



LEE VALLEY REGIONAL PARK AUTHORITY

**REGENERATION AND PLANNING
COMMITTEE**

22 FEBRUARY 2018 AT 12:00

Agenda Item No:

5

Report No:

RP/15/18

CONSULTATION BY THE MAYOR OF LONDON ON THE DRAFT LONDON PLAN

Presented by the Head of Planning and Strategic Partnerships

SUMMARY

The London Mayor is consulting on the latest draft of the London plan which is the spatial development framework required to direct and manage growth for the next 20 years. The draft plan is predicated around 'Good Growth' - defined as growth that is socially and economically inclusive and environmentally sustainable. Delivery will be a significant challenge given that the plan anticipates that London will have a population of 10.8m and 6.9m jobs by 2041 requiring delivery targets of 66,000 new homes and 49,000 new jobs per annum. Set against these ambitious targets, strong protections are maintained for employment land, Green Belt and Metropolitan Open Land. The Lee Valley is identified as a regeneration corridor.

Despite the strategic importance of the Regional Park to the leisure needs of London with over 3m Londoners visiting each year it receives only limited reference. It is considered that the plan requires revision to include references to the importance of the Regional Park given the international and national status of its legacy venues and the quality of its open spaces. Furthermore, there needs to be explicit reference to the part the Authority can play in the regeneration of the Lee valley corridor. Appendix A includes the draft letter of response.

RECOMMENDATIONS

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

BACKGROUND

- 1 By the Greater London Authority (GLA) Act 1999 (as amended) the Mayor of London is required to produce a spatial development strategy (SDS) and keep it under review. The SDS is known as the London Plan. As the overall strategic plan for London it sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. The legislation requires that the Plan should deal with matters of strategic importance, taking account of the principle purposes of the GLA.

- 2 The current draft plan will be the third published since the inception of the Greater London Authority and will replace the adopted plan from 2011. It provides a spatial framework for the delivery of other adopted strategies, some of which have previously been reported to this Committee including those for Transport and Environment. The plan is designed to deliver on the Mayor's manifesto commitments.
- 3 The adopted plan was drafted as preparations for London 2012 were underway and reflects the priorities of that time including a strong focus on the delivery of the regeneration of east London building on the Olympic legacy. Whilst identifying the Regional Park as requiring protection as part of London's green infrastructure and maintaining protections for the Green Belt and Metropolitan Open Land (MOL) the Regional Park was identified as one of ten 'strategic cultural areas' across the capital, a recognition of the concentration of sporting venues and the potential for events throughout its length.

OVERVIEW OF THE PLAN

- 4 The draft plan is predicated around 'Good Growth' - defined as growth that is socially and economically inclusive and environmentally sustainable. Delivery will be a significant challenge given that the plan anticipates that London will have a population of 10.8m by 2041 requiring delivery targets of 66,000 new homes and 49,000 new jobs per annum. Set against these ambitious targets, strong protections are maintained for employment land, greenbelt and metropolitan open land.
- 5 Six strategic objectives articulate the Mayor's vision:
Building strong and inclusive communities
This requires planning policies to generate opportunities for all Londoners to ensure that they can benefit from economic growth. There is a particular focus on developing networks of town centres with the retail and service offer required to serve their local communities with spaces and places designed for inclusivity. Access for all to the capital's key places lies at the heart of this
- 6 **Making the best use of land**
There will be a focus on new development occurring in 'opportunity areas', on brownfield land, surplus public sector land and sites near transport hubs and stations. This is considered to be the most efficient way of using London's 'limited land' to accommodate growth whilst using 'place making principles' to strengthen London's distinct and varied character to make the city 'liveable'.
- 7 **Creating a healthy city**
Policies will promote more active lifestyles through the 'Healthy Streets' approach and aim to address health inequalities which currently exist with life expectancy across the capital varying for men and women of between 15 and 19 years respectively. The plan seeks to ensure that by 2041 80% of all journeys around London will be by sustainable means.
- 8 **Delivering the homes Londoners need**
The Mayor recognises that housing challenges are ones of supply and affordability and seeks to address these through an additional 66,000 new homes each year with 50% 'genuinely affordable'. This figure represents a compromise on what is needed for viability reasons as the GLA's research concludes that 65% should be the affordable housing target. There will be a

balanced approach to supply with provision made through large brownfield sites but also through the allocation of land at small sites in suburban London where the pattern of development is considered to have 'significant potential for appropriate development over time'. There is an emphasis on 'incentivising' build out rates' although the means of achieving these are unclear. Site capacity will be informed through reference to Public Transport Accessibility Level (PTAL) levels, local service provision, a density matrix with an emphasis on design quality.

9 Growing a good economy

The plan identifies the scale of economic growth to accommodate total of 6.9m jobs by 2041. This should be balanced across the broad sectors of the international economy and emerging sectors such as the digital economy. Opportunities will be focused on the central activities zone (essentially Westminster and the City) and the northern Isle of Dogs. Strategic Industrial locations are identified at Brimsdown, Innova Park and Lea Bridge. The draft plan identifies that the need for a robust and diverse economy is needed given the likely impact of Brexit. Economic benefits should be shared across all parts of society. Existing strategic employment sites and other sites across the capital will be protected.

10 Increasing efficiency and resilience

The plan aims to secure the delivery of a low carbon economy with London becoming a zero carbon city by 2050. From 2016 all new housing has been required to be zero carbon. Other policies seek to ensure that London becomes a safe and secure environment.

11 The section on 'funding' identifies that the policies and proposals have been through viability assessments to test their deliverability. At a potential cost of over £1.3tn there is a considerable public sector funding gap of around £3.1bn per annum. To address these the Mayor's office is exploring other potential sources of funding such as land value capture and harnessing the role of institutional investors to fund infrastructure up front. In addition the Mayor is continuing to secure the delivery of the recommendations of the London Finance Commission to secure devolution of fiscal powers from government.

12 In respect of green infrastructure references are made to the report by Vivid Economics on the Natural Capital Account for green infrastructure which develops the work of the Government's National Capital Accounting framework, reported to Authority in January (A/4251/18). This approach allows the re-framing of the economic value for green infrastructure against factors such as the 'avoidable' costs of public health interventions, addressing the heat island effect and climate change. Whilst the plan recognises that the public sector will still be the largest funder this could be drawn broadly from other sources such as health services.

IDENTIFICATIONS FOR THE LEE VALLEY REGIONAL PARK

13 Given the draft plan's commitment to good growth it is surprising that there is only one explicit reference to the Regional Park. This is a major omission given the Regional Parks significant value of £250m p.a. to addressing the health and well-being of Londoners identified in the recent report by Vivid Economics (2017) commissioned by the GLA.

14 The reference to the Regional Park is contained in the section on the

'opportunity area' along the Lee valley which identifies the potential scale of new development opportunities which may arise from taking advantage of 4 tracking and Cross Rail 2. Growth of around 21,000 new homes and 13,000 new jobs is anticipated with jobs in freight and logistics sectors forming part of the mix of employment opportunities. Appendix B to this report indicates the extent of anticipated housing growth in the riparian boroughs comparing the current targets with the new ones proposed. These figures identify the considerable strains on its natural environment which are likely to result from the increases in visitors to the Regional Park.

- 15 The draft plan states that a new planning framework will be issued at some point to guide this development and to protect and improve sustainable access to the Regional Park and encourage links through Hackney Wick and the lower Lee valley. Whilst this reference is to be welcomed the Regional Park can play a more significant role in regeneration of the wider valley through the release of land at select locations in line with its adopted land and property strategy. In turn capital released can be used for further investment in the Regional Park.
- 16 Other policies on Sport and Leisure (Policy S5) seek to ensure that there is a good supply of facilities which focus on local need and attempt to secure additional artificial grass pitches, sports halls and swimming pools where existing levels of unmet demand are likely to rise significantly by 2041. There is passing references to 'specialist sporting venues and stadiums' but reference to the Authority's legacy venues is not included. There are references to the need for Councils to ensure replacement of cultural venues, designated as assets of community value when faced with redevelopment.
- 17 Policies seek to protect and retain the Green Belt and MOL and to ensure that potential losses of public open space or habitats should be mitigated against. This has been a consistent feature of previous plans but in line with the National Planning Policy Framework (NPPF) (2012) the draft plan states that 'derelict and unsightly areas' do not in themselves provide a reason for development. The inclusion of this policy will only serve to undermine the role and function of the Green Belt and MOL
- 18 There are specific policies on 'urban greening' which seek the integration of measures designed to increase the areas of green space in new development. There are strong protections for Sites of importance for Nature Conservation (SINCs) and the boroughs are required to identify new SINCs and green corridors and seek opportunities to address areas of deficiency in access to nature.

APPRAISAL

- 19 Whilst it is acknowledged that the London Plan is a strategic plan the statutory purpose and role of the Regional Park in the context of London's growth is completely lost in this draft. This undermines the Abercrombie vision and the statutory basis of the Authority to create a Regional Park dedicated to leisure, recreation, sport and nature conservation. The Park plays a significant role in providing for the leisure needs of the capital. Whilst around 7m visits are made each year to the whole park, the largest proportion are made by Londoners to its venues and parklands. It is a strategic component of the capital and should be recognised as such in this plan.
- 20 Our visitor tracking indicates that visits to venues and parklands within London

attracts just over 3m visits from Londoners and across the wider Park the total is 3.3m visits. This figure is set to grow as sites such as Walthamstow Wetlands aims to achieve its target of 300,000 visits pa, together with the Authority's plans for the redeveloped ice centre and plans for Picketts Lock which will be operational within the next 3 years.

- 21 Furthermore, the Regional Park is a major venue for sporting and cultural events attracting over 3m visits p.a. who attend over 300 events. Each venue and large areas of parklands are used for international, national and local events. During this year alone the legacy venues will host FIH Women's Hockey World Cup and the UCI Track Cycling World Cup with an emerging programme for the next three years which includes the Commonwealth Games cycling in 2022. The Park will continue to play a significant role in the provision of London's leisure needs during the plan period.
- 22 The Regional Park is unique in the quality and range of its offer; it is a place comprising award winning venues, the legacy of London 2012 as well as SSSIs. Whilst over 90% of the Regional is designated as Green Belt or MOL there has to be recognition within the draft plan that an exception to this standard policy is required or a reference included in supporting text to the Authority in pursuit of its statutory purpose to allow for the redevelopment and or expansion of its venues. Without this change the Authority's ability to deliver will be frustrated.
- 23 Whilst there are references to the Lee Valley Walk the draft plan should recognise the importance of the Regional Park as it provides a route for walking and cycling to support visits through north east London connecting to Hertfordshire and Essex. It is a key part of the Mayors proposals for delivering 80% of all journeys by sustainable means.

ENVIRONMENTAL IMPLICATIONS

- 24 The draft plan is accompanied by a draft Habitats Regulations Assessment which identified the potential impacts on the Lee Valley Special Protection Area. In mitigation the work of the Authority and others was considered to satisfactorily manage out the potential for an adverse effect. A minor amendment was included to supporting text on the Lee Valley Opportunity Area to address concerns.

FINANCIAL IMPLICATIONS

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

LEGAL IMPLICATIONS

- 26 The Park Act enables the Authority to make representations to the local planning authority which they shall take into account when considering revisions to policy.

RISK MANAGEMENT IMPLICATIONS

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

EQUALITY IMPLICATIONS

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

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BACKGROUND REPORTS

London Plan

1st December 2017

APPENDICES ATTACHED

Appendix A	Draft response letter
Appendix B	Comparison of housing numbers 2011 and 2017 London Plan
Appendix C	London Plan - key diagram

LIST OF ABBREVIATIONS

GLA	Greater London Authority
SDS	Spatial Development Strategy
MOL	Metropolitan Open Land
PTAL	Public Transport Accessibility Level
NPPF	National Planning Policy Framework

Appendix A to Paper RP/15/18



Darren Richards
Team Leader
London Plan team
Greater London Authority
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London
SE1 2AA

23rd February 2018

Dear Darren

Draft London Plan consultation

Thank you for consulting the Authority on your draft plan. This was considered at the meeting of the Regeneration and Planning committee this month when the following comments were agreed.

Whilst it is acknowledged that the London Plan is a strategic plan the statutory purpose and role of the Regional Park in the context of London's growth is completely lost in this draft. This undermines the Abercrombie vision and the statutory basis of the Authority to create a Regional Park dedicated to leisure, recreation, sport and nature conservation. The Park plays a significant role in providing for the leisure needs of the capital. Whilst around 7m visits are made each year to the whole park, the largest proportion are made by Londoners to its venues and parklands. It is a strategic component of the capital which will assume greater significance against the backcloth of continued growth and should be recognised as such in this plan.

Our visitor tracking indicates that visits to venues and parklands within London attracts just over 2m visits from Londoners and across the wider Park the total is 3.3m visits. This figure is set to grow as sites such as Walthamstow Wetlands aims to achieve its target of 300,000 visits pa, together with the Authority's plans for the redeveloped ice centre on Lea Bridge Road and plans for Picketts Lock which will be operational within the next 3 years. Each of these schemes will have considerably wider regeneration benefits within the Lee Valley Opportunity Area bringing jobs and leisure in an area of deprivation. The Regional Park is important to both the whole of London and local communities along the valley.

Furthermore, the Regional Park is a major venue for sporting and cultural events attracting around 270,000 spectators at over 300 events each year. Each venue and large areas of parklands are used for international, national and local events. Since opening in 2014 our two legacy venues within London, the LV Hockey and Tennis Centre and the VeloPark have hosted 18 international events and this year will host

the FIH Women's Hockey World Cup and the UCI Track Cycling World Cup with an emerging programme for the next three years which includes the Commonwealth Games cycling in 2022. The Regional Park will continue to play a significant role London's leisure needs during the plan period. This should be referenced explicitly in your plan

The Regional Park is unique in the quality and range of its offer; it is a place comprising award winning and internationally regarded venues, the legacy of London 2012 as well as SSSIs. Whilst over 90% of the Regional is designated as green belt or MOL there has to be recognition within the draft plan that an exception to this standard policy is required or a reference included in supporting text to the Authority in pursuit of its statutory purpose to allow for the redevelopment and or expansion of its venues. Without this change the Authority's ability to deliver will be frustrated.

For the Authority this is particularly important as we are reducing dependency on the levy paid by the London taxpayers, by ensuring that venues operate at nil cost and are sustainable and viable community assets in the long term. Sites such as Picketts Lock where we will shortly announce a partnership with private sector investors are identified in the Council's local plan as major developed sites to reflect the old designation recognised in government advice contained in PPG 2. This designation allowed the Authority the freedom in the past to secure major development such as cinema and the former leisure centre and the Lee Valley Athletics Centre building and track which was completed in 2007.

Extrapolating from the figures used in the GLAs recently commissioned report by Vivid Economics, Natural Capital Accounts for Public Green Space in London (2017), the Regional Park in London delivers £250m in benefits to Londoners in 'avoided health' costs and providing mitigation against climate change and the capital's 'heat island' effects.

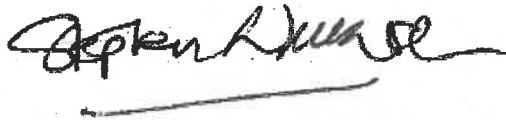
Whilst there are references to the Lee Valley Walk the draft plan should recognise the importance of the Regional Park as it provides a route for walking and cycling to support visits through north east London connecting to Hertfordshire and Essex. It is a key part of the Mayors proposals for delivering 80% of all journeys by sustainable means.

Finally, the draft plan identifies the Lee Valley Opportunity Area as a significant growth corridor where land will be at a premium. Whilst recognising the importance of the Regional Park for recreation and leisure we recognise that under used land in the Regional Park could support growth opportunities with appropriate mitigation to improve access and protect nature conservation, the Special Protection Area and Ramsar.

The Authority is shortly to consult on a revised set of strategic policies which are accompanied by a Habitats Regulations Assessment, the results of which should be considered as part of the evidence base for your draft plan. We would be happy to share this with your team.

I would be happy to meet with you and your team to go through any of the above points

Yours sincerely,

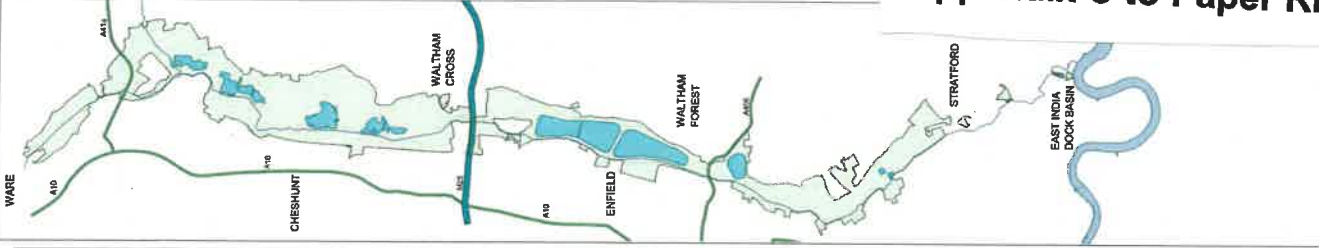
A handwritten signature in black ink, appearing to read 'Stephen Wilkinson', with a horizontal line underneath it.

Stephen Wilkinson
Head of Planning and Strategic Partnerships

Appendix B to Paper RP/15/18

Comparison of 10 Year Housing Target for London Plan March 2016 and Draft London Plan 2017 looking only at the Riparian Boroughs. Figures are extracted from Table 3.1 (March 2016) and Table 4.1 (December 2017). London total also given for comparison.

Borough/Planning Authority	Minimum Ten Year Target 2015-2025 London Plan March 2016	Ten Year Housing Target 2019/20 – 2028/29 Draft London Plan December 2017
Enfield	7,976	18,760
Hackney	15,988	13,300
Haringey	15,019	19,580
LLDC	14,711	21,610
Newham	19,945	38,500
Tower Hamlets	39,314	35,110
Waltham Forest	8,620	17,940
London Total	423,887	649,350



MAYOR OF LONDON N

The London Plan Key Diagram

The Key Diagram brings together the main components of the Mayor's Spatial Strategy for London - see chapter 2 Draft London Plan Mayor of London December 2017

- OAs Central London
- OAs Elizabeth Line East and West
- OAs Crossrail 2 North and South
- OAs London Trams
- OAs Bakerloo Line Ext
- OAs Thameslink/HS2
- OAs Thames Gateway
- Central Activities Zone & Northern Isle of Dogs
- Green Belt and Metropolitan Open Land
- Elizabeth Line
- Crossrail 2
- Thameslink
- HS1
- HS2
- Northern line extension
- Bakerloo line extension
- London Trams
- London Overground extensions
- DLR extension
- Potential or proposed Thames crossings
- Stations
- Key interchange stations
- International town centres
- Metropolitan town centres
- Other town centres
- Strategic Industrial Location
- Strategic Outer London Development Centre

Source: GLA Planning December 2017

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