



LEE VALLEY REGIONAL PARK AUTHORITY
REGENERATION AND PLANNING COMMITTEE
14 DECEMBER 2017 AT 12:30

Agenda Item No:

5

Report No:

RP/11/17

**CONSULTATION BY
LONDON BOROUGH OF WALTHAM FOREST ON THE
REGULATION 18 DRAFT LOCAL PLAN**

Presented by the Head of Planning and Strategic Partnerships

SUMMARY

The London Borough of Waltham Forest are consulting on their Regulation 18 draft Local Plan which sets out a baseline position and options to determine the pattern of future development. In summary, the Plan seeks to respond to the considerable changes which continue to affect the Borough since the Core Strategy was adopted in 2012 including housing and employment growth. Whilst the draft Plan acknowledges the importance of Lee Valley Regional Park as part of its green infrastructure, it fails to adequately acknowledge the important contribution of venues including Lee Valley Riding Centre, Lee Valley Ice Centre and Lee Valley Hockey and Tennis Centre.

Whilst the Plan seeks to maintain the existing hierarchy of town centres across the Borough, 2 new centres at Blackhorse Lane and Lea Bridge are identified and a series of options are suggested for how the projected levels of growth across the Borough can best be accommodated, including the release of Green Belt Metropolitan Open Land. In response to the 'call for sites' which has accompanied the Council's consultation, officers have suggested inclusion of the Waterworks car park, building and additional land and the western portion of the existing Lee Valley Ice Centre car park. It is considered these sites can support both the Authority's and Council's priorities. A draft response letter is included at Appendix A to this report.

RECOMMENDATION

Members Approve: (1) the comments included in the draft letter at Appendix A to this report.

BACKGROUND

- 1 Large areas of the Regional Park and several venues lie in Waltham Forest. These include Banbury Reservoir, 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 at Leadmill Lane, Eton Manor. In total this amounts

to 556ha. A plan indicating the extent of land in the Regional Park and in the administrative boundary of the Borough is included at Appendix B to this report.

- 2 The Regional Park is a major leisure and sporting attraction for the Borough's residents. In 2016/17 approximately 340,000 visits were made to the Authority's venues and parklands in the Borough by Waltham Forest residents. This doesn't account for other facilities within the Park, including driving ranges, rugby clubs and the growth of the recently opened 400 acre Walthamstow Wetlands which has a target figure of 250,000 visits per annum.
- 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).
- 4 In January 2017 (Paper A/4238/17) in response to the Council's draft vision for Lea Bridge Eastside which covers the part of Leyton and sites around the Lea Bridge station, the Authority welcomed the importance given to the Regional Park and the inclusion of the Waterworks Centre building, car park and land to the south for housing. The adopted version of the Vision document refers to this as 'a regeneration opportunity' rather than housing.

REGULATION 18 DRAFT LOCAL PLAN

- 5 The draft plan is structured around a brief summary of the pace of change across the Borough in the last five years and a series of summary pointers to how the Council could respond to these on which comments are requested.
- 6 The draft plan identifies the considerable growth in jobs including a 40% increase in the numbers of resident owned businesses which have occurred during the previous 5 years which has been the highest in London. It also highlights the Council's ambitions to deliver 12,000 new homes by 2020, which is well above the current London Plan target of 862 homes per annum. Sixty percent of these have already been delivered, of which 47% are 'affordable' (which is 21% above the London average). This in part reflects the 2 Housing Zones within the Borough at Blackhorse Road and Leyton.
- 7 The draft plan also highlights the Borough's focus on delivering sustainable transport through the £30m Mini Holland scheme and opening up of the Lea Bridge Road station in 2015. References are made to the Council's ambitions regarding delivering the programme, 'Creative Connections – Culture for All' and the Council's bid for Cultural Borough status through a recently established scheme introduced by the Greater London Authority. Interestingly the section on leisure does not mention the Authority's 3 sports venues in the Borough and Springfield Marina.
- 8 The consultation sets out a series of challenges which the Local Plan has to address:
 - the continued growth in population which during the last 5 years has already grown by 5% and which is set to rise by a further 24% by 2033 requiring 1,810 dwellings per annum (SHMA). Within this figure there will be a 47% increase in the number of people aged over 65 years and an additional 11% of households with children;
 - set against this is the challenge of affordability with the Borough having the second most deprived population in London (69%) for housing deprivation, defined by lack of affordability and poor access;

- despite the relative small size of the Borough's economy it grew in the previous 5 years at 12% per annum, which is well above the average for the London boroughs at 7% per annum. The Council is aiming to address the continued reduction in employment land and to 'upskill' the workforce which currently is low, with 21% having no qualifications compared to the London average of 18%; and
 - other key challenges include the need to ensure residents have access to good quality social infrastructure, resilient and distinctive town centres, addressing the indices of deprivation, and accommodating growth without prejudicing the Borough's cultural and historic amenities.
- 9 The Plan suggests a new vision to guide the Borough's development which seeks to ensure that by 2033 Waltham Forest is a Smart place. This is defined by 10 attributes of which 4 are relevant to this Authority:
- a comprehensive and exciting cultural and creative offer;
 - excellent public transport offer to encourage walking and cycling to ensure a healthy borough with improved air quality;
 - a continuing successful track record of delivering climate change resilience; and
 - a well maintained network of green spaces with high biodiversity values providing facilities for sport and active leisure.
- 10 A series of 'Growth Options' related to the management of the development process by the Council include:
- developer led with limited intervention by the Council which could lead to a sporadic pattern of growth;
 - key growth focused on the Housing Zone areas;
 - a series of growth hubs which are smaller in scale than the above;
 - focus on the existing town centres;
 - a combined approach spreading growth across all options; and
 - exceptional circumstances - this outlines the possibilities of building on Metropolitan Open Land and the Green Belt. It states that changes to the Green Belt boundary would have to be justified only on exceptional circumstances, but there is reference to looking at existing brownfield land within the Green Belt. However, this option indicates that this is an option of last resort and would only be considered where the 'identified development requirements could not be accommodated on previously developed land.'
- 11 The consultation is accompanied by two further documents including a draft affordable housing strategy which advocates for openness and transparency in the calculation of development values calculated by the residual valuation method. Further it advocates that affordable housing should be provided within application schemes on sites.
- 12 The second document is a 'call for sites'. This is a method which allows local planning authorities to encourage landowners to identify sites required for development to deliver the policies of the Local Plan.

APPRAISAL

- 13 Given the important contribution which the Authority's parklands/venues provide for the Borough's leisure needs the draft Plan needs to give greater recognition

of this role and the importance of the Council working with the Authority to protect parklands and develop venues as appropriate through the PDF process, as required by the Lee Valley Regional Park Act 1966. The draft Plan should reflect on the considerable investment likely in a new Ice Centre on Lea Bridge Road, Lee Valley Leisure Trust's plans for improving the offer at Lee Valley Riding Centre and the Authority's joint work programme with the Council securing investment for improving cycling and walking to and across the Regional Park.

- 14 The Authority considers that each of the six development options considered for delivery will have their part to play in the delivery of the Local Plan objectives and in particular its housing targets, which are according to the draft London Plan (2017) projected to be 2,416 dwellings per annum. These are considerably higher than the 872 units per annum which the adopted London Plan currently considers are necessary. There is a clear direction in travel which will require a considerable amount of land to accommodate housing growth during the next 15-20 years.
- 15 Whilst the development options identify the potential for planned growth around various locations throughout the Borough, the Authority considers that the focus should be on sustainable locations including the main centres and transport hubs, including the two new locations which include Lea Bridge Road to be consistent with the Housing Zone. Sites in this area are sustainable given the recently opened station, additional investment from Network Rail in the STAR line and have good access to the Regional Park. These issues are reflected in officer suggestions for the call for sites.

CALL FOR SITES

- 16 Officers have made an assessment of the Authority's estate within the Borough and conclude that there are 3no. sites for consideration in response to the 'call'. Each of these are on 'previously developed' or 'brownfield land' on Metropolitan Open Land (MOL). They include:
 - the west part of the existing Ice Centre car park;
 - the area of land from the middle of Lammas Road extending south to include the car park and facilities building of the existing Waterworks Centre; and
 - the same site but extending south to include the fairway and green of hole 1 and part of the fairway and green of hole 18 of the former par 3 .18 hole golf course.

Plans of each of these sites are included in Appendix C to this report.

- 17 If the Committee agree to these suggestions then the draft letter in Appendix A to this report will be accompanied by completed 'call for site' schedules seeking the de-designation of these sites from MOL designation for each site.

ENVIRONMENTAL IMPLICATIONS

- 18 Environmental implications are dealt with in the body of this report. As part of the Local Plan process the likely environmental implications of the redevelopment of the 3no. sites included in paragraph 16 will be assessed through a Strategic Environmental Assessment. If the sites are included in the Regulation 19 draft Local Plan this will be subject to the test of soundness by

the Planning Inspectorate.

FINANCIAL IMPLICATIONS

- 19 The release of land for non-Park related purposes may realise a capital receipt at some point in the future.

LEGAL IMPLICATIONS

- 20 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

- 21 At this stage it is too early to identify clearly the nature of risk to the Authority.

EQUALITY IMPLICATIONS

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

[Not for publication following the principles of the Local Government Act 1972, Schedule 12A, Part I, Section 3]

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BACKGROUND REPORTS

Regulation 18 Local Plan and additional papers

October 2017

APPENDICES ATTACHED

- Appendix A Draft officer letter
Appendix B Map of Regional Park within the administrative boundary of LBWF
Appendix C Maps of 3no. sites

LIST OF ABBREVIATIONS

- STAR Stratford-Angel Road-Tottenham line
SHMA Strategic Housing Market Assessment
MOL Metropolitan Open Land
PDF Park Development Framework

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Appendix A to Paper RP/11/17

Draft letter

Ms. J Custance
Director of Planning
LB Waltham Forest
Sycamore House
Town Hall complex
Forest Road
LONDON
E17

14th December 2017

Dear Jane,

LB Waltham Forest Regulation 18 Local Plan consultation

Thank you for consulting the Authority on this early draft of your plan.

The Regional Park is a significant piece of the Borough's green infrastructure comprising over 500ha. Key sites include Banbury Reservoir, the eastern part of Tottenham Marshes, the Walthamstow Wetlands, Walthamstow Marsh, Leyton Marsh and Lee Valley Ice Centre, Lee Valley Riding Centre, Waterworks Centre and Lee Valley Hockey and Tennis Centre at Leadmill Lane, Eton Manor. Over 340,000 of the Borough's residents visit these sites.

London Plan Policy 4.5, identifies a series of 'strategic cultural areas' across the capital which includes the Regional Park. These are defined by significant clusters of visitor attractions where strategic policy requires support for their special character. Given the important contribution which the Regional Park makes to your Borough's leisure and recreation needs the draft plan should recognise this role. This would be in conformity with the adopted London Plan.

The draft plan should reference on the considerable investment likely in a new Ice Centre on Lea Bridge Road, Lee Valley Leisure Trust's plans for improving the offer at Lee Valley Riding Centre and the Authority's joint work programme securing investment with the Council in Walthamstow Wetlands and on improving cycling and walking to and across the Regional Park.

Further references should be made to the Authority's planning functions as identified under section 14 of the Lee Valley Regional Park Act 1966 and our adopted area proposals and our current programme of work which includes the development of strategic policy development.

The Authority considers that each of the six development options considered for delivery in your draft plan will have their part to play in its delivery, particular its housing targets. These are considerably higher than the 872 units per annum which the adopted London Plan currently requires. Whilst slightly lower than those projected by the Government's recent consultation there is a clear direction of travel which will require a considerable amount of land to accommodate housing growth during the next 15-20 years.

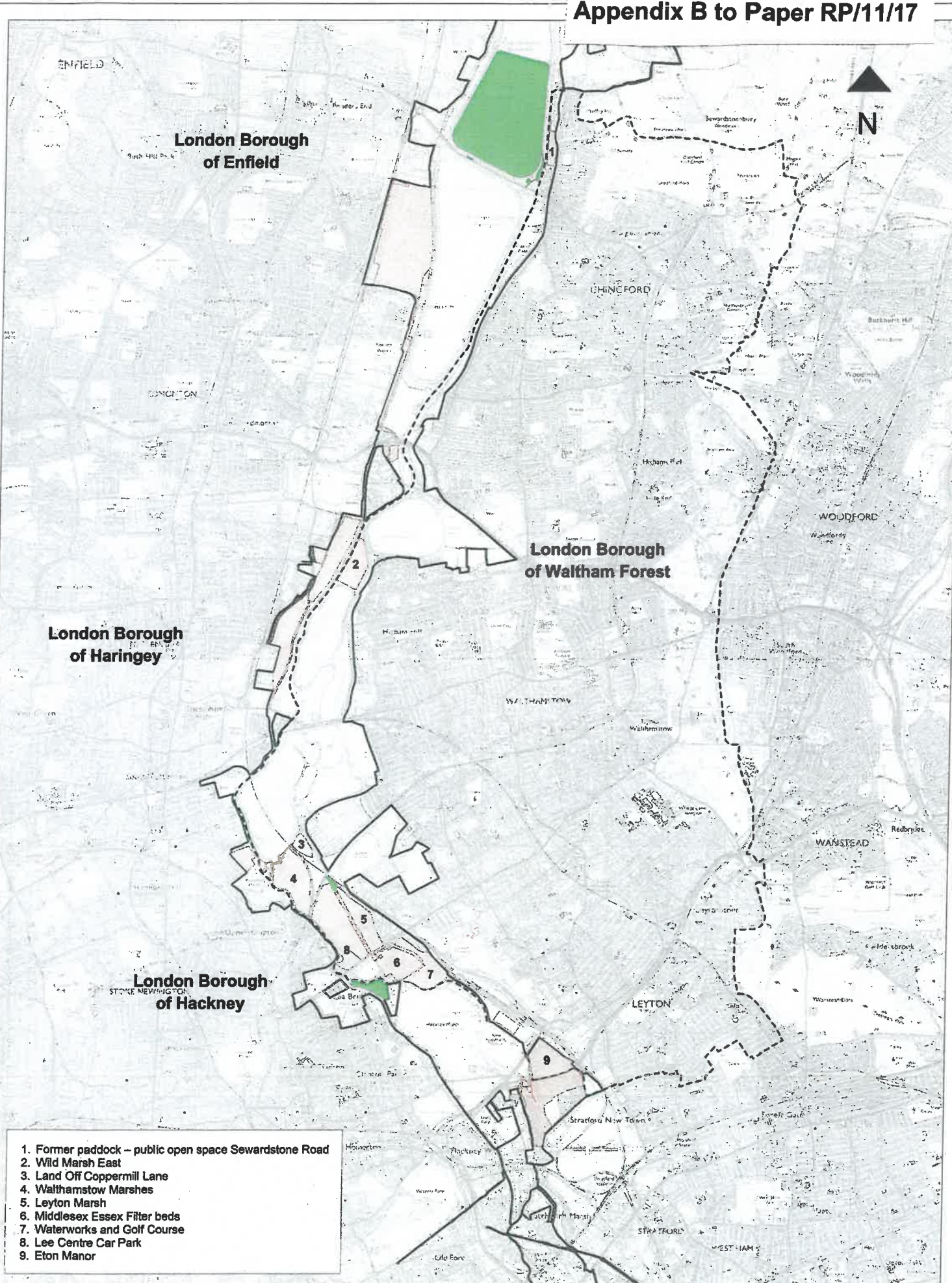
Whilst the development options identify the potential for planned growth around various locations throughout the Borough, the Authority considers that the focus should be on sustainable locations including the main centres and transport hubs including the two new locations which include Lea Bridge Road to be consistent with the Housing Zone. Sites in this area are sustainable given the recently opened station, additional investment from Network Rail in the STAR line and have good access to the Regional Park. These issues are reflected in the Authority's response to your call for sites. These are referenced in the enclosures.

I look forward to meeting with you and your team as the draft plan evolves.

Yours sincerely

Stephen Wilkinson
Head of Planning and Strategic Partnerships

Enclosures: completed schedules in response to the 'call for sites'.



- 1. Former paddock – public open space Sewardstone Road
- 2. Wild Marsh East
- 3. Land Off Coppermill Lane
- 4. Walthamstow Marshes
- 5. Leyton Marsh
- 6. Middlesex Essex Filter beds
- 7. Waterworks and Golf Course
- 8. Lee Centre Car Park
- 9. Eton Manor

LVRPA within the London Borough of Waltham Forest

LVP Freehold
 LVP Leasehold
 Park Boundary
 Waltham Forest Boundary

