

To: David Andrews (Chairman) Valerie Metcalfe
 Chris Kennedy (Vice Chairman) Gordon Nicholson
 John Bevan Paul Osborn
 Christine Hamilton Mary Sartin
 Denise Jones Syd Stavrou
 Heather Johnson

A meeting of the **REGENERATION AND PLANNING COMMITTEE** (Quorum – 3)
will be held at Myddelton House on:

THURSDAY, 19 SEPTEMBER 2019 AT 11.00AM

at which the following business will be transacted:

AGENDA

Part I

1 To receive apologies for absence.

2 **DECLARATION OF INTERESTS**

Members are asked to consider whether or not they have disclosable pecuniary, other pecuniary or non-pecuniary interests in any item on this Agenda. Other pecuniary and non-pecuniary interests are a matter of judgement for each Member. (Declarations may also be made during the meeting if necessary.)

3 **MINUTES OF LAST MEETING**

To approve the Minutes of the Meeting held on 14 February 2019 (copy herewith).

4 **PUBLIC SPEAKING**

To receive any representations from members of the public or representative of an organisation on an issue which is on the agenda of the meeting. Subject to the Chairman's discretion a total of 20 minutes will be allowed for public speaking and the presentation of petitions at each meeting.

- 5 **PLANNING CONSULTATION FROM EPPING FOREST DISTRICT COUNCIL ON AN APPLICATION FOR THE CHANGE OF USE AND CONVERSION OF EXISTING AGRICULTURAL BUILDINGS TO CREATE 5 NEW DWELLINGS, TEMPLE FARM, HIGH STREET, ROYDON, CM19 5LW** **Paper RP/34/19**

Presented by the Policy Officer

- 6 **PLANNING CONSULTATION BY THE BOROUGH OF ENFIELD ON TWO APPLICATIONS, A FULL APPLICATION FOR STRATEGIC INFRASTRUCTURE WORKS AND AN OUTLINE APPLICATION FOR A MIXED USE RESIDENTIAL LED DEVELOPMENT BOTH RELATING TO MERIDIAN WATER.** **Paper RP/33/19**

Presented by the Policy Officer

- 7 **LONDON BOROUGH OF WALTHAM FOREST LOCAL PLAN REGULATION 18 CONSULTATION DOCUMENT** **Paper RP/32/19**

Presented by the Policy Officer

- 8 **Such other business as in the opinion of the Chairman of the meeting is of sufficient urgency by reason of special circumstances to warrant consideration.**
- 9 **Consider passing a resolution based on the principles of Section 100A(4) of the Local Government Act 1972, excluding the public and press from the meeting for the items of business listed on Part II of the Agenda, on the grounds that they involve the likely disclosure of exempt information as defined in those sections of Part I of Schedule 12A of the Act specified beneath each item.**

**AGENDA
Part II
(Exempt Items)**

- 10 **Such other business as in the opinion of the Chairman of the meeting is of sufficient urgency by reason of special circumstances to warrant consideration.**

11 September 2019

**Shaun Dawson
Chief Executive**

LEE VALLEY REGIONAL PARK AUTHORITY

REGENERATION & PLANNING COMMITTEE MINUTES 14 FEBRUARY 2019

Members Present: David Andrews (Chairman) Gordon Nicholson
Chris Kennedy (Vice Chairman) Paul Osborn
John Bevan Mary Sartin
Derek Levy (Deputy for Christine Hamilton) Syd Stavrou
Valerie Metcalfe

Apologies Received From: Christine Hamilton, Denise Jones, Heather Johnson

In Attendance: Derrick Ashley, Frances Button, Nigel Quinton, John Wyllie

Officers Present: Shaun Dawson - Chief Executive
Stephen Wilkinson - Head of Planning & Strategic Partnerships
Beryl Foster - Assistant Director of Legal & Property
Lindsey Johnson - Committee Services Officer

Also Present: 1 Member of the Public

Part I

60 DECLARATIONS OF INTEREST

Name	Agenda Item No.	Nature of Interest	Prejudicial
Derrick Ashley	5	Executive Member for Environment & Planning at Hertfordshire County Council	Non-Pecuniary ✓
Derek Levy	9	Deputy Member for London Borough of Enfield	Non-Pecuniary and Non-Prejudicial
Gordon Nicholson	-	Member for Broxbourne Borough Council	Non-Pecuniary

61 MINUTES OF LAST MEETING

THAT the Minutes of the Regeneration & Planning Committee meeting held on 17 January 2019 be approved and signed.

62 PUBLIC SPEAKING

No requests from the public to speak or present petitions had been received for this meeting.

John Wyllie arrived during the next item.

REGENERATION & PLANNING COMMITTEE MINUTES 14 FEBRUARY 2019

70 GOVERNMENT CONSULTATION ON NET GAIN

Paper RP/29/19

The Head of Planning & Strategic Partnerships introduced the report informing Members that this report aims to leave the environment in a better state than beforehand after development. He also informed Members that biodiversity is difficult to measure as sites should not be seen in isolation as they can be part of an ecological network.

The Chairman expressed concern over the 10% increase in biodiversity and stated that he wouldn't want developers within 10 miles using the Park as amenity space.

The Chairman suggested inviting the minister, Rt Hon Michael Gove MP, to visit the Park in the summer and see our biodiversity and green spaces.

- (1) the response included in the draft letter at Appendix A to Paper RP/29/19 was approved.**

Frances Button arrived during the next item.

71 PLANNING CONSULTATION ON THE LONDON BOROUGH OF ENFIELD DRAFT LOCAL PLAN

Paper RP/30/19

The Head of Planning & Strategic Partnerships introduced the report.

A Member commented that east of the borough there is a green amenity corridor where access should be permeable. Picketts Lock in particular has terrible access and plans to improve it should be incorporated into the plan.

The Chairman of the Authority suggested that the letter should make reference to the new iconic facility which will be going ahead at Picketts Lock and how planning policies should be put in place to provide better access to it.

- (1) the comments included in the draft letter at Appendix A to Paper RP/30/19 be strengthened to include Members concerns around Picketts Lock with final wording to be agreed with the Chairman of the Regeneration & Planning Committee and Vice Chairman of the Authority was approved.**

72 EXEMPT ITEMS

THAT based on the principles of Section 100A (4) of the Local Government Act 1972, the public and press be excluded from the meeting for the items of business below on the grounds that they involve the likely disclosure of exempt information again on the principles as defined in those sections of Part I of Schedule 12A of the Act indicated:

Agenda Item No	Subject	Exempt Information Section Number
9	Planning Consultation by the London Borough of Enfield on the Draft Local Plan: Call for Sites	3

**REGENERATION & PLANNING COMMITTEE MINUTES
14 FEBRUARY 2019**

73 PLANNING CONSULTATION BY THE LONDON BOROUGH OF ENFIELD ON THE DRAFT LOCAL PLAN: CALL FOR SITES Paper RP/31/19

The Head of Planning & Strategic Partnerships introduced the report and Members discussed the sites identified in paragraphs 6-13 of Paper RP/31/19.

- (1) the inclusion of the sites identified in paragraphs 6-13 of Paper RP/31/19 was approved.**

Chairman

Date

The meeting started at 12.10pm and ended at 12.40pm.



LEE VALLEY REGIONAL PARK AUTHORITY

**REGENERATION AND PLANNING
COMMITTEE**

19 09 2019 AT 12:30

Agenda Item No:

5

Report No:

RP/34/19

**PLANNING CONSULTATION FROM EPPING FOREST
DISTRICT COUNCIL ON AN APPLICATION FOR THE CHANGE
OF USE AND CONVERSION OF EXISTING AGRICULTURAL
BUILDINGS TO CREATE 5 NEW DWELLINGS,
TEMPLE FARM, HIGH STREET, ROYDON, CM19 5LW**

Presented by the Policy Officer

SUMMARY

The application is for the partial change of use and conversion of two agricultural buildings to create five new dwellings at Temple Farm, Roydon.

Whilst it is recommended that no objection is made to the current application, in the event of permission being granted, planning conditions requiring the retention of existing boundary planting and the provision of new tree and shrub planting should be included in the decision letter.

RECOMMENDATIONS

- Members Approve:
- (1) in the event that planning permission is granted planning conditions be included in any final decision letter requiring:
 - a) the protection and retention of the existing tree and scrub belt along the southern boundary of the site;
 - b) a planting scheme to be provided, in consultation with the Authority, for the western boundary of the site incorporating native tree and shrub species; and
 - c) the incorporation of swallow nests and sparrow terraces as recommended in the ecology appraisal.

SITE AND APPLICATION DESCRIPTION

- 1 The application site lies to the west of Roydon village within the Green Belt. It forms part of a group of farm buildings some of which have already been converted into residential use. Vehicle access is provided via a farm track with an existing entrance onto the High Street. The farm buildings and the land surrounding these are part of 'Temple Farm Turkeys' a well-established agricultural use and business.
- 2 The agricultural buildings proposed for conversion are two large, modern breeze block and steel framed barns, grouped around an area of hardstanding and laid out along the western and southern boundary of the application site. They are currently used as part of the turkey farm business and for storage and machinery repairs. The northern most section of the barn situated on the western boundary has already been converted to residential use under permitted development rights. The current planning application seeks to convert the rest of the barn into four dwellings and make some amendments to the existing conversion. Private amenity space will be provided to the rear. The fifth dwelling is to be created by converting the western bay of the barn situated on the southern boundary.
- 3 Along the southern boundary of the application site there is a dense area of scrub and individual trees. Individual poplar trees also exist on an amenity lawn to the west, close to the part converted barn.
- 4 The application site is located just within the Regional Park, south of Roydon Station. It lies on the edge of an area of relatively strong rural character which contributes to the attractive landscape setting of the corridor of the River Stort and wider valley. Recreational routes such as the Three Forests Way public footpath, which passes alongside the north and western boundary and the Stort Valley Way draw people into and through this area of the Regional Park. The application site can be seen in the distance through gaps in the hedgerow planting bordering the Stort towpath.
- 5 **Planning Policy Context**
The National Planning Policy Framework confirms that development proposals for the reuse of existing buildings are not inappropriate in the Green Belt provided "they preserve its openness and do not conflict with the purpose of including land within it" and that the buildings are of permanent and substantial construction. Policy GB8A of the Epping Forest Local Plan (Combined Policies 2008) makes a similar point. It states that the Council will grant planning permission for the change of use and adaptation of a building in the Green Belt, provided a range of criteria are met, including that "the building is of permanent and substantial construction, capable of conversion without major or complete reconstruction", and that "the use would not have a materially greater impact than the present use on the Green Belt and the purpose of including land in it".
- 6 PDF proposals relevant to this area of the Park and the application site are found under 7.A.3 Wetland Park Central and North: Glen Faba and Roydon. These identify Roydon Station as a secondary gateway into the Park and are focused on promoting and improving links and circular walks connected with existing public footpaths, Roydon village and the station. Landscape proposals identify the application site as being included in the Roydon Park LCA G2. They seek to conserve the predominantly rural character of the area and its landscape setting to the valley and Roydon, and seek to promote growth of new

generations of mature trees. Environment proposals identify the importance of supporting the continued agricultural use of land and working with landowners to maintain and improve public rights of way and improve ecological value of the land.

PLANNING APPRAISAL

- 7 The proposed conversion of the barns will not involve any enlargement or extension of the existing buildings. The external alterations would include timber cladding and the blocking up of a number of large agricultural style openings and the insertion of new windows and doors of a more domestic scale and appearance. The proposal is acceptable in that it would not constitute inappropriate development in the Green Belt.
- 8 The applicant has carried out an arboricultural survey and ecological appraisal of the site and buildings. It is proposed to retain the tree and shrub belt around the southern boundary of the site and remove three trees on the western edge of the site, due to their low quality and likely dominance in the proposed garden setting. The arboricultural survey has concluded that the application scheme presents an opportunity to plant new trees and shrubs that would be more suited to the site and offer better amenity and wildlife benefit.
- 9 The ecology appraisal found the site to be of low ecological value with a few bird nests found. The report has outlined best practice methodology regarding the timing of works in relation to nesting birds and this will need to be adhered to. It proposed that enhancement measures such as swallow nests and sparrow terraces be incorporated into the development.
- 10 Although the character of the barns will change to a more domestic appearance this is unlikely to impact on the Regional Park. These changes will be visible from the adjacent public footpath and in the more distant views from the towpath, presenting a more 'tidy' appearance to the barns within the existing farm complex. On the southern boundary the existing tree and shrub habitat will shield views from the wider Park area.
- 11 The Authority would therefore support the Council in applying a condition to any permission that requires:
 - a) the protection and retention of the existing tree and scrub belt along the southern boundary of the site;
 - b) a planting scheme for the western boundary of the site incorporating native tree and shrub species; and
 - c) incorporation of swallow nests and sparrow terraces as recommended in the ecology appraisal.

These measures will help to compensate for the trees that need to be removed and provide opportunities for improving wildlife habitat. Officers would wish to be consulted on the detail of new planting along the western boundary.

ENVIRONMENTAL IMPLICATIONS

- 12 Environmental implications are addressed in the body of this report.

FINANCIAL IMPLICATIONS

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

LEGAL IMPLICATIONS

- 14 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.
- 15 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

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

EQUALITY IMPLICATIONS

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

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BACKGROUND REPORTS

Application Papers 19.073

August 2019

APPENDICES ATTACHED

Appendix A Site Plan



- Park Boundary
- Site Boundary
- Bams proposed for conversion

Proposed change of use and conversion, Temple Farm, Roydon



1:2500 @ A4
11.09.19

Produced by: Corporate GIS (AAB)
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LEE VALLEY REGIONAL PARK AUTHORITY

**REGENERATION AND PLANNING
COMMITTEE**

19 09 2019 AT 12:30

Agenda Item No:

6

Report No:

RP/33/19

**PLANNING CONSULTATION BY THE BOROUGH OF ENFIELD
ON TWO APPLICATIONS, A FULL APPLICATION FOR
STRATEGIC INFRASTRUCTURE WORKS AND AN OUTLINE
APPLICATION FOR A MIXED USE RESIDENTIAL LED
DEVELOPMENT BOTH RELATING TO MERIDIAN WATER**

Presented by Policy Officer

SUMMARY

These linked applications seek to bring forward the next phase of major development within the Meridian Water master plan area. Strategic infrastructure works are required across the site to enable new development to progress, to provide for site remediation, flood alleviation, green infrastructure and the construction of new roads, bridges, and services. The outline application for Meridian Water Phase 2 is for a mixed-use residential scheme including 2,300 dwellings, a hotel, offices, shops a primary school and areas of open space and play areas.

The Authority has been involved with and supported the Meridian Water regeneration planning process for a number of years. The Park Development Framework Area proposals are clear in terms of the improvements this scale of regeneration could achieve for the Regional Park. The proposals are considered in detail in the body of the report below. The creation of Edmonton Marshes- a new publically accessible park, is the most significant element of the proposed development. It would open up a new section of the Regional Park for recreation and leisure whilst also creating new habitats and areas of ecological interest and is to be supported.

The new access links, east west into the Regional Park, and to the south with Tottenham Marshes are also supported and will enhance connectivity for pedestrians and cyclists.

The Parameter Plans and Design Code provide a good level of guidance for the reserved matters applications that will need to come forward for the detail of development within Phase 2. The Authority will need to be consulted on those areas and development plots that lie in close proximity to the Park at Tottenham Marshes and along the western side of the River Lee Navigation in order to protect the amenity, ecology and enjoyment of the Regional Park.

RECOMMENDATIONS

Members Approve:

- (1) the Authority welcomes the application for Meridian Water Strategic Infrastructure Works (MWSIW), and supports the creation of Edmonton Marshes within the Regional Park. Reassurances are sought that:
 - a) the Lee Valley Biodiversity Action Plan will be taken into account in the detailed design and the choice and creation of habitats within Edmonton Marshes;
 - b) options to improve access connections between Edmonton Marshes and land within the Park to the north of the North Circular, are included at this stage as part of the Design and Access statement even if delivery forms part of a later phase of development; and
 - c) the Authority is involved in further detailed planning and delivery of the proposed link between the southern end of Brooks Park and Tottenham Marshes to ensure an appropriate and attractive treatment of the access between the two areas.
- (2) the Authority would wish to be involved with and consulted on:
 - a) any bespoke lighting solution for the River Lee Navigation and River Lee Navigation Bridge to ensure the design and use of lighting takes account of the need to mitigate impacts on habitats, and the foraging and commuting routes used by wildlife, in particular along the Lee Navigation corridor;
 - b) details for the provision of access along the waterways within the Park, particularly where this is on both sides of the watercourse;
 - c) provision for Water Voles and Otter along the waterways within the development site, for example development of a few protected otter holts, consideration to Otter movement given during the construction of any new river crossings and the linking marginal vegetation for Water Voles. Further discussion between

the Authority and the Council would be welcome on these matters;

- d) clarification is also sought as to the management of the waterways within the new park Edmonton Marshes and the wider Meridian Water development so as to ensure water quality is maintained and enhanced; and
- (3) in respect of the Meridian Water Phase 2 outline application the Authority wishes to be consulted on the Reserved Matters Applications for:
- a) the development plots that lie adjacent or close to the Park boundary on the western side of the River Lee Navigation including provision of a 'riverside' path; and
 - b) development plots to the north of Tottenham Marshes in order to safeguard the amenity, ecology and enjoyment of the Park.

Informative: Officers would welcome further discussion on the matters raised above.

BACKGROUND

1 Introduction

Meridian Water is a major mixed use regeneration scheme comprising 85 ha of land in Upper Edmonton, Enfield. It lies close to the A406 North Circular and the IKEA and Tesco stores and is currently a mix of commercial and industrial uses although much of the site is now vacant. Previous land uses such as gas works, chemical and engineering works have resulted in widespread ground contamination.

- 2 The regeneration scheme will bring forward land for redevelopment in phases over the next 20 years. Meridian Water Station which sits on the West Anglia Main Line, opened in June 2019 and the first phase of housing for 725 dwellings next to the station known as 'Meridian One' has been granted planning permission. The current applications; the Meridian Water Strategic Infrastructure Works (MWSIW) and the Meridian Water Phase 2 (MWP2) mixed-use residential led development represent the next phases of development.

3 Location

The applications cover an area of Meridian Water broadly bounded by the A406 North Circular to the north, River Lee Diversion/Flood Relief Channel to the east, Leaside Road and Tottenham Marshes to the south and A1055 Angel Edmonton Road (Meridian Way) to the west. The MWSIW application is approximately 30.4 ha and includes land within the Regional Park to the east, which lies south of the A406 North Circular. The Plan at Appendix A to this report shows the location of the two applications.

- 4 The linear route of the River Lee Navigation and towpath that pass through the middle of this site are also part of the Regional Park creating a link between Tottenham Marshes in the south and the rest of the Park north of the A406. The Lee Navigation forms the eastern boundary of proposed residential scheme MWP2, which is bounded to the west by the Salmons and Pymmes Brooks.
- 5 To the south east of the application sites lies Banbury Reservoir also within the Park and approximately 1km away are the Walthamstow Wetlands, a designated Site of Special Scientific Interest (SSSI) and part of the Lee Valley SPA and Ramsar site. Located to the north, beyond the A406 are the Eley Industrial Estate, Edmonton Eco Park and land within the Park south of Pickett's Lock.
- 6 The Authority owns a small area of land, situated between Harbet Road and the North Circular that lies within the application site for the Strategic Infrastructure Works. Please refer to the Plan at Appendix B to this report. The freehold interest of this land was acquired from the Greater London Council (GLC) in August 1975 for the cost of £5,000. It was acquired with a restrictive covenant placed on the title by the GLC for it to be laid out and used as open space. It is also burdened by easements for overhead electricity cables in favour of National Grid. Parts of the Authority's title have been affected by a Compulsory Purchase Order for junction improvements to the A406 carried out in the 1980s with land removed from the original title by the acquiring Highways Authority for this purpose.

Earlier on in the year, agents acting on behalf of London Borough of Enfield (LBE) approached the Authority to discuss this area of land as the LBE had confirmed at Cabinet level and externally to key stakeholders including the Greater London Authority its intention to deliver key elements of infrastructure early in the delivery programme for Meridian Water. This land owned by the Authority on the South Side of the North Circular Road has been confirmed as required for infrastructure works. Specifically, the land is required for flood alleviation, earthworks, utilities infrastructure and landscaping. Whilst an initial offer has been put forward for officers of the Authority to consider, discussions are still in the very early stages.

- 7 The London Borough of Enfield is leading on the regeneration of Meridian Water and is the applicant for these proposals. It has invested significant resources in land assembly, remediation and infrastructure and recently selected a development partner Galliford Try Partnerships, to take forward the first phase of development 'Meridian One'.

DESCRIPTION OF THE PROPOSED SCHEMES

- 8 The Meridian Water Strategic Infrastructure Works and Phase 2 development are linked applications. They have been submitted in tandem and have a number of interrelationships. As such they share a number of planning documents, including an Environmental Statement, Design and Access statement, Flood Risk Assessment, Habitats Regulation Assessment, and Remediation Baseline and Framework (relating to ground contamination).
- 9 **Strategic Infrastructure Works (MWSIW) Application**
Strategic Infrastructure Works are required to enable future residential led development of Meridian Water. Full permission is sought for the following elements:

- the Central Spine Road, described as a new tree-lined boulevard that will connect Glover Drive and Meridian Station in the west to Harbet Rd in the east. It will cross the Pymmes and Salmon Brooks and the River Lee Navigation.
- Leaside Link Rd – which will link through to the Central Spine Road.
- Bridges (x4) needed to enable the two new roads above to span Pymmes and Salmon Brooks and the River Lee Navigation.
- Pymmes Brook naturalisation to include creation of a riverside parkland; 'Brooks Park'.
- Edmonton Marshes and Flood Alleviation Works - including re-levelling and remediation of land to the east of Harbet Rd, and creation of new high quality public open space within the Regional Park.
- Access works, earth works, remediation, utilities and other ancillary works.

The key components of the MWSIW as regards the Regional Park are described in more detail below. Appendix D to this report is an illustration of the key components extracted from the Environmental Statement.

- 10 **The Central Spine Rd** will form a new junction with Glover Drive in the west and then extend eastwards over the Pymmes and Salmons brooks between Zones 4 and 5 to cross the River Lee Navigation Bridge. East of the Navigation access will be limited to bus only. The road will continue to link with Harbet Rd and enable access for pedestrians and cyclists to Edmonton Marshes.
- 11 **The River Lee Navigation Bridge B1** carries the Central Spine Rd over the River Lee Navigation and has a span of 33m. Its abutments are set back on each side to allow for an 8m wide towpath on the east bank (the current towpath) which accommodates both a footway and cycle track and a 5m towpath on the west bank (just footway) with adequate headroom (3.1m minimum) for pedestrians and mounted cyclists. Access to the existing towpath will be maintained and will be via a staircase on the northern edge of the bridge and a ramp on the southern edge. A staircase will be formed on the south-west edge of the bridge providing access to a future canal side path on the western side.
- 12 The structure is proposed to be a steel composite box girder bridge and has been designed to tie in with the design of the newly opened Meridian Water station. As such the underside of the bridge will have striking bronze faceted beams that are inspired by the gold station ceiling soffit, with abutments of smoked grey brick, using a similar palette to the new station building. Street lighting over the bridge is to be provided by a series of floor mounted lighting columns positioned between the cycle path and carriageway and wall mounted lighting will be used below the bridge.
- 13 **Edmonton Marshes and Flood Alleviation Works** - Land within the Regional Park is to be excavated to provide necessary flood compensation and material for use elsewhere within the site. The modified landscape of the flood compensation 'area' will create a new public 'park' Edmonton Marshes. This will provide an area of 6.4ha laid out as a series of different sunken spaces and habitat; woodland, grasslands and seasonal wet meadows, and incorporate a network of public footpaths, boardwalks, seating and areas of hardstanding. Park entrances will be formed on Harbet Road. It is not proposed to light the park at night.

- 14 As part of the drainage strategy for the development a Flood Conveyance Channel will be required to transport flood waters from the River Lee Navigation to Edmonton Marshes. Floodwater from Edmonton Marshes will then be drained into the River Lee Flood Relief Channel. The storage on Edmonton Marshes will compensate for the reduction in flood storage lost through the raising of development plots within development zones 4 and 5 above flood levels and remediate contaminated land.
- 15 Other flood attenuation works include the part naturalisation of Pymmes Brook, immediately north of the Regional Park boundary at Tottenham Marshes, to create Brooks Park. The design for this park includes pedestrian and cycle links into the path network at Tottenham Marshes.
- 16 Phasing of works will depend on the varying availability of vacant possession of land parcels to enable works to commence. A start date of May 2020 is proposed with earth works and remediation in the Regional Park planned for a 2021 start. The phasing programme indicates that works will continue until mid-2023.
- 17 **Meridian Water Phase 2 (MWP2) Application**
The Meridian Water Phase 2 outline application seeks comprehensive redevelopment of zones 4 and 5 (see Appendix C to this report) and part of Zone 2 for the following:
 - Up to 2,300 new homes with 40% affordable.
 - A hotel circa 250 rooms.
 - Option for purpose built student accommodation and/or large scale purpose built shared living.
 - 26,500sqm of commercial development and up to 2,000sq m of retail.
 - Up to 5,500sq m of social infrastructure, e.g. gym, nurseries, library, education and training facilities, community floor space, art galleries.
 - A three form entry primary school (up to 630 pupils) with associated outdoor recreational space.
 - Associated works and landscaping to create new public open spaces (2.43 ha), SUDs, car parking and new pedestrian and vehicular access, including a new towpath along the western bank of the Lee Navigation connected to Tottenham Marshes.
- 18 The outline application is submitted with all matters reserved, this allows for the principle of the proposed development to be established and the necessary flexibility for the development of detailed design as part of a phased delivery. This means that access, appearance, landscaping, layout and scale are all for future determination. A set of Parameter Plans and a comprehensive Design Code are included as part of the outline application. These documents will control the future reserved matters applications and the quality of the development. They show the spatial organisation of the site and predominant distribution of different land uses at ground and upper floor levels.
- 19 Development plots are laid out between the newly formed Brooks Park and Salmon's brook in the west and the Lee Navigation on the eastern boundary. The Central Spine road crosses from east to west in the northern portion of the site and the Leaside Link road enters the site from the south before heading north. Plots located between this road and the Navigation are described as the 'Eastern' plots overlooking the 'Riverside' and range in height from 9 to 15 storeys along the canal frontage, to between 5 and 16 storeys at the southern

end of the site, where two development plots are shown set back from but overlooking Tottenham Marshes. A riverside path or towpath is to be included along the western bank of the River Lee Navigation connected to Tottenham Marshes in the south of the site. Indicative phasing of development across the site is set out starting late 2021 through to 2031

- 20 A strategy to reduce the risk from previous land contamination across the site has been prepared as part of the Environmental Statement. This includes the approach to and options for ground contamination investigation, assessment and remediation works, including the removal of contaminated material and the placement of covers or barriers over contaminated areas. It also sets out an approach to dealing with non-native invasive plant species.
- 21 The Ecology chapter of the Environmental Statement submitted with the applications takes account of existing habitats and potential ecological effects of the proposed developments, assessing the schemes against baseline conditions. It concludes that the proposals will cause no likely significant adverse effects relating to ecology, including statutory designated sites such as Lee Valley SPA and Ramsar and also non-statutory sites such as the Lee Valley Site of Metropolitan Importance for Nature Conservation (SMINC). The assessment finds that the proposed developments will result in significant biodiversity net gain reflecting the multiple benefits of the natural approach to flood management and the associated habitat creation.
- 22 **Section 106 Agreements**
The Planning Statement submitted with this application explains the position in respect of any section 106 agreement. The Council as the landowner and applicant cannot enter into a section 106 agreement or obligation with itself in relation to the MWP2 development. A Grampian condition is therefore proposed requiring the completion of the S106 Agreement by developers appointed at a future date. It is also the case that the infrastructure works will provide enabling development for the MWP2 proposals. As some of these works will be a pre-requisite for the delivery of the MWP2 proposals it is proposed that the delivery of these works is also bound by a Grampian condition or planning obligation.

POLICY CONTEXT

- 23 **London Plan**
Meridian Water sits within the Upper Lee Valley Opportunity Area (ULVOA) identified in Policy 2.13 of the adopted London Plan 2016. The ULVOA Planning Framework was adopted by the Mayor in July 2013 as Supplementary Planning Guidance and this identifies growth at Meridian Water as one of eight key objectives of the OAPF. It sets out guiding principles for development of Meridian Water and highlights objectives of improving transport connectivity, delivering sustainability across the area and improving health and lifestyles particularly through improved green space. In particular, it highlights the need to open up connectivity east-west within and beyond the application sites to provide greater access to surrounding communities and the nearby Lee Valley Regional Park.
- 24 **Local Plan**
The Meridian Water concept is well established and supported by the London Borough of Enfield's local planning policy documents (Core Strategy 2010 and DMD 2014), the Meridian Water Masterplan 2013 and the Edmonton Leaside Area Action Plan (post Examination modification stage May 2019) which sets

out the Council's aspirations to deliver over 5,000 homes and 1,500 jobs.

25 The Authority has engaged with the London Borough of Enfield on the various stages of the Meridian Water planning process over a number of years and has generally been supportive. It is recognised that development and regeneration at this scale has the potential to unlock and enhance inaccessible areas of the Park and enable them to contribute to the leisure, recreational and ecological remit of the Park.

26 **Park Development Framework**

Park Development Framework (PDF) Area 4 Proposals 'The Waterlands: Banbury Reservoir to Pickett's Lock' recognise the opportunities for land restoration, creation of new habitats and improved public access on land south of the North Circular linked to the development proposed as part of the Meridian Water masterplan. Proposals under 4.A.2 seek the following:

- **Visitors** - new green and pedestrian and cycle links between the Park and Meridian Water, including provision of a new bridge over the River Lee Navigation;
- retention and enhancement of the River Lee Navigation as a key public waterside route and wildlife corridor linking Tottenham Marshes with the Park area south of William Girling Reservoir;
- activation of the water front with cafes restaurants and creation of waterside open space;
- under **Sport & Recreation** proposals seek to explore options for recreational and formal sports use of land to the north and south of the North Circular as a comprehensive scheme to open up these areas for public leisure complementary to the creation of new habitats;
- **Biodiversity** proposals seek – remediation of land both sides of the North Circular to include habitat creation to strengthen ecological connectivity between the reservoir Site of Special Scientific Interest, the waterway and open grassland habitat on Tottenham Marshes. New waterside space proposed alongside the River Lee Navigation in the Meridian Water Masterplan should include appropriate waterside habitat creation to aid establishment of an ecological corridor;
- South of the North Circular options to naturalise the western bank of the River Lee Diversion and create new habitats should be explored;
- **Community** proposal identify public recreational and leisure use of land south of the North Circular to complement and link into new community open space provision delivered through the Meridian Water development; and
- **Landscape** proposals seek the restoration of poor quality and fragmented landscape character, protecting and enhancing the openness of the valley floor to the north and south of the North Circular.

PLANNING APPRAISAL

27 Principle of Development

The principle of regeneration and development within the Meridian Water area is supported, in line with the existing local plan policy and the Authority's PDF Area Proposals. The majority of development proposed under the two applications will take place outside the main Park boundary, although the infrastructure works will impact upon the River Lee Navigation and a large area of inaccessible green belt land in the Park, south of the north circular, a small part of which is owned by the Authority. The proposed residential led mixed use development will border the northern edge of Tottenham Marsh and the western edge of the Navigation.

28 In this respect the Design Code and parameter plans are key documents. They provide the framework to enable detailed design to be undertaken in a consistent manner and address matters of relevance for the Authority in terms of how the proposed development will impact upon the Park across the phases of delivery. The Reserved Matters Applications (RMAs) will be expected to come forward in compliance with the design principles established in this Design Code and the spatial arrangement included in the parameter plans.

29 The Infrastructure Works

Provision of the **Central Spine Road**, also described as Bridge Street and the Lee Navigation Bridge accords with the PDF Area Proposals. They are key components in terms of opening up east-west access across the Meridian Water site and linking it into the Regional Park. These works will include cycle and pedestrian routes, separated from vehicular traffic and will link through to the Meridian Water station in the west and the Edmonton Marshes in the east. The new junction with Harbet Road will prioritise the connection to Edmonton Marshes for pedestrians and cyclists, acting as a gateway to the new park. The design details for the road show an attractive green streetscape incorporating soft landscaping, tree planting and street furniture.

30 The **Lee Navigation Bridge** is a substantial structure and has a bold high quality design that celebrates its position linking the new development with Edmonton Marshes and the Regional Park. The design incorporates ramped and stepped access between the towpath (within the Regional Park) and cycle Route NC1. It will also provide a seating area and views out across the Meridian Water site. At towpath level tree planting, landscaping and seating are also proposed. These measures will enhance pedestrian and cycle access into the Park and help to connect the north south towpath route into an east-west network that also links with public transport. These are measures the Authority has identified in the Area Proposals and are supported.

31 There is however an area of concern in relation to the interface with the canal side and the impacts on waterside ecological habitat. This arises in relation to lighting which is proposed both on and under the bridge. The Design Code includes guidance on lighting and identifies the River Lee Navigation as a sensitive habitat in this regard. In these cases, any Lighting Strategy must ensure that there is no direct lighting of watercourses and associated riparian habitat, and have particular regard to best practice standards including the Bat Conservation Trust Guidance Note on Bats and artificial lighting in the UK 2018. The Design Code also states however that lighting should illuminate routes adjacent to the River Lee Navigation.

- 32 A later section in the Code Section 6.1.10 Biodiversity states that a bespoke solution will need to be developed *“where low level lighting of the public realm is required for safety such as on the River Lee Navigation edge or where public routes pass under bridges that require lighting such as the bridge over the River Lee Navigation”*.
- 33 The Authority would wish to be consulted on the bespoke solution for the River Lee Navigation in order to ensure the design and use of lighting takes account of the need to mitigate impacts on habitats, and the foraging and commuting routes used by wildlife, in particular along the Lee Navigation corridor. It will be important to provide dark areas for foraging and commuting wildlife.
- 34 There is also a more general point of concern about opening up access along both sides of the river unless there is a suitable buffer to the waters edge and work to naturalise and soften the hard edges included. This may apply to other waterways within the application sites. Officers would wish to be consulted on the details of access along the waterways within the Park.
- 35 Water Voles and Otter are known to be present both up and downstream of the Meridian Water development, so the proposals here will provide an important stepping stone for their passage. It is not clear from the various supporting documents whether any provision has been made for Water Voles and Otter along the waterways within the development site. Officers would like to see the development of a few protected otter holts as a part of the development plans. Consideration to Otter movement should also be given during the construction of any new river crossings and linking marginal vegetation will be particularly important for Water Voles. Further discussion between the Authority and the Council would be welcome on these matters.
- 36 **Edmonton Marshes** is the most significant element of the proposed development in terms of the Regional Park. The Design and Access Statement provides a detailed design strategy for the creation of this dual purpose open space – a new publically accessible park that also functions as flood alleviation for the wider development. The transformation of this area of the Park and the establishment of new parkland would be a major achievement resulting from the development.
- 37 It would open up a new section of the Regional Park for recreation and leisure whilst also creating new habitats and areas of ecological interest. The PDF Area proposals under Biodiversity seek remediation of land on both sides of the North Circular and Edmonton Marshes will achieve this for the land to the south. It is important in this respect, that the reference points for habitat creation within Edmonton Marshes include the Authority’s recently adopted Biodiversity Action Plan. This would enable the new park to complement the wider biodiversity of the Regional Park and strengthen ecological connectivity with those areas of the Park to the north and south. Edmonton Marshes is to remain unlit at night and this should benefit wildlife and reduce disturbance. Officers of the Authority would be happy to meet with Council officers to discuss how best to integrate the development into the wider ecological landscape of the valley.
- 38 It should be noted that the Design & Access Statement provides for the park to be retained and managed by Meridian Water Estate Management entity or Enfield Council’s Parks’ department. It would be helpful if clarification as to the management of the waterways within the park and the wider Meridian Water

development could be provided so as to ensure water quality is maintained and enhanced.

- 39 The Design and Access statement knits the Edmonton Marshes into the wider site to the west with pedestrian, cycle and bus routes all connecting through. A series of access points are provided from Harbet Road and access within the park is also well provided for with a network of primary and secondary paths. North-south connections into the park for pedestrians and cyclists i.e. between the park and the Regional Park are not so clear.
- 40 A new path is shown alongside the River Lee Diversion which runs along the eastern boundary of the park from north to south. Importantly this incorporates a green vegetated buffer between the path and the water which will act as a wildlife corridor. It is hoped that future phases of the Meridian Water scheme will enable this path to be continued south following the River Lee Diversion alongside the northern boundary of Banbury Reservoir to link into Tottenham Marshes. PDF Visitor Proposals include a proposal for this connection.
- 41 Connections to the north will also need to be addressed, and should be considered within the Design and Access statement even if delivery might not be possible at this stage. It is understood that land north of the North Circular within the Regional Park is owned by Thames Water and currently part of the set down area for redevelopment of Edmonton Eco-park. Further to the north lies Pickett's Lock and the Lee Valley Athletic Centre. Connections through to these significant leisure and sporting community facilities should be considered as part of wider impact of Meridian Water. This falls within the scope of the Edmonton Leaside Area Action Plan (AAP).
- 42 **The Meridian Water Phase 2 outline application**
The Phase 2 development will lie adjacent to the western edge of the River Lee Navigation and border the Park along the northern boundary of Tottenham Marshes. Within the development scheme it is the 'eastern blocks' that will front and overlook the River Lee Navigation or 'riverside' as it is described.
- 43 PDF Area Proposals have identified the importance of activating the water front along the Navigation with visitor friendly uses such as cafes, restaurants and waterside open space. The Parameter Plans indicate the range of possible uses for the various plots and this allows for flexible ground floors with a mix of retail, commercial and social use with residential above. Importantly given the range in the height of each block the Design Code seeks to break up the massing of the riverside blocks and ensure a varied height between adjacent blocks. Detailed guidance on tall buildings is provided in recognition that these plots are addressing the Navigation and should therefore create an openness to the Riverside Path.
- 44 The Authority should be consulted on the reserved matters applications for these plots and the execution of the Riverside path. The concern is to ensure, in accordance with the PDF Area proposals, that the activation of waterside space allows sufficient room to accommodate appropriate waterside habitat creation to aid establishment of an ecological corridor. The towpath is already established along the eastern side of the Navigation so the balancing of the various uses with habitat creation will require careful planning and implementation. This is important given the proposed Riverside Path is to link into Tottenham Marshes.

- 45 The Authority would also wish to be consulted on further detail for the treatment of land immediately north of Tottenham Marshes and along the boundary between the two areas. The two development plots within Phase 2 are set well back from the Park boundary and the illustrative public realm plan indicates a mix of open space use including sports pitches potentially associated with the new school. Other plans indicate 'meanwhile uses'. It will be important to secure a use and design that complements the Park and the openness of the Marshes.
- 46 This would need to be considered in association with the design for the southern end of Brooks Park, which indicates direct pedestrian and cycle links with Tottenham Marshes. The Authority will need to be involved in the further detailed planning and delivery of this proposed link to ensure an attractive access treatment between the two areas.
- 47 **Section 106 Obligations**
The proposed development will secure major improvements to the Regional Park potentially at no cost to the Authority, most notably the creation of Edmonton Marshes and the provision of new pedestrian and cycle routes and links into the Park. There will also be a biodiversity net gain due to the approach to flood management and habitat creation.
- 48 The consultation process for the Reserved Matters applications in relation to MWP2 will enable the Authority to seek S106 monies from the developer appointed at a future date, for any necessary improvements within Tottenham Marshes in order to secure an appropriate boundary treatment with the development immediately adjoining. Access from Brooks Park into Tottenham Marshes will need to be agreed with the Authority. Future development phases may unlock the opportunity to create other links into the Park to north and south, for example along the River Lee Diversion north of Banbury Reservoir.

ENVIRONMENTAL IMPLICATIONS

- 49 These are addressed in the body of the report.

FINANCIAL IMPLICATIONS

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

LEGAL IMPLICATIONS

- 51 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.
- 52 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

- 53 There are no risk management implications arising directly from the

recommendations in this report.

EQUALITY IMPLICATIONS

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

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BACKGROUND REPORTS

Application Papers 19.077 and 19.078

August 2019

APPENDICES ATTACHED

Appendix A	Plan of the application sites
Appendix B	Land in Authority ownership adjacent to Harbet Road
Appendix C	Meridian Water Development Zones
Appendix D	Illustrative layout of key components subject of the applications

LIST OF ABBREVIATIONS

SSSI	Site of Special Scientific Interest
MWSIW	Meridian Water Strategic Infrastructure Works
MWP2	Meridian Water Phase 2
GLC	Greater London Council
LBE	London Borough of Enfield
ULVOA	Upper Lee Valley Opportunity Area
SMINC	Site Metropolitan Importance for Nature Conservation
PDF	Park Development Framework
RMA	Reserved Matters Applications
AAP	Area Action Plan

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Meridian Water Development Applications, Enfield

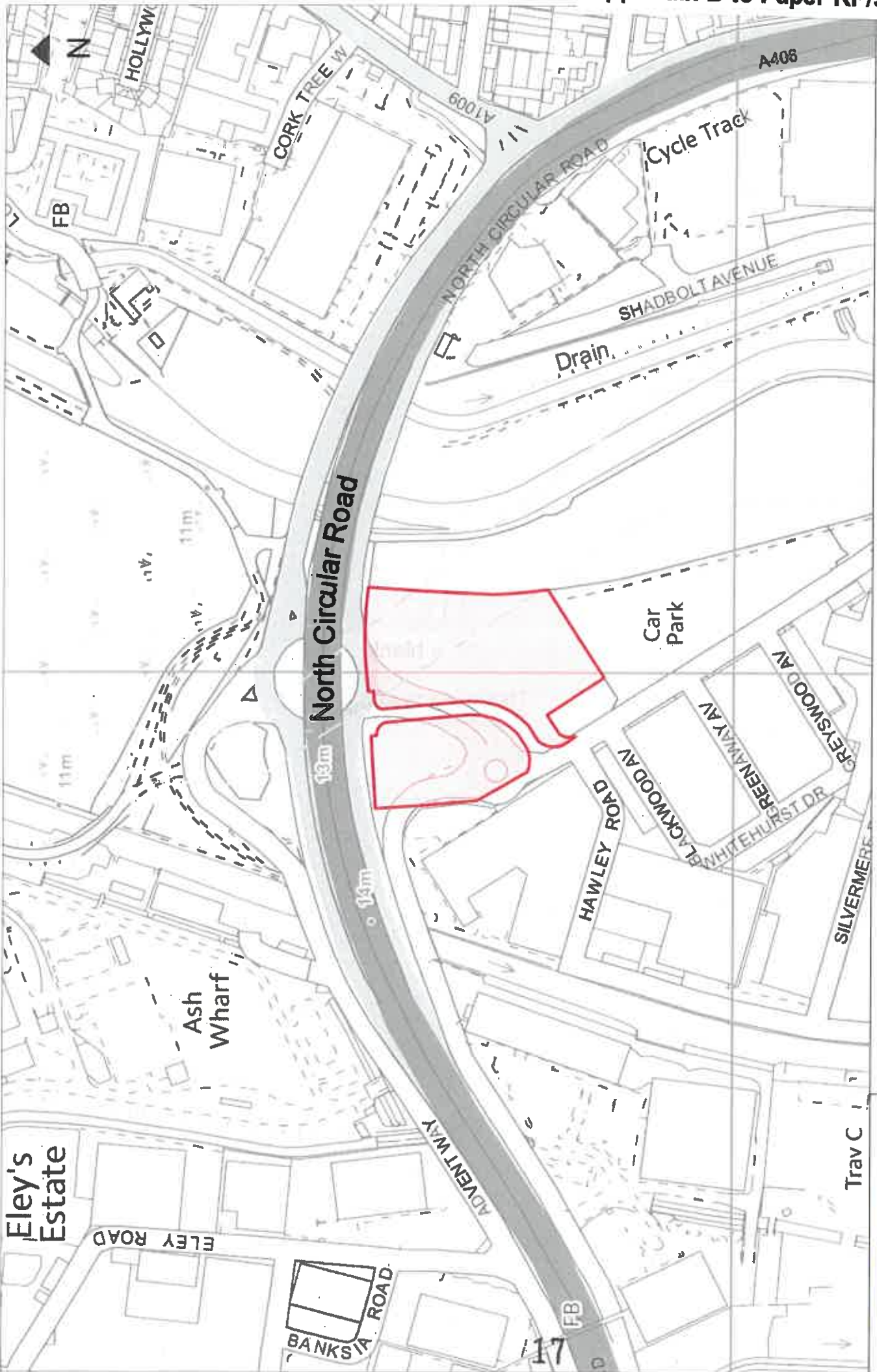
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Site Boundary



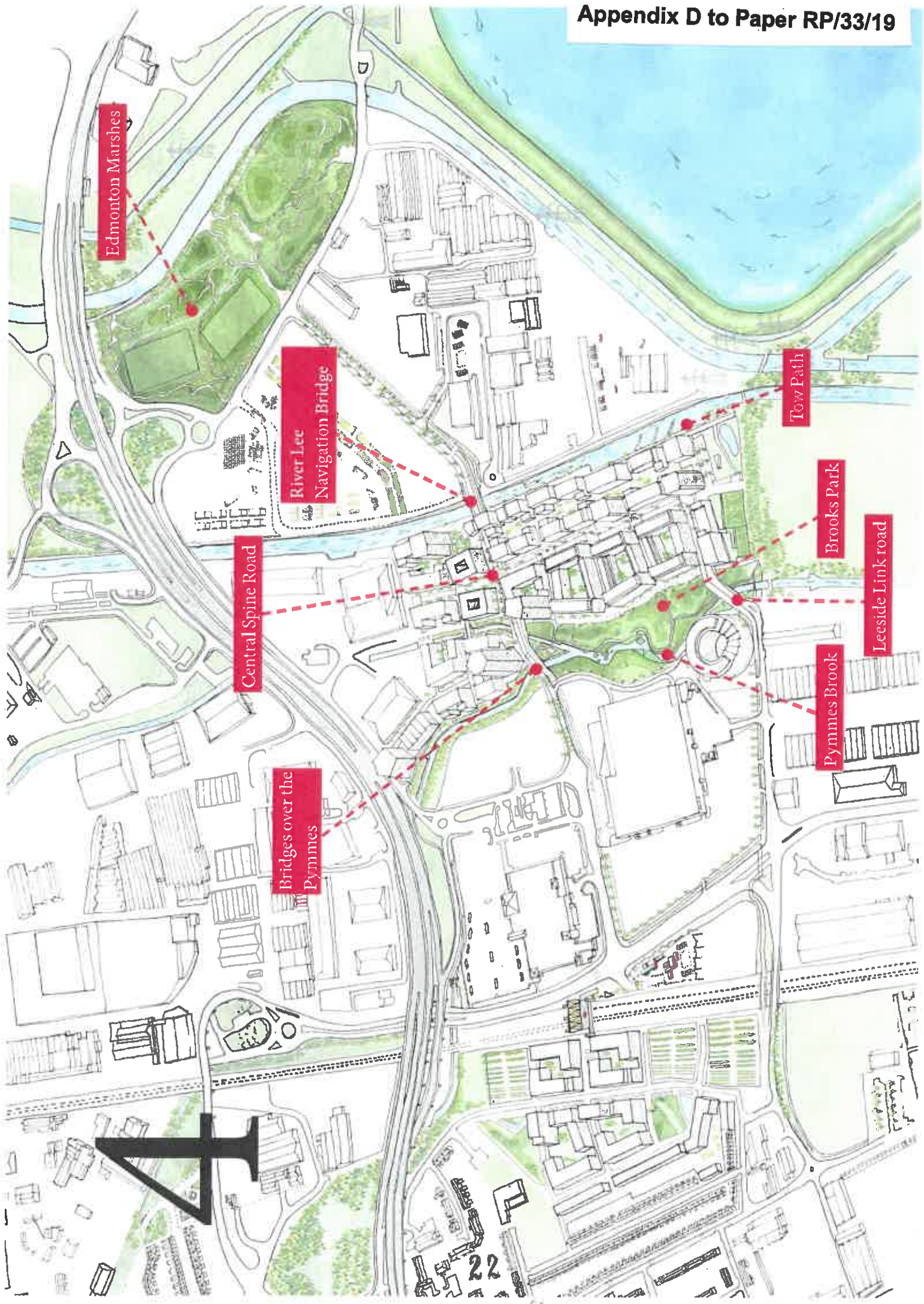
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Regional Park Authority

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Meridian Water Development Zones



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Edmonton Marshes

River Lee Navigation Bridge

Central Spine Road

Bridges over the Pymmes

Tow Path

Brooks Park

Leeside Link road

Pymmes Brook

A

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LEE VALLEY REGIONAL PARK AUTHORITY

**REGENERATION AND PLANNING
COMMITTEE**

19.09.2019 AT 12:30

Agenda Item No:

7

Report No:

RP/32/19

**LONDON BOROUGH OF WALTHAM FOREST LOCAL PLAN
REGULATION 18 CONSULTATION DOCUMENT**

Presented by the Policy Officer.

SUMMARY

London Borough of Waltham Forest are consulting on their Regulation 18 draft Local Plan 2020-2035 which is intended to shape and manage good growth, development and regeneration across the borough over the next 15 years.

The Authority responded to the earlier Direction of Travel consultation in 2017 and also to the accompanying 'call for sites', proposing two sites for consideration; the Waterworks building and car park, and the western portion of the Ice Centre car park. This process is still open and will be informed by the Green Belt review currently in hand.

Since 2015 Officers of the Authority have been working closely with the Council on a major project within the Borough on proposals to redevelop the Ice Centre and create a new twin-pad rink ice skating destination.

Comments on the current consultation are set out in the letter attached as Appendix A to this report. Whilst the draft Plan includes a number of positive policies in relation to the Park further discussion is required with officers under the Duty to Co-operate process to cover the Green Belt review currently underway, the outcome of the Call for Sites process and the detail of Local Plan policy in relation to the Authority's major venues and visitor facilities.

RECOMMENDATIONS

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 the draft Local Plan 2020 – 2035.

BACKGROUND

- 1** Waltham Forest is a relatively small borough at 3,880 ha in area. Approximately 27% is Green Belt or Metropolitan Open Land (MOL) concentrated on the western side. Figures set out in the draft Local Plan indicate it is also a rapidly growing and diverse borough with an increase in residents of 20% over the last decade and a 35% growth in the number of businesses since 2012.
- 2** A large area of the Regional Park (over 500ha) and several venues fall within the London Borough of Waltham Forest. These include 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, 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 Regional Park forms both a substantial green infrastructure resource and a major leisure and sporting attraction for the Borough's residents. In 2018/19 approximately 379,905 visits were made to the Authority's venues and parklands in the Borough by Waltham Forest residents. This figure does not include visits to other facilities within the Park including driving ranges, rugby clubs and the 400 acre Walthamstow Wetlands.
- 4** The Authority has adopted detailed proposals for those areas of the Regional Park which lie in the Borough through the Park Development Framework Area Proposals. Five sets of Area Proposals are relevant given the extent of 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.
- 5** The Authority's major investment project for the 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 are well advanced and a number of the pre-application requirements on the design and content of the proposal have been undertaken in consultation with officers from the Council. Public consultation and a series of exhibition events took place throughout July and August. Submission of the planning application is programmed for October.
- 6** In January 2017(Paper A/4238/17) in response to the Council's draft vision for the 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 venue 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.
- 7** The Authority responded in detail to the previous round of consultation on the draft Local Plan – the 'Direction of Travel' document in December 2017 (Paper RP/11/17) 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 Ice Centre car park.

- 8 Comments received from this consultation will inform the Proposed Submission Plan which will be consulted upon in Spring 2020. 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.

THE DRAFT LOCAL PLAN

- 9 The content of the draft Local Plan builds upon the Direction of Travel consultation work undertaken in late 2017 and other new evidence. It sets out a Vision for Waltham Forest built upon three components:
- a liveable Waltham Forest;
 - growing a creative, diverse and resilient economy in Waltham Forest; and
 - Waltham Forest as a place of Leisure. The latter references the Regional Park.
- 10 **Scale of Growth and Spatial Strategy**
The Spatial Strategy outlines how significant levels of housing, employment, office and retail development will be planned for and provided (Policy 2 Scale of Growth) including net increases of 27,000 additional homes, 46,000sqm for employment purposes and support for physical, social and green infrastructure provision commensurate with the scale of growth. The Council's preferred approach to distribution of growth sees the Borough divided into three areas South, Central and North within which 'Strategic Locations' are identified as the main focus for development and investment. Policies are included for each area and the Strategic Location.
- 11 Policy 3 'Location and Management of Growth' provides an overview of the quantum of growth:
- **South Waltham Forest** – offers the largest opportunities for regeneration. A minimum of 15,000 new homes and 3,250 new jobs are planned. Included as part of this is a growth target for 2,850 new homes within the 'Lea Bridge and Church Road Strategic Location' (Policy 7), 700 new homes in the 'Low Hall Strategic Location' (Policy 8) and 6,350 new homes within the 'Leyton Strategic Location' (Policy 9).
 - **Central Waltham Forest** – 8,000 homes and 1,600 jobs with a minimum target of 1,650 new homes for the 'Blackhorse Lane Strategic Location'
 - **North Waltham Forest** – 4,000 homes and 1,940 jobs, with a minimum of 450 homes for the 'Sewardstone Road Strategic Location' (Policy 21) and 900 new homes within the 'North Circular Strategic Location' (Policy 22).
- 12 The draft Local Plan housing policy has been informed by Waltham Forest's Growth Capacity Study 2018 (which is not yet publicly available) and the Greater London Authority (GLA) Strategic Housing Land Availability Assessment Housing. These assessments provide evidence which shows that by making effective use of land, intensification and increased density the strategic locations

have significant capacity to accommodate the identified growth (Policy 23). Area Supplementary Planning Documents, Masterplans and Planning briefs are identified as the mechanisms that will be used to explore opportunities in these areas. New homes will be directed around transport hubs and accessible locations.

- 13 The Spatial Strategy is also clear on the need to protect designated sites and areas such as Green Belt and MOL, and to ensure an effective use of previously developed land, except where it is of high environmental value (Policy 3 D and E)
- 14 The Call for Sites process remains open as part of this consultation and will be used to identify the potential pool of sites to be included in the Brownfield Land Register. Site suggestions will be used to inform the Proposed Submission version of the draft Local Plan to be published Spring 2020.
- 15 **Leisure and Culture**
As the first Mayor's London Borough of Culture the Draft Plan includes strong policy to promote culture and creativity (Policy 45) which is considered to include important outdoor space "such as Lee Valley Regional Park and the Walthamstow Wetlands" para 10.4. Policy is aimed at directing major development of arts, culture, entertainment and visitor facilities to major district centres and accessible locations in line with planning policy and the sequential test.
- 16 Similarly, Policy 48 which deals with leisure developments as well as retail and office developments directs new leisure and cultural/tourism, entertainment, hotel, community and other service users to designated centres.
- 17 **Protecting and Enhancing the Environment**
The draft Plan recognises the value of the Borough's green and blue spaces particularly in terms of the physical and mental health and wellbeing of its residents. The Plan identifies the Lee Valley Regional Park as an important part of this resource and includes Policy 87 which relates specifically to the Regional Park and Epping Forest as key assets within the borough which should be protected and enhanced.
- 18 Policy 84 'Green Infrastructure and the Natural Environment' provides detail on development in Green Belt and MOL. The Council will support proposals that contribute to the protection of, and improved access to, Green Belt and MOL and which deliver development and regeneration principally through the use of brownfield land and buildings. Proposals can come forward under exceptional circumstances but these must meet a set of criteria relating to a high standard of design, quality of landscaping, existing open space uses, and contribution to the borough's green infrastructure network.
- 19 The Council recognise that the Borough's Green Belt and MOL includes brownfield land which has previously been in industrial use, for example in areas such as Lea Bridge and on the fringes of the North Circular. A Green Belt review is in hand to consider these areas and whether the circumstances are such that the boundaries of the Green Belt/MOL can be adjusted or the land developed. Para 17.6.
- 20 The draft Plan includes detailed policies on Open Space Sport and Recreation – Policy 85 and Biodiversity, Policy 86. The latter offers a high level of protection,

and enhancement for biodiversity resources both on site and within the vicinity of a development site. Ecological assessments must be undertaken from the earliest stages of the pre-application process and development is expected to provide biodiversity benefits in accordance with the principals of net gain.

- 21 The ecological function of the waterways within the Borough are highlighted in the Plan with specific reference to the River Lee and the Regional Park. Policy 88 'Waterways' seeks to protect and enhance the water environment whilst also ensuring proposals affecting the waterways do not inhibit their use for freight transport.

COMMENTS ON THE DRAFT LOCAL PLAN

22 Lee Valley Regional Park and Policy 87

Reference to the Regional Park is now included within the Spatial Strategy and across a number of the thematic policies/policy sections. In particular Policy 87 'The Lee Valley Regional Park and Epping Forest' and its supporting text is helpful. Paragraphs 17.21 and 17.23 to 17.24 make reference to the Authority's statutory role and planning functions and our adopted area proposals, as requested by the Authority in its previous comments. A minor update is needed to take account of recent work and this is shown in the attachment to the letter at Appendix A to this report.

- 23 Policy 87 largely carries forward the wording from the current Development Management Policies Document (DMPD) Policy DM12 although without reference to the detail of proposals and with some policy wording moved into the supporting text. Whilst it might be unrealistic to expect draft Policy 87 to reference the detail of all the Area Proposals that are relevant to the borough it is important that a policy statement supporting the PDF Area Proposals be retained, as part of policy. The precedent for this position was established as a result of the examination process for both the Core Strategy and DMP document and is documented in the Inspector's reports, from 2011 and 2013. The proposed policy wording to be included is set out in the letter at Appendix A to this report and will be submitted as part of the Authority's formal response.

24 Strategic Locations and Park Venues

Whilst draft Policy 87 offers support to the Regional Park and the PDF Proposals there is a need to strengthen policy support for the Park's leisure and sporting venues, for example the Lee Valley Ice Centre, Riding Centre and also the Lee Valley Hockey and Tennis Centre which lies within the Borough and the Leyton Strategic Location. The Authority previously highlighted the important contribution of its venues (as well as the parklands) to the Borough's leisure needs. They form part of the offer promoted by the Council's Vision: 'Waltham Forest as a place of leisure' and will be part of the Borough's cultural legacy following its 2019 status as the London Borough of Culture.

- 25 Draft policies supporting the provision of leisure, culture, entertainment and visitor facilities direct development to major district centres and accessible locations which is in accordance with government planning policy guidance. This raises issues for the Authority when the Park's leisure and sporting venues lie largely on the periphery of major centres. Added to which most are also situated within Green Belt or MOL.
- 26 There needs to be further formal discussion with officers from the Borough as to how the Local Plan can support the Authority's future plans and investment for

enhancing the Park's leisure and sporting venues.

- 27 The location of the Park's main venues either adjacent to or within the Strategic Locations identified in the Plan should be a key factor in favour of a more supportive policy approach that acknowledges leisure as part of the growth scenario. The Lee Valley Ice Centre and Riding Centre lie just outside the Lea Bridge and Church Rd Strategic Location whilst the WaterWorks Centre sits within it. All these venues are close to Lea Bridge Station. The Leyton Strategic location, (shown on the diagram at page 32 of the draft Local Plan) includes the Lee Valley Hockey & Tennis Centre (LVHTC). Please refer to the diagram at Appendix C to this report, which reproduces the Strategic Locations for South Waltham Forest.
- 28 The Area Profile text should acknowledge these leisure venues, and their contribution to the character of the area and its leisure, cultural and sporting opportunities. This would be the opportunity to reference the Authority's considerable investment in the new Ice Centre on Lea Bridge Road, and the Lee Valley Leisure Trust's plans for improving the offer at the Lee Valley Riding Centre.
- 29 Additional policy text should be added under Policy 6 'South Waltham Forest' - which covers all the main venues in the south of the borough - offering support to proposals that will improve and grow the visitor, sporting and wider cultural offer of the Lee Valley Regional Park (LVRP) and its venues, thereby ensuring their long-term sustainability. The full policy text addition is set out in the letter at Appendix A to this report.
- 30 **Strategic Locations Access and connectivity**
Threaded throughout the Spatial Strategy are a number of policy references that seek improvements to permeability and connectivity that would benefit cycle and pedestrian access into and through the Regional Park. The policies for the Strategic Locations have identified a number of specific access improvements and linkages that are also promoted by or would complement the Park Development Framework (PDF) Area Proposals. These policies establish a framework for co-operative working between the Council, the Authority and other stakeholders to secure access improvements and links into the Park as development comes forward.
- 31 For example; PDF Area 2 Proposals have highlighted the importance of reconnecting the Low Hall area into the rest of the Park at Walthamstow Marshes. The draft Local Plan Policy 8 Low Hall Strategic Location bullet 5. States:

"Development in the Low Hall Strategic Location over the Plan period will deliver the following priorities....

- Improves accessibility, permeability and legibility from Low Hall into the Lee Valley Regional Park and Lea Bridge Station by improved bus routes, walking and cycling"...

Similarly, in the Leyton Strategic Location, Policy 9 states that development will deliver an improved public realm and walking and cycling accessibility, connectivity, permeability and legibility to the Lee Valley Regional Park, River Lee, Queen Elizabeth Olympic Park (QEOP), as well as other identified routes. 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.

32 Green Belt, MOL and the Call for Sites

The outcome of the Borough's Green Belt review could be significant for strategic locations such as Lea Bridge Road. The diverse nature of the Green Belt and MOL within the Borough does need to be considered, especially where brownfield land could offer opportunities to concentrate growth in accessible locations within the identified strategic locations. The Authority's response to the call for site exercise suggested that two sites within the Lea Bridge Road area are de-designated from Metropolitan Open Land and considered for residential development. It is understood that the Borough is currently carrying out further work to review Green Belt/MOL land and therefore no decisions have been made on these sites at this stage.

- 33 The outcome of the Green Belt review will be significant in this respect and officers will be seeking further detail on this matter and the Call for Sites process.

34 Biodiversity

The manner in which Policy 86 'Biodiversity and Geodiversity' is framed suggests it is only concerned with proposals that will affect biodiversity (and geodiversity). This could mean that a development where there is no impact would have no requirement to add features for biodiversity. The National Planning Policy Framework (NPPF) states that when determining planning applications local planning authorities should encourage opportunities "...to incorporate biodiversity improvements in and around development....., especially where this can secure measurable net gains for biodiversity" (para 175 d). An amendment to the opening sentence under Policy 86 should be considered as follows:

Proposals ~~affecting~~ **should seek to improve** biodiversity and geodiversity resources in the Borough ~~will~~ **and ensure that:**

- 35 Policy 86 B states that "All major development proposals are required to include a biodiversity survey of the site". Whilst this is supported it is also the case that smaller scale developments could equally have an impact on biodiversity. All proposals should consider biodiversity from the outset to ensure relevant surveys are carried out. Policy 86 D could also be amended to strengthen its intent so that it states:

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

- 36 The Council recognises the value of vacant or derelict land awaiting development to nature conservation under Policy 86 E and this is endorsed. It states that this land should be protected on a temporary basis. It would be helpful if the supporting text for this policy could explain how this might be achieved.

ENVIRONMENTAL IMPLICATIONS

37 There are no environmental implications arising directly from the recommendations in this report but the draft Local Plan for Waltham Forest 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

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

HUMAN RESOURCE IMPLICATIONS

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

LEGAL IMPLICATIONS

40 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.

41 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

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

EQUALITY IMPLICATIONS

43 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 Waltham Forest Consultation Draft Local Plan Shaping the Borough 2020- 2035 Habitats Regulations Assessment	July 2019
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PREVIOUS COMMITTEE REPORTS

Regeneration & Planning	RP/11/17	Consultation by London Borough of	14 Dec 2017
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Committee

Waltham Forest on
the draft Local plan
Direction of Travel
document

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 | Diagram showing Strategic Locations |

LIST OF ABBREVIATIONS

PDF	Park Development Framework
SSSI	Site of Special Scientific Interest
LVH&TC	Lee Valley Hockey & Tennis Centre
HRA	Habitat Regulations Assessment
QEOP	Queen Elizabeth Olympic Park
MOL	Metropolitan Open Land
DMPD	Development Management Policies Document
GLA	Greater London Authority
LVRPA	Lee Valley Regional Park Authority
NPPF	National Planning Policy Framework
SAC	Special Area of Conservation



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19th September 2019

Dear Jane

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 18 consultation document.

A report on this matter was considered by the Authority's Members at the Lee Valley Regeneration and Planning Committee on the 19 September 2019 when the following comments were agreed. Officers would welcome further discussion on the detail of comments as part of the Duty to Co-operate process, particularly in relation to the Green Belt review, the Call for Sites process and the Local Plan policy in respect of support for the Authority's major venues and visitor facilities.

Lee Valley Regional Park Policy 87

The Authority welcomes the recognition given in the draft Local Plan to the Regional Park as a defining characteristic of the Borough and its role as a significant asset providing valuable benefits to local communities.

The Regional Park is a significant part 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 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.

The Vision statement acknowledges the Lee Valley Regional Park as part of its leisure and recreation offer. It would be helpful if under the Vision statement section 'Waltham Forest as a Place of Leisure' (page 12), the importance to the Borough of the Authority's diverse visitor facilities could also be highlighted, for example the Lee Valley Ice Centre and the Lee Valley Riding Centre.

The references to the Regional Park that are now included within the Spatial Strategy and across a number of the thematic policies are supported.

Inclusion of Policy 87 'The Lee Valley Regional Park and Epping Forest', and its supporting text, carries across key elements of policy from the Development Management Policies Document (DM12), that will assist in protecting and enhancing the Park. Paragraphs 17.23-24 also set out the statutory role of the Park Authority and its planning functions. These inclusions are welcomed and supported.

However, the current policy reference supporting the Park Development Framework (currently DM12 H) has been moved to supporting text under para 17.21. The Authority wishes to see this reinstated as part of Policy 87.

It is important that a policy statement supporting the Park Development Framework Area proposals is included, particularly as all the PDF Area proposals which relate to the Park within Waltham Forest have been adopted. This would fulfil the requirements of the Park Act Section 14 (2) (a), a matter that was previously covered in both the Examination of the Core Strategy 2011 and in the 2013 Examination of the Development Management Policies Document, please refer to the detail in the following Inspector's Reports http://static.walthamforest.gov.uk/sp/documents/core_strategy_inspector_s_report_final-lr.pdf

<http://static.walthamforest.gov.uk/sp/Documents/DMP-Local-Plan-Inspector-Final-Report-7-Aug-13.pdf>

Suggested proposed amendments to Policy 87 and minor changes to the supporting text are included as an Appendix to this letter.

Strategic Locations

The Authority previously highlighted the important contribution of its venues (as well as the parklands) to the Borough's leisure needs. They form part of the offer promoted by the Council's Vision: 'Waltham Forest as a place of leisure' and will be part of the Borough's cultural legacy following its 2019 status as the London Borough of Culture. Whilst the draft Local Plan includes policy that supports the provision of leisure, culture and visitor facilities these are focused on directing development to major district centres and accessible

locations. These policies would not then necessarily apply to the leisure and sporting venues located within the Park and this leaves a policy gap.

The location of the Park's main venues either adjacent to or within the Strategic Locations does however offer the opportunity to include a supportive policy approach, one that recognises leisure as a key component of the growth agenda and the need to support their long-term sustainability and growth.

The majority of the Authority's venues are located within 'South Waltham Forest' Area, which according to the Local Plan, offers the greatest potential for regeneration and good growth. Both the Lee Valley Ice Centre and Riding Centre lie just outside the Lea Bridge and Church Rd Strategic Location whilst the WaterWorks Centre sits within it. With the reopening of Lea Bridge Station this is an accessible location. The Leyton Strategic location as outlined in the diagram on page 32, includes the Lee Valley Hockey & Tennis Centre.

The Area Profile text should acknowledge these leisure venues, and their contribution to the character of the area and its leisure, cultural and sporting opportunities. The supporting text could reference the Authority's considerable investment in the new Ice Centre on Lea Bridge Road, its popularity as a leisure facility amongst a range of different groups, residents and visitors, and the Lee Valley Leisure Trust's plans for improving the offer at the Lee Valley Riding Centre and Lee Valley Hockey & Tennis centre.

The following policy text is proposed under Policy 6 to sit as bullet L

Policy 6 South Waltham Forest

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

L. Improve and grow the visitor, sporting and wider cultural offer of the Lee Valley Regional Park and its venues, and thereby ensure their long-term sustainability and contribution to the growing visitor economy

Officers of the Authority would welcome the opportunity to discuss this matter further as part of the Duty to Co-operate process.

Access and Connectivity

The Authority supports the policy references throughout the spatial strategy that seek improvements to permeability and connectivity that would benefit cycle and pedestrian access into and through the Regional Park and linkages with other open spaces and visitor attractions.

Policy 84 'Green Infrastructure and the Environment' also promotes the need to ensure proposals improve the connectivity and accessibility of the

Borough's green and blue infrastructure including the Green Belt and MOL. Given the substantial area of the Park within the Borough and the range of landscapes and leisure experiences it provides this emphasis on accessibility is important.

The Authority notes that policy for the Strategic Locations identifies a number of specific pedestrian and cycle access improvements and connections that are also promoted by or would complement the PDF Area Proposals:

These policies establish a framework for co-operative working between the Council, the Authority and other stakeholders to secure access improvements and links into the Park as development comes forward.

Officers are in the process of drawing up a range of Park wide projects, (as part of the PDF delivery, process), directed at landscape, access and environmental improvements to better connect visitors and local people with the Park and enhance the visitor offer. Section 20 of the Local Plan - 'Delivering the Local Plan' should include a statement supporting partnership working to ensure funding and delivery of these 'access projects' and setting out the role of the Borough in facilitating this process, including through developer contributions where appropriate.

Accommodation for Gypsies and Travellers

Policy 35 Gypsies and Travellers seeks to protect the existing site in the Park at Folly Lane and supports the intensification of this site (along with another site, Hale Banks North) to provide extra pitches. Whilst the Authority acknowledges that the site at Folly Lane is a well established site in the Park it would expect any intensification to be contained within the existing site boundary.

Green Belt

It is positive that the diverse nature of the Green Belt and MOL within the Borough has been recognised in the draft Local Plan. As the Park boundary includes parts of Lea Bridge Road and the fringe of the North Circular there are sites within the Regional Park that could potentially be released from Green Belt and MOL in the future.

The outcome of the Council's Green Belt review is critical in respect of the sites identified by the Authority through the Call for Sites process which identified sites on Lea Bridge Road. Accordingly, if exceptional circumstances exist in these areas and are confirmed by the Council's Green Belt Review, paras 136 to 138 of the NPPF (Feb 2019) sets out the circumstances in which the boundaries of these parcels may be adjusted or the land developed. It is understood that further work is in hand to review Green Belt/MOL land and the Authority would wish to be involved in the next stages of this process.

Biodiversity Policy 86

A large area of the Regional Park within the borough is of high biodiversity value such as the Walthamstow Marshes SSSI, and Walthamstow Reservoirs SPA, and the Site of Metropolitan Importance for Nature Conservation (along the River Lee Navigation) or is land that supports these designated areas by offering 'buffer' habitat. Supporting text for Policy 86 Biodiversity and Geodiversity should therefore, under paragraph 17.11, make reference to partnership working with the Lee Valley Regional Park Authority as well as Natural England and the Conservators of Epping Forest. Paragraph 17.12 should reference the Authority's new Lee Valley Biodiversity Action Plan which was recently adopted and includes contributions from borough officers.

As it currently reads the opening statement under Policy 86 'Biodiversity and Geodiversity' suggests it is only concerned with proposals that will affect biodiversity (and geodiversity). This could mean that a development where there is no impact would have no requirement to add features for biodiversity. Local planning authorities are guided by the NPPF when determining planning applications to encourage opportunities "...to incorporate biodiversity improvements in and around development...., especially where this can secure measurable net gains for biodiversity" (para 175 d). It is considered that an amendment to the opening sentence under Policy 86 would be appropriate as follows:

Proposals affecting should seek to improve biodiversity and geodiversity resources in the Borough and will ensure that.

Policy 86 B should also be amended. It states that "All major development proposals are required to include a biodiversity survey of the site". Whilst this is supported it is also the case that smaller scale developments could equally have an impact on biodiversity. All proposals should consider biodiversity from the outset to ensure relevant surveys are carried out and this should be clarified in the policy. The supporting text under para 17.11 that ecological assessments must be developed from the earliest stages of the pre-application process is welcomed, this will help to ensure timely assessments of biodiversity value and well planned mitigation.

A further amendment is suggested in relation to Policy 86 D to strengthen its intent so that it states:

"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."

It is noted that the Council has recognised that transitional vacant or derelict land can have ecological value and that under Policy 86 this land 'should be protected on a temporary basis'. It would be helpful if the supporting text for this policy could explain how this might be achieved.

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 Sincerley

Claire Martin
Policy Officer, Lee Valley Regional Park Authority

Appendix Policy 87

Section 17 Protecting and Enhancing the Environment

Proposed Amendments to Policy 87 The Lee Valley Regional Park and Epping Forest

Proposals which affect the Lee Valley Regional Park and/or Epping Forest 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 or Epping Forest 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 in proximity to the Epping Forest Special Area of Conservation (SAC) should improve access and biodiversity enhancements in line with any requirement of Natural England and the Epping Forest Conservators

The Council supports the Lee Valley Regional Park Authority's Park Development Framework. The contents of the Lee Valley Park Development Framework will be a material consideration in the determination of planning applications.

17.21 The Lee Valley Regional Park and Epping Forest are major assets for Waltham Forest providing valuable benefits to local communities in terms of access to nature and to healthy outdoor recreation. The Council supports Epping Forest's long term management objectives and Lee Valley Regional Park Authority's Park Development Framework. The Council will work cooperatively with the Lee Valley Regional Park Authority and the Epping Forest Conservators.

17.23 The Lee Valley Regional Park Authority (LVRPA) is a statutory authority created by the Lee Valley Regional Park Act 1966 (The Park Act). It has a statutory responsibility to either provide directly or work with partners to provide facilities for sport, recreation, leisure, entertainment and nature conservation throughout the Park. Section 14 (1) of the Park Act requires the Authority to prepare a plan setting out proposals for the future management and development of the Regional Park and riparian authorities such as Waltham Forest are required to include those parts of the plan affecting their area within their own relevant planning strategies and policies (Section 14(2))

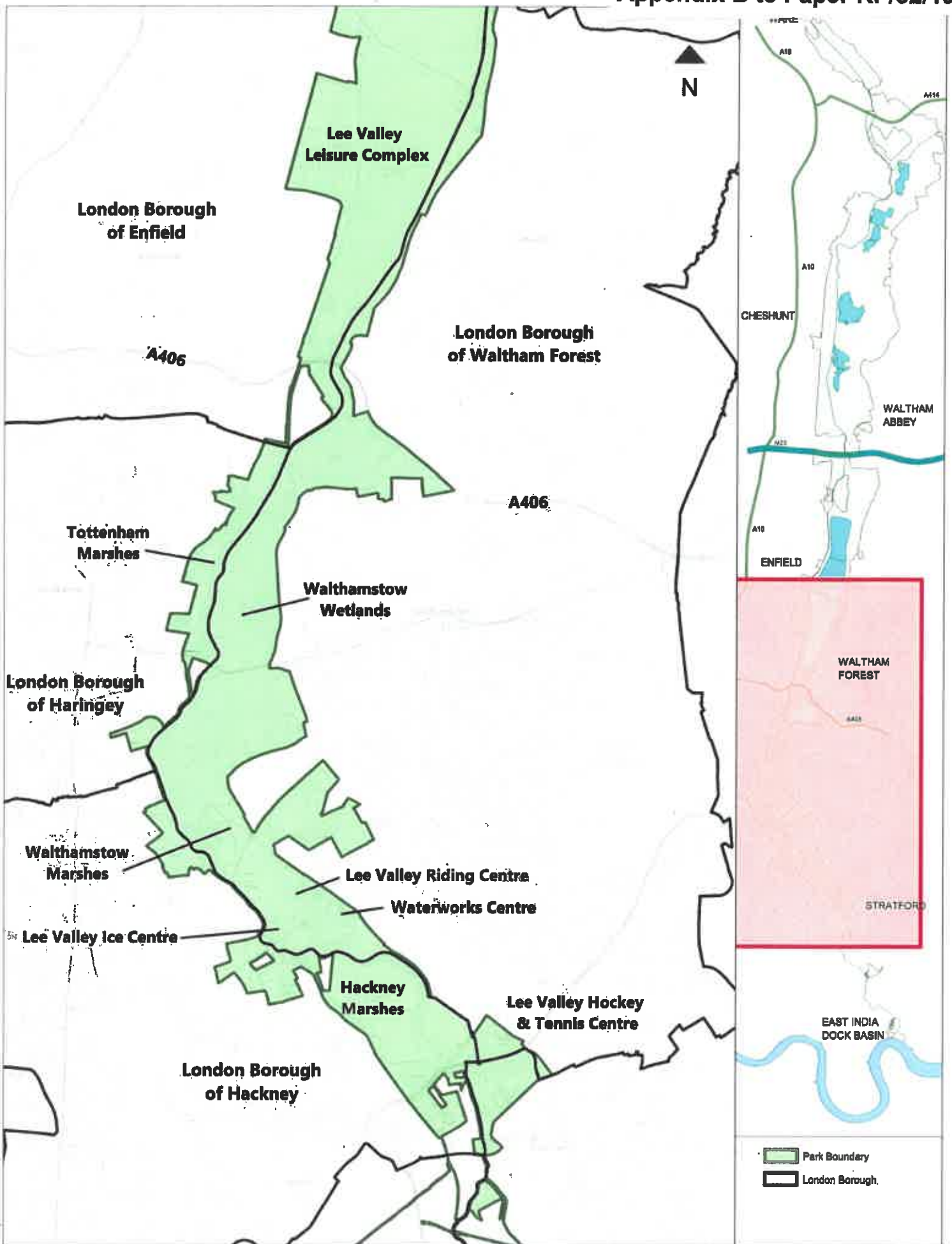
(a) although inclusion does not infer that the planning authority necessarily agrees with them (Section 14(2) (b)). ~~Both the Park Plan 2000 and The Park Development Framework~~ **Area Proposals** are relevant in terms of Section 14 (2) of the Park Act and are formal statements of the Authority's position in respect of development within the Regional Park.

17.24 Further, sections 14 (subsections 4-7) of the Park Act requires local planning authorities to consult with the LVRPA on applications for planning permission which they consider could affect the Park. Section 14 (subsections 8-9) allows the LVRPA to refer the decisions of the riparian authorities to the Secretary of State if it is considered by the LVRPA that the decision taken materially conflicts with the proposals of the Authority for the development of the Park.

Addition to Glossary

Lee Valley Regional Park Development Framework – a suite of documents setting out the Lee Valley Regional Park Authority's plan of proposals for the development and use of the Regional Park including the Vision, Aims Principles document, Area Proposals, Landscape Strategy, and Park Development Framework Strategic Policies

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Lee Valley Regional Park Authority within London Borough of Waltham Forest



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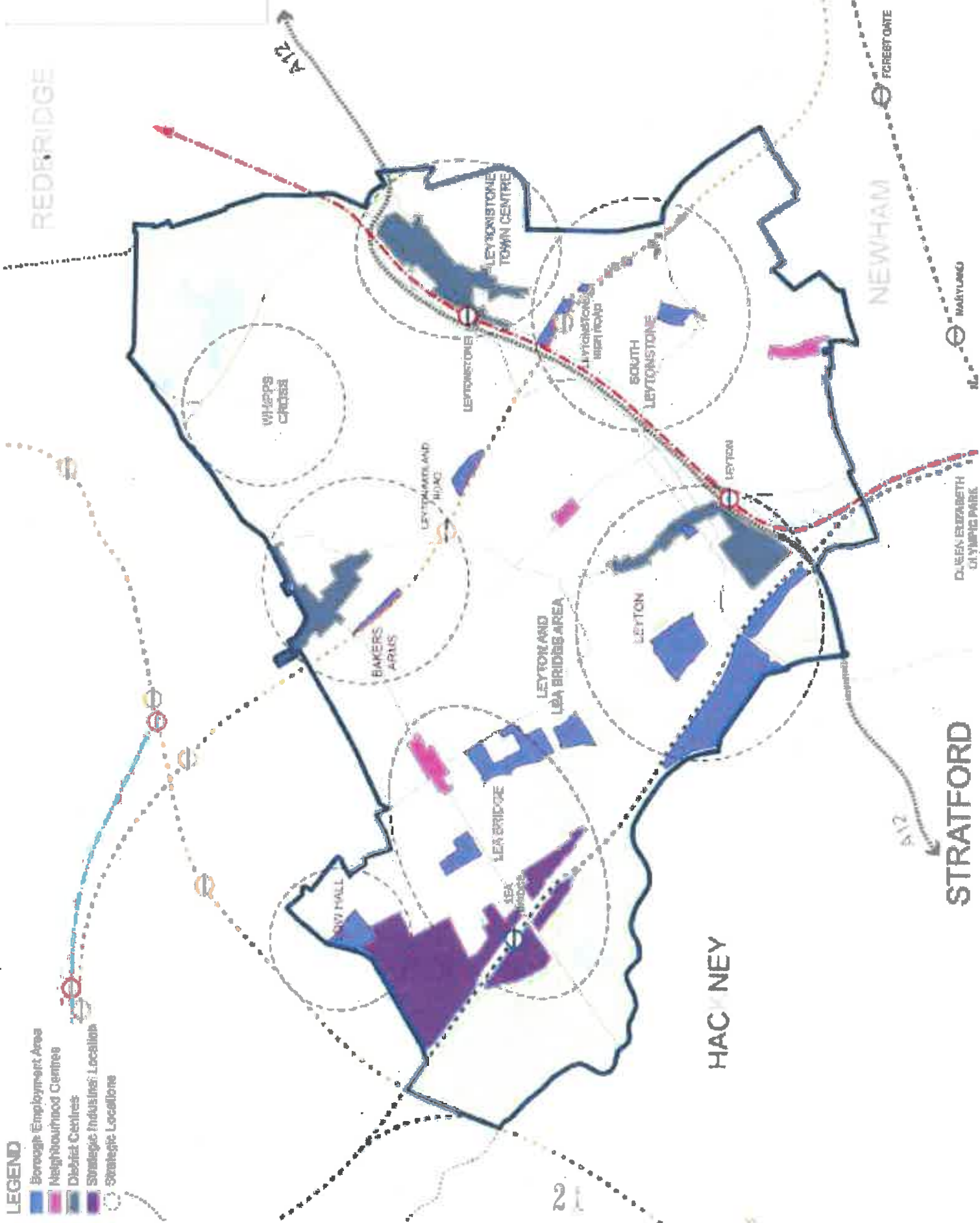
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Appendix C

Strategic Locations South Waltham Forest



- LEGEND**
- Borough Employment Area
 - Neighbourhood Centres
 - District Centres
 - Strategic Industries Location
 - Strategic Locations

