of this policy now requiring that all proposals, whether they impact upon biodiversity or not, seek to protect and enhance biodiversity and geodiversity

resources in the borough will assist the Council in its aim to ensure the Local Plan protects and enhances the natural environment.

Unfortunately, the amendments proposed to Policy 81D which relate to the above point have not been implemented in the revised policy text although the officer response in the Consultation Report June 2020 suggests the intention was to make the full change. The Authority's therefore reiterates its previous comment which suggested the following amendment to strengthen the intent of Policy 81 D:

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

Reference to partnership working with the Lee Valley Regional Park Authority as well as Natural England and the Conservators of Epping Forest has also not been included under paragraph 17.19 although the Consultation Report does make a commitment to do this. Likewise reference the Authority's Lee Valley Biodiversity Action Plan adopted in 2019 is still missing from para 17.20. It would be helpful if these minor amendments could be made.

Waltham Forest's Spatial and Growth Strategy and the Strategic Locations

It is disappointing that the Council have decided not to include a policy reference to support proposals within the strategic locations that would help to improve and grow the visitor, sporting and wider cultural offer of the Regional Park and its venues within South Waltham Forest.

The Council will know from the detail and supporting information supplied alongside the application to redevelop the Ice Centre on Lea Bridge Road that the Regional Park's sporting and leisure venues can, and do, make a considerable contribution to the good growth, well-being and cultural place-making of the borough, particularly within the southern growth zone identified in the Plan. Whilst the 'Vision for the South' highlights the importance of the Regional Park's open spaces there is no mention of the contribution and future potential of major sporting and leisure venues such as the Lee Valley Ice Centre and the Lee Valley Hockey and Tennis Centre and the potential to enhance leisure and visitor facilities within sites such as the WaterWorks Centre.

Policy for strategic growth in South Waltham Forest has been condensed into Policy 9. This refers to the cultural and sporting assets in the South area and that proposals will be supported where they increase visitor economy and build a vibrant evening and night-time offer. This does not cover the range of opportunity that could be realised within the Regional Park in Waltham Forest South. Indeed, the combination of leisure and sporting venues within the South of Waltham Forest is exceptional. It includes an Olympic legacy facility for Hockey and Tennis, including disability sports, an international sized Ice Centre, soon to be redeveloped as a state of the art twin pad facility, and a Riding Centre offering facilities for novice through to advance riders including riding lessons for the disabled. The leisure potential of the WaterWorks Centre is also currently under consideration by the Authority, particularly in relation to visitor facilities and visitor accommodation.

The Authority therefore maintains its position that a policy reference is needed within this section of the Local Plan and that this should address specifically the distinctive opportunities and growth potential of the Regional Park's leisure and sporting venues. The following policy text is proposed under Policy 9; this could be added as an extra bullet N as follows:

Policy 9 South Waltham Forest

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

- N. Create opportunities to improve and grow the visitor, sporting and wider cultural offer of the Lee Valley Regional Park and its venues; including the Lee Valley Ice Centre, the Lee Valley WaterWorks Centre and the Lee Valley Hockey and Tennis Centre, thereby ensuring their long-term sustainability and contribution to the visitor economy of the borough**

The Authority would also wish to see the Lee Valley Ice Centre re designated within the Lea Bridge strategic location as a leisure destination, to recognise its current and future role in terms of ice sport, training and leisure activity. Its retention as part of MOL is also questioned. Given the recently approved redevelopment proposals, the Ice Centre site presents a significant anomaly combined with Essex Wharf in the west and the Authority would wish to see this area re-examined in terms of its MOL designation.

The Waterworks Centre and car park requires a similar treatment within the Local Plan Part 1 Strategic Policies to recognise it as a leisure site suitable for visitor accommodation in line with the Park Development Framework Area proposals. Its current location within MOL is however likely to place limits on the type and scale of future leisure use and development. The findings of the Council's focused Green Belt and MOL review concluded that potential harm to MOL resulting from the development of the Waterworks building and car park would be moderate to low in terms of the remaining MOL in the area **"as this area is more contained by urbanising development and has a less significant relationship with the wider MOL than the south eastern end of the area."** Given these findings and the Authority's PDF proposals, it is considered appropriate to seek a realignment of the MOL boundary in this area to remove the Waterworks Centre and its car park. The Authority would support the Council in seeking such an amendment to the MOL boundary, whilst also proposing a leisure designation for the site.

Whilst the Council recognises the need for future SPD/master planning for the Lea Bridge Strategic Location the Authority does not consider this would be the appropriate mechanism through which to alter the MOL boundaries.

The proposed additions to supporting text 5.15 should also be amended as follows:

The South is home to important sporting and cultural venues. These include the Lee Valley Ice Centre, Lee Valley Riding Centre, and Lee Valley Waterworks Centre in Lea Bridge and Church Road Strategic Location; Leyton Orient, Ive Farm and the Lee Valley Hockey and Tennis Centre in Leyton and the Heart of Leyton (Leyton Cricket Hub) in Bakers Arms and Leyton Green. There are opportunities to add to these facilities, including supporting the night time economy (see Policy 46 - Evening and Night-time Economy Uses) and these will be supported in Strategic Locations and Town Centres (in accordance with Policy 39 - Hierarchy of Centres) and the boroughs cultural and sporting needs (see Policy 36 - Promoting Culture and Creativity).

Draft Local Plan Part 2 Site Allocations Document

Lee Valley Ice Centre site and the Waterworks Centre and car park

In view of the points raised above the Authority would also wish to see both the Ice Centre and the WaterWorks Centre included as Site Allocations within the Part 2 Local Plan Site Allocations document.

Proposals for new and replacement leisure developments are included within a number of the sites in the Site Allocation document alongside residential and other types of land use allocations. It is therefore considered appropriate, given the recent positive decision for the new twin pad development at the Ice Centre, that it should also be recognised via an allocation or a designation for solely leisure development. This would support the Ice Centre in its location long term as a key cultural asset for the borough.

A similar allocation should be sought for the Waterworks Centre and car park to recognise its leisure use and potential, particularly for visitor accommodation. Both sites could be shown on the same Placemaking Plan to highlight their location within the Regional Park and elaborate on the PDF Area proposals that would apply. Officers would welcome the opportunity to engage with borough officers to discuss this matter further. The Part 2 Site Allocations document is at an earlier consultation stage compared to the Part 1 Local Plan and there should be time to engage fully on this matter.

The Authority's comments on the proposed Site Allocations currently included in the draft Development Plan Document are set out below and relate to sites located both within the Regional Park and those located adjacent to its boundary. Comments relate to the Place Making plans.

South Waltham Forest

Site SA02 New Spitalfields Market

SA02 lies outside the Regional Park but opposite the Lee Valley Hockey and Tennis Centre. Both sites form part of the 'New Leyton' Development area. Reference within the Site Allocation to supporting development where it provides connections with the Regional Park and QEOP and opens up Hackney Marshes are noted, but with the quantum of development proposed, this site allocation will need to provide a substantial area and range of open spaces to cater for the needs of the new residents. Proposed green/open space should be indicated on the Placemaking map. This open space should then be located and designed to complement the adjoining Lee Valley Hockey & Tennis Centre to the south and Hackney Marshes to the west.

The Lee Valley Hockey & Tennis Centre opposite forms part of the QEOP and serves a regional, national and international sporting and leisure market as well as serving local sporting need in relation to tennis and hockey. It includes areas of public open space and areas of valuable habitat in relation to both the LLDC and LVRPA Biodiversity Action Plans but the Authority's primary objectives in relation to the site are to ensure it continues to play its part in developing the QEOP as a zone of sporting excellence.

The reference to new walking routes going north towards Lea Bridge Road are noted as is the reference to connections into the Regional Park and QEOP. Area 1 PDF Proposals identify the need for partnership working to "to promote and enhance both

routes into the Regional Park and those between the Regional Park and the areas of the QEOP and Stratford that lie just outside the boundary" in order to establish a network of visitor facilities and open spaces linking the QEOP with the wider Regional Park, including Hackney Marshes, the Waterworks visitor hub, and Walthamstow Wetlands. Proposals also identify the opportunity to "develop and promote a primary gateway into the Regional Park and QEOP from the northeast" which would be signed from Leyton, through the Lee Valley Hockey and Tennis Centre. Future development within this site could assist in achieving this entrance/gateway and this should be referenced.

The 'potential for height' noted in the Placemaking Plan should also consider views through into both the Regional Park (including views to the north 'up the valley') and the QEOP; maintaining views south through to the VeloPark will be important for example.

The site allocation makes no mention of biodiversity and yet this site presents opportunities for habitat enhancements around the river frontage that sits on the western side of the site. Its frontage to the waterfront should be noted and a river restoration scheme should be identified as part of the Placemaking Plan included in the Site Allocations.

Site SO10 Low Hall Depot

This allocation sits partially within the Park (please refer to Appendix D) and is located to the north east of Walthamstow Marshes; this should be referenced in the site allocation. The Placemaking Plan indicates proposed green space and pedestrian and cycle connectivity. This should be spelt out within the proposed site allocation requirements. It is important to establish pedestrian and cycle links with the rest of the Regional Park in line with the PDF Area 2 Proposals which highlight the importance of reconnecting the Low Hall area into the rest of the Park at Walthamstow Marshes and improving the provision of facilities for visitors.

Biodiversity proposals seek to safeguard existing ecological values at Low Hall Farm Flood Meadow, which lie adjacent. The frontage onto the Dagenham Brook is also a key element of the site. A river restoration scheme should be considered.

North Waltham Forest

SA53 Motorpoint and SA54 Lea Valley Motor Company Sewardstone Rd

These sites are located within the Regional Park and this should be recognised in the allocation description. They sit adjacent to an important east west route through the Park and any development should seek to enhance its quality and accessibility. PDF Area Visitor proposals state that "On the Lea Valley Road, gateway features at either end to be combined with traffic calming, the setting back of fencing and the creation of broad pedestrian boulevards to be linked to the Lea Valley Walk and the Pathway Corridor (5.A.1)".

The Placemaking Plan for SA53 identifies potential for tall buildings. It should also recognise the proximity of the King George's and William Girling Reservoirs and their SSSI status. These areas sit within the key north south route for bird migration in the Lee Valley and this will need to be considered in relation to any tall buildings and overlooking of the reservoirs.

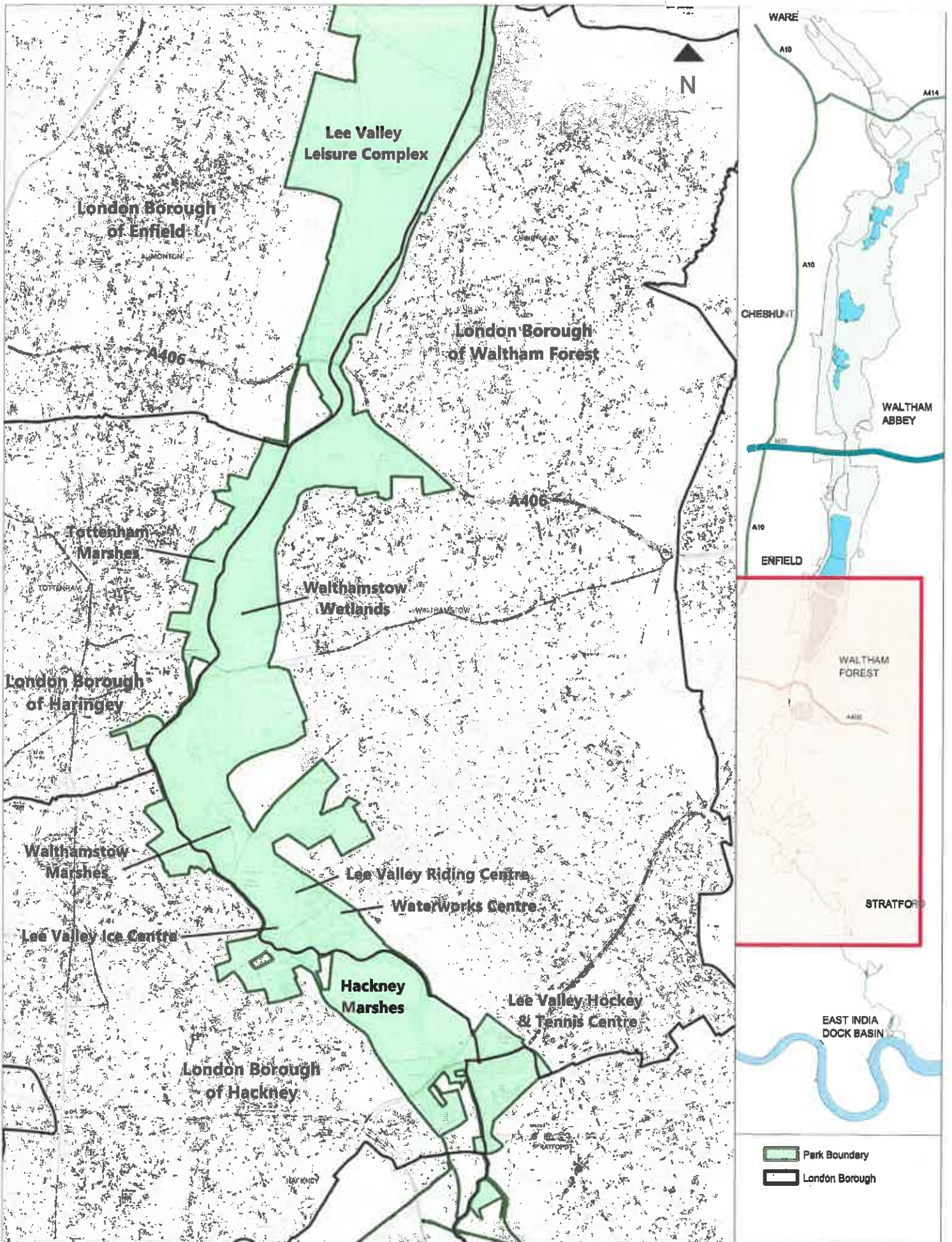
Proposed green space adjacent to the waterway is noted but this is the Flood Relief Channel and therefore improvements may be limited.

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

Yours sincerely

Claire Martin
Head of Planning

This page is blank



Lee Valley Regional Park Authority within London Borough of Waltham Forest



NTS @ A4
04.09.19

Produced by: Corporate GIS (AAB)
M:\Caddcorp Critical Data\User Specific Maps\Gmte Maps 2017 - 19\Area Action Plans\2016 LA within LVP Maps\Waltham Forest v1 (AB) 040919-PT

© Crown Copyright and Database rights 2019. Ordnance Survey 100019982

This page is blank

Extract from Local Plan Proposed Submission Version Part 1 Strategic Policies Lee Valley Regional Park Policy 84

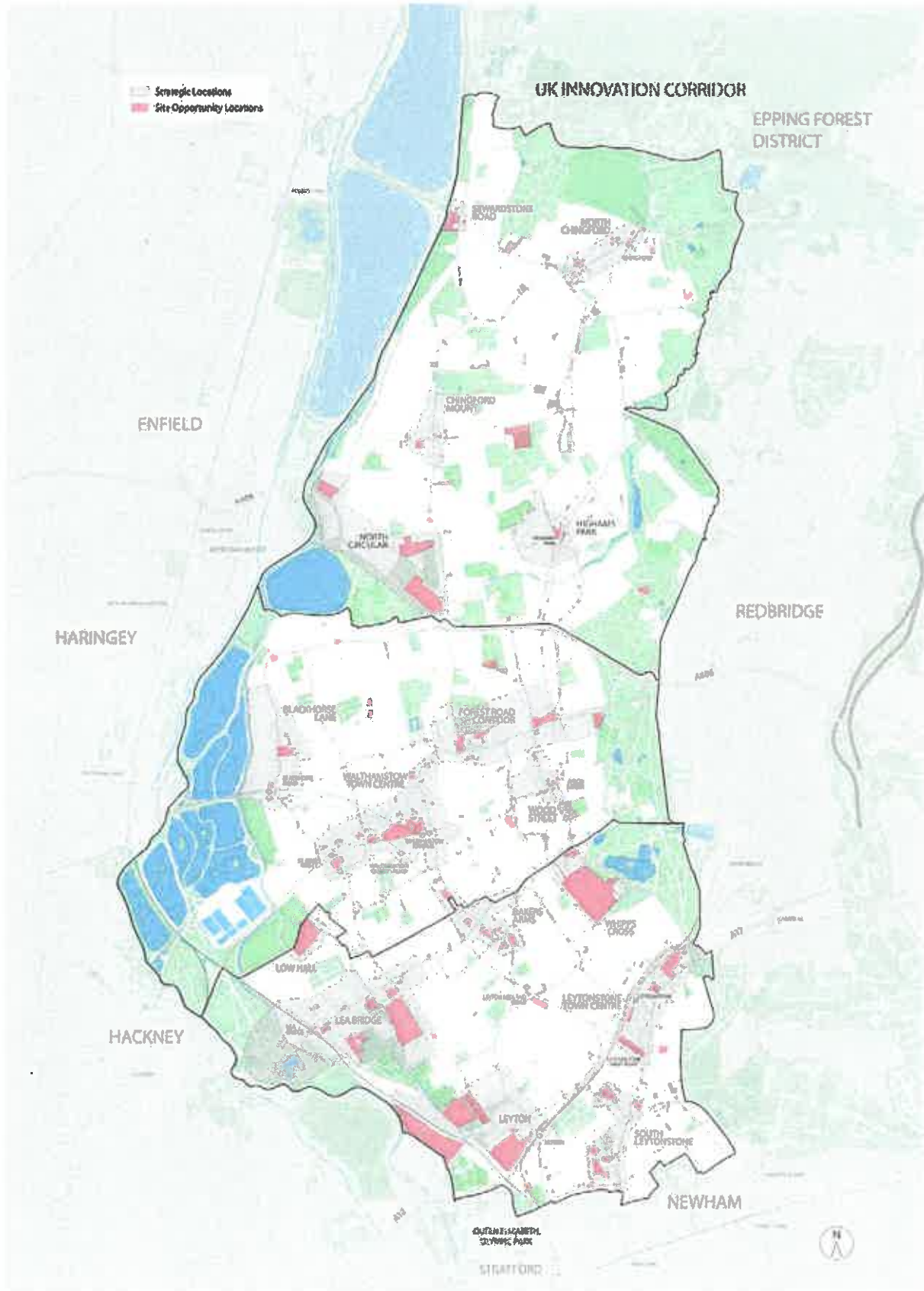
Policy 84 - The Lee Valley Regional Park

Proposals which affect the Lee Valley Regional Park will ensure that:

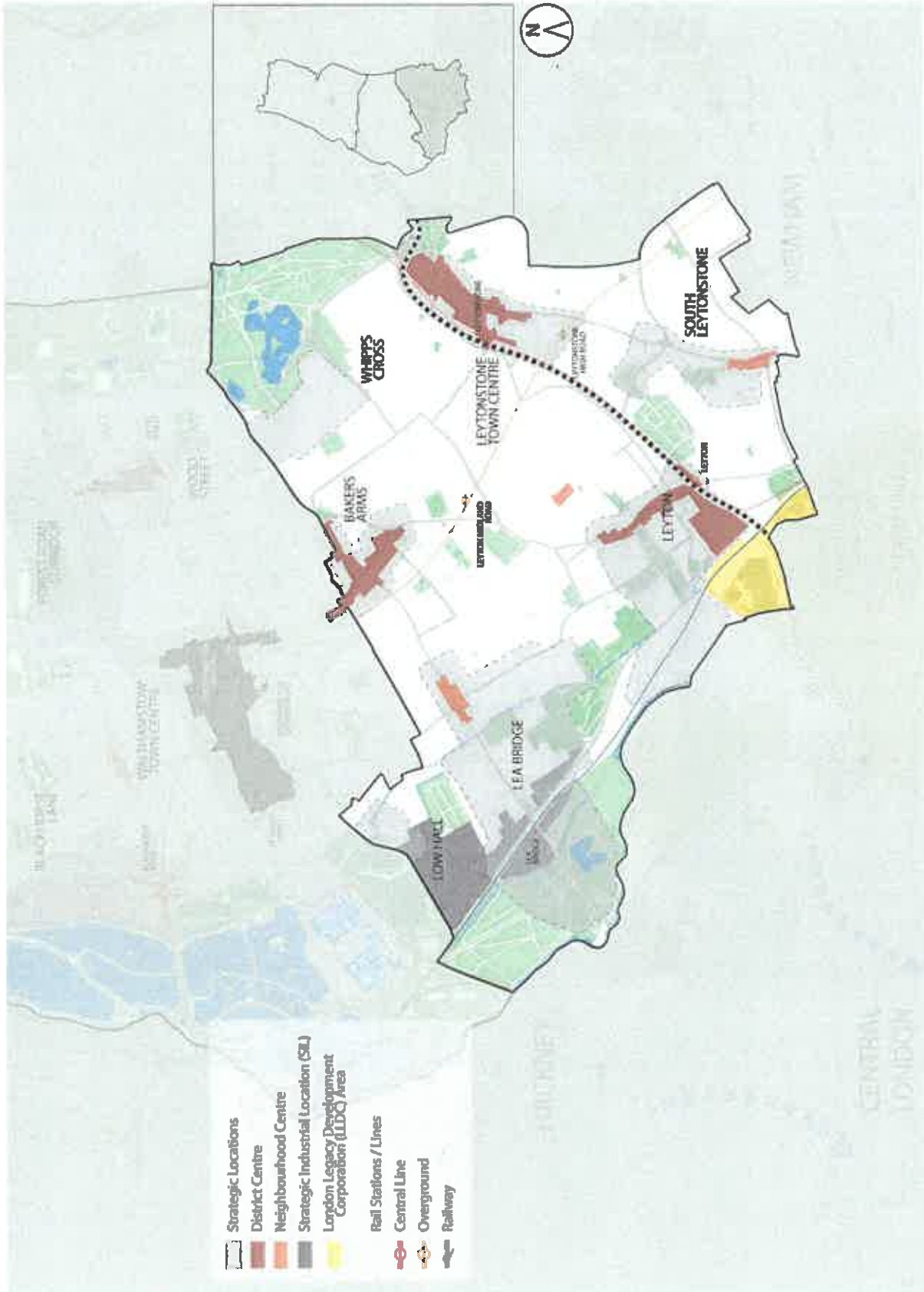
- A. Development proposals include measures for the protection, enhancement and where possible, the extension of the borough's network of Green Corridors.
- B. Development proposals affecting the Lee Valley Regional Park should be sensitive and proportionate, delivering enhancements where possible and must not contribute to adverse impacts on ecological integrity, amenity or visitor enjoyment.
- C. Development proposals in proximity to the Lee Valley Regional Park should improve access and links to the park and its waterways.
- D. Development proposals affecting the Lee Valley Regional Park must not contribute to adverse impacts on amenity, ecological integrity or visitor enjoyment; and will be expected to deliver enhancements where possible. The Council supports the Lee Valley Regional Park Authority's Park Development Framework. The contents of the Lee Valley Park Development Framework as adopted is a material consideration in the determination of planning applications.
- E. Development that affects the Lee Valley Special Protection Area will contribute to the mitigation of adverse effects on the Special Protection Area (SPA).
- F. Planning applications for development at Blackhorse Lane will need to be accompanied by a project level HRA to ensure the development will not generate adverse urban effects on the integrity of the Lee Valley SPA and Ramsar.

This page is blank

Diagrams extract from Part 1 Local Plan Submission Version



South Waltham Forest





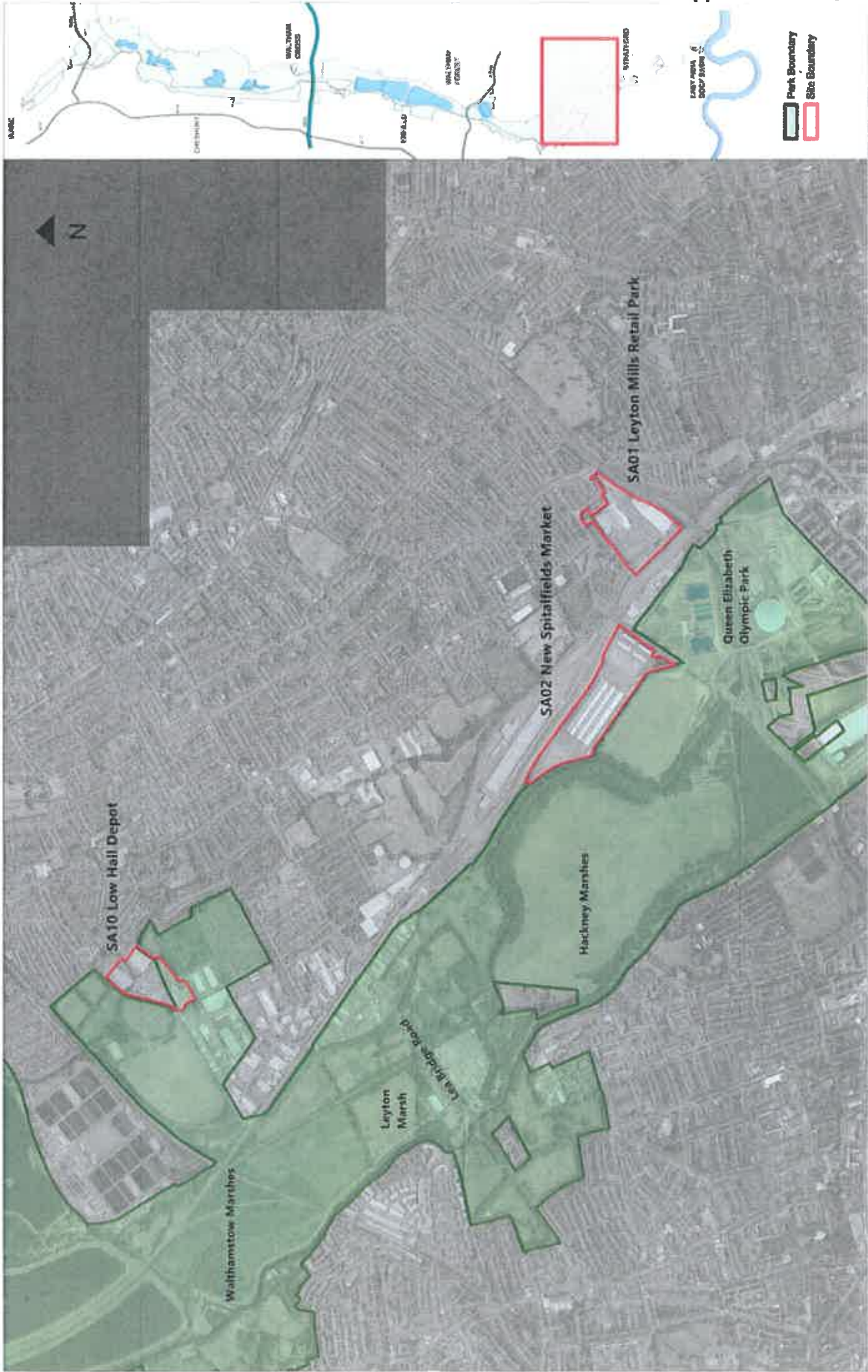
London Borough Waltham Forest Local Plan: Plan 3 - Site Allocations for Leisure (Lea Bridge Road)

NTS @ A4
18.11.20

Produced by: Corporate GIS (AAB)
M:\Cardcorp Critical Data\User Specific Maps\Comte Maps 2017 - 20\2020 Maps\LBWF Local Plan Consultation\Call for Sites Plan 3 (AB) 181120-PT

© Crown Copyright and Database rights 2020. Ordnance Survey 100019982





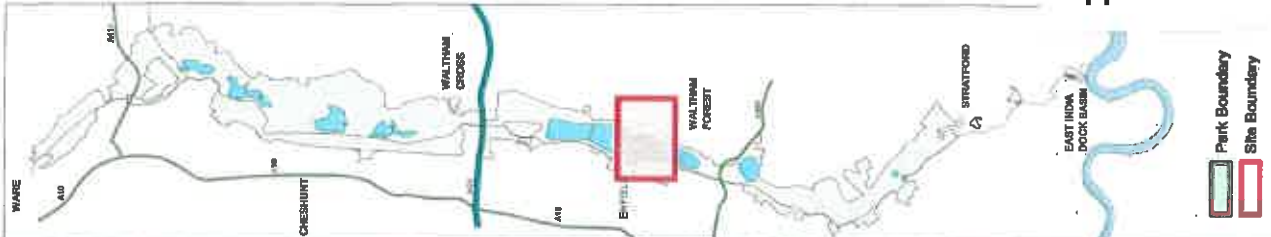
London Borough Waltham Forest Local Plan: Plan 2 - Call for Sites (Leyton and Low Hall Area)

NTS @ A4
05.11.20

Produced by: Corporate GIS (AAB)
M:\C:\corp Critical Data\user Specific Maps\Centre Maps 2017 - 202020 Maps\LBWF Local Plan Consultation\Call for Sites Plan 2 (AB) 051120-PT

© Crown Copyright and Database rights 2020. Ordnance Survey 100019982





London Borough Waltham Forest Local Plan: Plan 1 - Call for Sites (Sewardstone Area)

NTS @A4
05.11.20

Produced by: Corporate GIS (AAB)
M:\Caddorp Critical Data\User Specific Maps\Cirrite Maps 2017 - 2020\20 Maps\LBWF Local Plan Consultation\Call for Sites Plan 1 (AB) 051120-PT

© Crown Copyright and Database rights 2020. Ordnance Survey 100019982



This page is blank