 <p>LEE VALLEY REGIONAL PARK AUTHORITY</p> <p>REGENERATION AND PLANNING COMMITTEE</p> <p>18 JANUARY 2018 AT 12:00</p>	<p>Agenda Item No:</p> <p>5</p> <p>Report No:</p> <p>RP/12/18</p>
---	---

**NEWHAM LOCAL PLAN PROPOSED SUBMISSION
REGULATION 19 CONSULTATION DOCUMENT**

Presented by the Head of Planning and Strategic Partnerships

SUMMARY

The London Borough of Newham is consulting on its Proposed-Submission draft Local Plan which includes policies for change and growth through to 2033 and sets out plans to make the best use of available space and opportunities in response to local needs.

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 later this year. 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 main areas of interest for the Authority are spatial strategies for key areas within the Arc of Opportunity at Stratford and Canning Town and policies relating to green infrastructure, the blue ribbon network and those strategies and policies that support and enable the delivery of the Lee River Park. The Authority's comments are largely supportive with minor amendments sought where reference is included to the Regional Park.

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 Newham Council on the Proposed Submission Draft Local Plan.

BACKGROUND

- 1 The London Borough of Newham's draft Proposed Submission Local Plan contains revised draft objectives, vision-based spatial policies, thematic policies (covering Successful Places, Jobs, Homes, Sustainability and Infrastructure)

and associated site allocations and designations to facilitate Newham's future growth and development. It combines and updates the existing Core Strategy (2012) and Detailed Sites and Policies DPD (2016) and will result in an update to the Policies Map following examination and adoption. This Plan together with the representations received will be submitted to the Planning Inspectorate later this year for Examination.

- 2 Overall, the Local Plan seeks to deliver 43,000 homes and 60,000 jobs between 2017 and 2032, as a series of new mixed-use places. It seeks to achieve "transformational change" recognising this will require a significant improvement in the quality of design and overall offer of development, a more balanced mix of uses, and better integration between and across sites and neighbourhoods.
- 3 The greatest opportunities for change remains within the Arc of Opportunity which will be the main focus for job creation, infrastructure development and majority of new housing, including tall buildings located at public transport nodes. The Arc includes sites in close proximity to the Park; Canning Town, Stratford and West Ham. The Lower Lea Valley falls within the broad area within which Newham are planning to undertake a major but managed shift from traditional industrial activity towards high technology and creative industries, visitor, retail and leisure and cultural economy, making better use of heritage and other character assets.
- 4 The Regional Park within the London Borough of Newham includes Bow Creek Ecology Park and part of the Greenway. Other sections of the Park, including Three Mills Island, significant parts of the Queen Elizabeth Olympic Park - the Lee Valley VeloPark and land consisting of the northern parklands lie within the 'Newham component' of the London Legacy Development Corporation (LLDC). Please refer to the Plan at Appendix B to this report which shows these areas of the Park within Newham.
- 5 The Authority's Park Development Framework (PDF) Area 1 Proposals (adopted in Nov 2015), seek to maintain and enhance the ecological connectivity along towpaths and linear routes such as the Greenway and the Leaway. Proposals aim to minimise the impact of new development on these routes and open spaces and seek to achieve a balance in protecting their ecological value and potential as well as promoting the recreational and leisure opportunities they provide for the wider benefit of local people and visitors to the Park. In particular Bow Creek Ecology Park is to be safeguarded and enhanced as an Access to Nature Site with an emphasis on educational use.
- 6 In April 2017 officers responded to the Local Plan Issues and Options consultation, drawing attention and referring to the adopted Area 1 Proposals which cover the Park within Newham. Options to improve and protect biodiversity, ecological connectivity and delivery of green infrastructure were supported as were policy options supporting the delivery of the Lea River Park.

REPRESENTATIONS ON THE PROPOSED SUBMISSION LOCAL PLAN

- 7 The Authority's representations on the proposed Submission Local Plan are attached as Appendix A to this report. These are largely supportive of the changes made with some minor amendments sought where reference is included to the Regional Park. The main points are outlined below.
- 8 **Spatial Policies**

Support is given to the Local Plan's overarching strategic principle and vision based strategy S1. This continues to promote the Arc of Opportunity as the primary focus for growth and infrastructure development (policy S1.2a Spatial Strategy) including policy support (S1.2h) for the creation of a connected and legible movement and green space network that will connect residents with the rivers and docks. The Regional Park remains an important element in the open space network of the Lower Lea valley even though a significant part lies within the area overseen by the LLDC.

- 9 Spatial Policy for Stratford and West Ham (S2) has been substantially reworked but the vision based strategy is considered supportive of the Authority's own proposals for the area seeking to enhance the area's heritage and improve access to the Greenway and the waterways so that they form an integral part of the areas future development.
- 10 Given these policy statements it is surprising that reference to the Regional Park has been removed from the list of key open spaces included under policy S2. Sub section 2i in this revised version of the policy. Later in the Local Plan the Regional Park is included as part of the Borough's green grid network and notated on the 'Green Grid, Open Space & the Blue Ribbon Network' diagram, (page 322). An amendment should therefore be sought to policy 2i, to reinstate reference to the Regional Park in order to ensure the strategy is sound.

*The provision, quality and access to open space will be improved, including extending green grid links to the Greenway, the Lea River Park, **Lee Valley Regional Park** and Queen Elizabeth Olympic Park and improving access to Abbey Creek, and waterways, and other measures to improve the activation of parks and open spaces.*

This is shown in the letter attached as Appendix A to this report.

- 11 Spatial policy for Canning Town and Custom House S4 pulls together references to the Lea River Park and the importance of new greenspace broadening out at Cody Dock and linking into the Bow Creek Ecology Park as part of a new improved green grid amidst large scale residential development. Bow Creek will form an important element of the Lea River Park and proposals which will enhance links to this site are welcomed.
- 12 **Thematic Policies**
The comments attached offer support for a number of the thematic policies in the Local Plan including SC4 Biodiversity, INF 1 Strategic Transport and INF2 Sustainable Transport. Policy INF6 Green Infrastructure and the Blue Ribbon Network and INF7 Open Space and Outdoor Recreation are important for the delivery of the PDF Area 1 Proposals and are supported.
- 13 Newham have recognised that growth, particularly in the Arc of Opportunity will place increasing pressure on green spaces and the other forms of green infrastructure. The Local Plan policy seeks to both protect and promote green and blue infrastructure to create high quality places, enhance biodiversity, improve drainage capacity and reduce flooding and contribute to visitor amenity and general well-being. The Lea River Park is highlighted as an important project in this respect. Active use of open space and the Blue Ribbon network will be encouraged and improvements sought to enhance its quality, quantity and connectivity.

- 14 A few minor amendments to policy INF6 Green Infrastructure and the Blue Ribbon Network and justification text are highlighted within the comments attached in order to correctly reference the PDF Area 1 Proposals as the adopted proposals for this area of the Park.

ENVIRONMENTAL IMPLICATIONS

- 15 There are no environmental implications arising directly from the recommendations in this report but the draft Local Plan for Newham 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

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

HUMAN RESOURCE IMPLICATIONS

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

LEGAL IMPLICATIONS

- 18 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 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.
- 19 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

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

EQUALITY IMPLICATIONS

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

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

BACKGROUND REPORTS

Local Plan review Proposed Submission Draft November 2017
Regulation 19 Consultation Document

APPENDICES ATTACHED

Appendix A The Authority's draft response to London Borough of Newham
Appendix B Plan showing the Park area within the borough of Newham

LIST OF ABBREVIATIONS

PCPA Planning and Compulsory Purchase Act 2004
PDF Park Development Framework
LLDC London Legacy Development Corporation

Appendix A to Paper LLV/12/18



Local Plan Team
Local Plan Review
London Borough of Newham
Newham Dockside
1000 Dockside Road
London E16 2QU

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

18th January 2018

Dear Sir/Madam

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

Thank you for consulting the Regional Park Authority on the Proposed Submission version of the Draft Local Plan (Regulation 19 consultation) document.

A report on this matter was considered by the Authority's Members at the Regeneration and Planning Committee on the 18 January 2018 when the following comments were agreed as the Authority's formal representations on the Proposed Submission Local Plan.

Spatial Policies and the Lee Valley Regional Park

Stratford and West Ham

The Authority supports the overarching strategic principle and vision based strategy which continues to promote the Arc of Opportunity as the primary focus for growth and infrastructure development (policy S1. Sub section 2a Spatial Strategy) and the policy support (S1.sub section 2h) for the creation of a connected, and legible movement and green space network that will connect residents with the rivers and docks. The Regional Park is a key element in the open space network of the Lower Lea Valley and makes an important contribution to the cultural and leisure economy of Arc.

The Authority welcomes the renewed focus for Stratford and West Ham and the vision based strategy that seeks to achieve improvements to the areas heritage and character assets, including views from and access to the Greenway, and enhanced access to the waterways (Policy S2. Sub section 2e). Given this policy statement it is unclear why reference to the Regional Park has been removed from the list of key open spaces included under policy S2. Sub section 2i. The Regional Park was identified in the Borough's original Core Strategy as part of Newham's Green Infrastructure and this designation

has been carried across to the current draft Local Plan with the inclusion of the Regional Park on the diagram, (page 322) entitled 'Green Grid, Open Space & the Blue Ribbon Network'. The following amendment is therefore proposed to policy 2i. to ensure the spatial strategy is sound:

The provision, quality and access to open space will be improved, including extending green grid links to the Greenway, the Lea River Park, **Lee Valley Regional Park** and Queen Elizabeth Olympic Park and improving access to Abbey Creek, and waterways, and other measures to improve the activation of parks and open spaces.

It would also be helpful to show the Regional Park on the map accompanying the chapter on Stratford and West Ham by shading in the area as Green Space, a notation already used to indicate other open space.

Canning Town and Custom House

The Authority supports the reference to Bow Creek Ecology Park added to policy S4. Canning Town and Custom House, under sub section 2k. Bow Creek will form an important element of the Lea River Park and proposals which will enhance links to this site are welcomed.

Likewise the reference in the justification text (paragraph 5.49) to delivery of the Lea River Park vision as part of the wider strategy for the area is welcomed, as is reference to the need for new walking and cycling routes and new bridge links to address continuity and its connectivity to adjacent neighbourhoods.

Thematic Policies

The revised Policy SC4 Biodiversity is supported, particularly the inclusion of aquatic and riparian habitats as part of the boroughs biodiversity to be protected and enhanced (strategic principle SC4.1a.) and the expectation that all development will contribute to the achievement of a net gain in biodiversity.

New policy text relating to the protection of water quality, habitat connectivity and promotion of access to nature is also endorsed, (1.c and 2.b). These elements support the Area 1 Proposals particularly the role of Bow Creek Ecology Park as an access to nature site and its status as a Grade 1 SINC

Infrastructure Policy INF 1 Strategic Transport includes support for proposals that will benefit pedestrians and cyclists, for example extensions to the strategic footpath walking and Cycle Network and provision of cycle hire facilities (INF1. Sub section 1b x to xii). The Authority endorses this policy.

Justification text under INF2 Sustainable Transport which looks at implementation should reference the Authority's Cycling Strategy adopted April 2017. This identifies two 'key gateways' and additional Park entrances at Canning Town and Newham Greenway. Contributions from development within the Arc of Opportunity should be used to help deliver these cycle and

walking proposals to benefit connectivity and access within the Canning Town and Stratford/West Ham areas.

The Authority notes and supports the addition of a policy reference to the Regional Park under Policy INF6 Green Infrastructure and the Blue Ribbon Network, sub section Design and Technical criteria 2b. A few minor amendments are needed however as follows, with more detail added to the justification text:

2b

Development in the vicinity of the Lee Valley Regional Park should contribute to **the** implementation of its adopted plans **and area proposals**.

The new text added under the 'Implementation' section of the justification text also requires a minor edit to clarify which plans are relevant for the Park within Newham

6.256g

*The Lee Valley Regional Park Authority area (LVRPA) extends into Newham as shown on the Policies Map. ~~Development~~ in the vicinity of the **Lee Valley Regional Park** area should therefore have regard to the actions set out in its adopted plans; **the Park Development Framework Area 1 Proposals**, including the Lea River Park and particular policies on biodiversity for instance.*

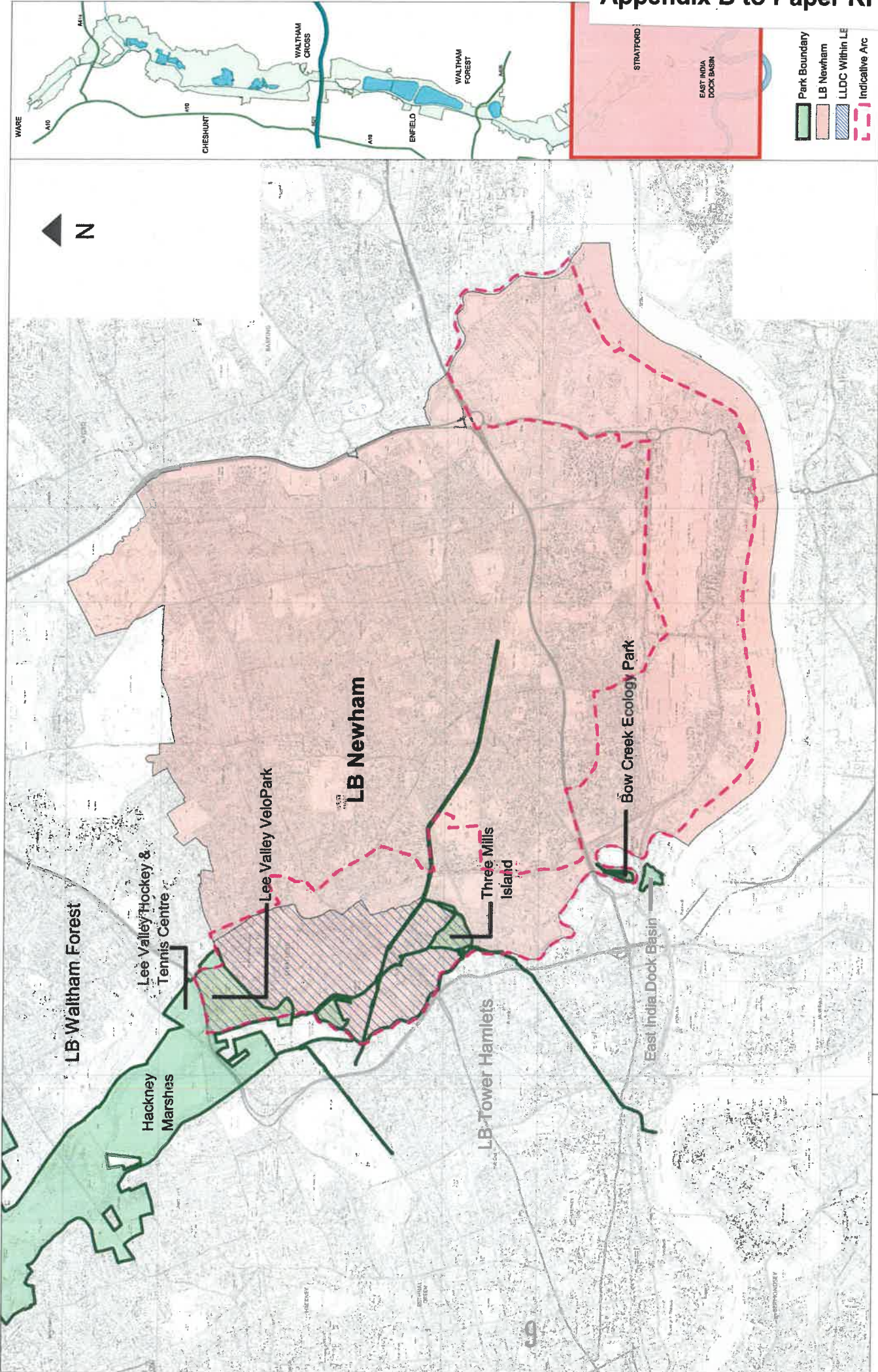
The inclusion of Policy INF7 Open Space and Outdoor Recreation in the draft Local Plan is welcomed. The strategic principles of encouraging active use of open space and the Blue Ribbon network, including through improvements to its quality and quantity and connectivity, complements the Authority's Area 1 Proposals to improve access to and use of the Park with connections through to the more expansive areas of recreational open space to the north.

The principle that major development should incorporate open space provision that meets its own needs, and where relevant wider needs, is endorsed. This is particularly relevant within the Arc and areas such as Canning Town and highlights the importance of delivering the Lea River Park.

Finally the Authority notes and welcomes the Council's aim to work proactively with key partners and stakeholders in order to develop strategic sites and the Arc of Opportunity, remove barriers to delivery and deliver the Local Plan.

Yours sincerely

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



Lee Valley Park Authority within London Borough of Newham (LB of Newham)

1:50000 @ A4
09.01.18

Produced by: Corporate GIS (SA)

© Crown Copyright and Database rights 2018. Ordnance Survey 100019982

T:\User Specific Files\Committee\Area Action Plans\2016 LA within LVP Maps\LB of Newham (SA) 09012018-PT



