



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

Agenda Item No:

7

Report No:

RP/10/17

**CONSULTATION BY THE LONDON BOROUGH OF HACKNEY
ON THE DRAFT (REGULATION 18) LOCAL PLAN 2033
'HACKNEY A PLACE FOR EVERYONE'**

Presented by the Head of Planning and Strategic Partnerships

SUMMARY

Hackney is consulting on their draft Local Plan 2033 (Regulation 18 version). It sets out the Council's draft planning policies to guide and manage development in the borough for the next 15 years through to 2033.

The Authority's comments are attached as Appendix A to this report and are largely supportive of the draft spatial objectives, accessibility and open space related policies. Further detail is sought however on proposals for renewal and intensification within the 'Lea Valley Edge' growth corridor in order to ensure adverse impacts on the openness of the Park and its associated waterways can be avoided.

These comments were submitted as an officer level response in advance of this committee to meet the consultation deadline.

RECOMMENDATION

Members Approve: (1) the draft comments included in Appendix A to this report as the Authority's response to the London Borough of Hackney's consultation on the draft (Regulation 18) Local Plan 2033.

BACKGROUND

- 1 Since the production of its current Local Plan (Core Strategy 2010, the Development Management Local Plan 2015 and Site Allocations Local Plan 2016) Hackney has experienced a period of sustained economic growth, including growth within the leisure and evening economy sectors. There has also been a rapid rise in population, projected to reach 317,000, an increase of 55,000 by 2033. In response Hackney are seeking to provide at least 23,000 new jobs and 30,000 additional homes by 2033.
- 2 Consultation held late last year focused on identifying the challenges, opportunities and key issues for the borough. In response officers focused on

strategic issues around open space, the waterways and nature conservation. This new draft Local Plan 'Hackney a Place for Everyone' sets out the Council's preferred approach for planning for growth and includes draft planning policies to guide and manage development in the borough for the next 15 years through to 2033. A Proposed Submission version of the Local Plan is programmed to be ready by June 2018 and it is this version that will identify opportunity sites for development, update the borough wide Site Allocations document and include a revised Policies Map showing all the land designations necessary to support Plan implementation. Hackney's draft Local Plan is being produced as the new London Plan emerges for consultation and in advance of the GLA's revisions to the Upper Lea Valley Area Opportunity Planning Framework.

- 3 The Regional Park forms an important element of the Borough's green infrastructure adjacent to major residential and business populations, with significant open spaces, leisure and ecological resources, and strategic pedestrian and cycle routes. These include Hackney Marshes, the River Lee and Lea Navigation, parts of Queen Elizabeth Olympic Park, Middlesex Filter Beds Nature Reserve, Millfields and Springfield Park and the Lee Valley Pathway and Lea Valley Walk, (a total of approximately 197 hectares, or 487 acres), please refer to the plan at Appendix B to this report. This area does include developed areas including one employment site 'Here East'. These spaces in turn connect with and provide access to a continuous network of open space and habitats, waterways, paths and cycle routes that open up the wider Regional Park to local residents and visitors.
- 4 Park Development Framework (PDF) Area 2 Proposals, The Three Marshes: Walthamstow, Leyton and Hackney cover the Park within Hackney. The main focus of these is the delivery of pedestrian and cycle access improvements into the Park, linking with adjacent residential areas, and underground stations, and support for work being undertaken by Hackney to protect and enhance the ecological value of the area and improve access to nature. Proposals also support enhanced visitor facilities and water based recreational and sporting activity on the River Lee Navigation, providing this can be achieved without detriment to the waterside ecology and habitats.

THE DRAFT LOCAL PLAN 2033

- 5 Nine spatial objectives set the framework which will guide future growth. These include objectives to guide growth that will; establish 'liveable and accessible neighbourhoods'; 'protect and enhance existing open spaces and develop and improve green links between these spaces'; and 'support the creation of new open spaces and vertical gardens'.
- 6 The most significant growth is planned in the town centres, high streets and employment hubs, but also along the borough's key corridors where it will help to deliver improvements to the public realm, new community facilities and improved connections between neighbourhoods, open space and public transport hubs. Key areas for renewal and intensification include previously developed land along the 'Lea Valley Edge' (land adjacent to the Regional Park as illustrated in the key diagram included at Appendix C to this report) which is seen as benefiting from the proximity of the River Lea and enhancing access to the Regional Park. Clapton is also the focus for a new centre – to be created through mixed use development.

- 7 Policies recognise the need to promote sustainable transport by prioritising walking and cycling and securing improvements to public transport and, where appropriate, developers will be required to contribute to improvements. Hackney has the third lowest levels of car ownership in England (and has seen an 8% reduction in motor traffic levels between 1994 and 2011) and has one of the highest levels of cycling and bus usage in London.
- 8 Policies in the Plan recognise the importance of, and the need to protect and enhance the borough's network of open spaces, waterways and green infrastructure. This is considered a multi-functional asset which "can have ecological and quality of life benefits for the community" (para 8.1). Figures included in the Plan state that there are 395 hectares of open space in the borough (the Regional Park is identified as accounting for almost 40% of the borough's open space). However given Hackney's projected population growth additional open space is required and areas of open space deficiency have been identified mainly in the north and west of the borough. Policy support for the Park is included as part of Policy 42.
- 9 Similarly policies also address the need to protect and enhance biodiversity and for development to maximise opportunities for creating new areas of nature conservation interest. A Green Infrastructure map is included (please refer to Appendix C to this report) which identifies the Lee Navigation and Old River Lee as both green chains and green corridors (definitions are included in Appendix C to this report) to be enhanced. A potential new green chain is identified extending along Lea Bridge Road and into the Park at Millfields Recreational Ground.
- 10 Policy 49 covers the waterways, canals and the issue of residential moorings. The waterways are recognised as important both for wildlife and nature conservation and for a range of leisure interests. Development adjacent to the waterways will need to meet a range of criteria to ensure these values are maintained and enhanced. Proposals for residential moorings must have regard to the Authority's PDF area proposals and "must not:
 - i. hinder navigation along the waterway; or
 - ii. have a detrimental impact on nature conservation and biodiversity; or
 - iii. impede public access; or
 - iv. detrimentally affect leisure provision, amenity and the character and appearance of the waterway and surrounding area."
- 11 In its final chapter the draft Local Plan seeks to provide policy direction that will balance the challenges of planning for growth with the need to build in resilience to climate change by promoting an efficient use of natural resources, reduction in carbon emissions, flood risk management and an effective waste management.

COMMENTS ON THE DRAFT LOCAL PLAN

- 12 The letter at Appendix A to this report contains the Authority's comments on the draft Local Plan. It was submitted as an informal officer level response to meet the 4 December 2017 consultation deadline. Comments are largely supportive of the draft spatial objectives, accessibility and open space related policies.
- 13 Recognition of the Regional Park's important role as a Strategic Cultural Area (relates to draft Local Plan Policy 9 (and London Plan Policy 4.5)) and Policy

support for the Park under Policy 42 'Protection and Enhancement of Green Infrastructure' is welcomed and endorsed – Policy 42F states:

“F. Lee Valley Regional Park

- i. Development proposals in proximity to the Lee Valley Regional Park should improve access and links to the Park and waterways.
- ii. The Council will work cooperatively with the Lee Valley Regional Park Authority to deliver the Lee Valley Park Development Framework Area Proposals.”

A reference to the Lee Valley Ice Centre, Lea Bridge Road, should be included in supporting text under Policy 9 'Arts, Culture and Entertainment'. This is an important community asset located on the borough boundary with Waltham Forest. The Authority is seeking to redevelop the existing site to deliver a new and enhanced Ice Centre venue.

- 14 More detail is sought in relation to the proposals for renewal and intensification within the growth corridor identified as the 'Lea Valley Edge'. If both the growth corridor and the adjacent Regional Park are to benefit then policy should be included to guide redevelopment and infrastructure provision in order to avoid adverse impacts on the openness of the Park and its associated waterways.
- 15 This policy will need to consider how the design, density and delivery of new development will relate to existing green chains and green corridors along the Lee Navigation and Old River Lee and how it can support proposals for new green chains. Policies such as 42F above and Policy 49B 'Development Alongside Waterways and Canals' address some of the Authority's concerns in terms of the impact of development adjacent to the Park, but a policy that addresses the specific combination of issues within the Lea Valley Edge would be helpful.
- 16 Reference to the PDF Area Proposals under Policy 49C 'Residential Moorings' is welcomed and supported. The waterways that fall within the Park area in Hackney are popular for water based recreation and make an important contribution to the biodiversity of the borough that needs to be protected.
- 17 The attached comments (Appendix A to this report) are largely supportive of the Biodiversity policy in the draft Local Plan. Given the importance of enhancing waterside biodiversity as stated in the PDF Area 2 Proposals and the overlap of the Lea Valley Edge growth corridor with the Lee Navigation Site of Importance for Nature Conservation (SINC), it would be helpful for further detail to be included in the draft Plan as to what measures will be taken to protect and enhance biodiversity and sites of nature conservation importance.
- 18 The policy section on climate change still needs to consider the future management and use of open spaces, habitats and waterways in relation to flood water management and storage, for example some areas of parkland and open space could become increasingly important to control and store flood waters and this might impact on their leisure use. This may need to be built into the policy on green infrastructure or policy for new open space.

ENVIRONMENTAL IMPLICATIONS

- 19 There are no environmental implications arising directly from the

recommendations of this report, but the draft Local Plan for Hackney 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

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

HUMAN RESOURCE IMPLICATIONS

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

LEGAL IMPLICATIONS

- 22 Planning applications referred to this Authority are submitted under the consultative arrangements of Section 14 (4-7) of the Lee Valley Regional Park Act 1966 (the Park Act). The Park Act requires a local planning authority to consult with the Authority on any planning application for development, whether within the designated area of the Park or not, which might affect any part of the Park.

- 23 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

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

EQUALITY IMPLICATIONS

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

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BACKGROUND REPORTS

Draft Local Plan 2033 Regulation 18 consultation – October 2017
London Borough of Hackney

APPENDICES ATTACHED

- Appendix A Draft response letter
Appendix B Plan of areas of the Regional Park within the administrative boundary of the LB Hackney
Appendix C Key diagram as shown in the draft Local Plan
Appendix D Green Infrastructure diagram and definitions of Green Chain and

Green Corridor as stated in the draft Local Plan.

LIST OF ABBREVIATIONS

| | |
|--------------|--|
| PDF | Park Development Framework |
| SINC | Site of Importance for Nature Conservation |
| The Park Act | Lee Valley Regional Park Act 1966 |
| GLA | Greater London Authority |



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4th December 2018

Dear Natalie

Hackney A Place for Everyone: Local Plan 2033 Consultation Oct 2016

Thank you for consulting the Regional Park Authority on the draft Local Plan 2033 'Hackney A Place for Everyone'. This document is due to be considered by the Authority's Members at the Regeneration and Planning Committee on the 14 December 2017. The following is therefore an officer level response to meet the 4th December deadline. A final formal response will be issued as soon as possible after the committee.

Spatial Objectives and Growth Strategy

The Authority welcomes the opportunity to comment on the draft Local Plan. The spatial objectives set out to guide future growth are supported particularly, the emphasis on creating an environment that promotes health and wellbeing (objective 1), creating liveable and accessible neighbourhoods (objective 6), protecting and enhancing open spaces and green links between these spaces (objective 8) and the objective to become a carbon resilient borough improving air quality and reducing the heat island effect (objective 9). As an important element of the Borough's green infrastructure adjacent to major residential and business populations, these are all objectives to which the Regional Park can contribute.

It would be helpful if greater emphasis could be placed on biodiversity under Objective 8, to note that the protection and enhancement of existing and new open spaces and green links has an inherent value for biodiversity as well as people's awareness and enjoyment of it i.e. access to nature.

The Park's significant open spaces, leisure and ecological resources, and strategic pedestrian and cycle routes are well placed to benefit both local communities and visitors from across the region. Key areas include Hackney

Marshes, the River Lee and Lee Navigation, parts of the Queen Elizabeth Olympic Park, Middlesex Filter Beds nature reserve, Millfields and Springfield Park and the Lee Valley Pathway and Lea Valley Walk, (a total of approximately 197 hectares, or 487 acres). These spaces in turn connect with and provide access to a continuous network of open space and habitats, waterways, paths and cycle routes that open up the wider Regional Park to local residents and visitors.

As stated previously the Authority's adopted proposals for the future use and development of the Park within Hackney the Area 2 Proposals - The Three Marshes: Walthamstow, Leyton and Hackney can be found here <http://www.leevalleypark.org.uk/en/content/cms/corporate/enhancing-the-valley/park-development-framework/>

Lea Valley Edge

The Authority notes proposals for renewal and intensification include previously developed land along the 'Lea Valley Edge' also identified as an 'Enhance Corridor', both illustrated on the Key Diagram as land adjacent to the Regional Park. This growth corridor is seen as benefiting from the proximity of the River Lea and enhancing access to the Regional Park.

More detail should be provided in the draft Plan as to what this will mean in practice. Policy guidance is needed as to how mixed use housing led development at increased densities within this sensitive corridor adjacent to the Regional Park will avoid adverse impacts on the openness of the Park and its associated waterways, minimise disturbance, air and light pollution and the shadowing of waterways and protect valuable leisure, heritage and ecological assets whilst also improving access.

Both Policy 1 'Design Quality and Local Character' and Policy 49B 'Development Alongside Waterways and Canals' address some of these issues and are supported. Clarification is sought however as to whether these will apply in a growth corridor such as the Lea Valley Edge where there is pressure to intensify development in an area of lower density adjacent to important waterway and open space assets.

Strategic Cultural Areas

Draft Local Plan Policy 9 'Arts Culture and Entertainment facilities' which recognises the benefits and contribution that arts, culture and entertainment makes to the vitality and prosperity of the local and London wide community is supported. Recognition of the important role of the Regional Park and the Olympic Park in this respect as 'Strategic Cultural Areas' (par.3.10) is welcomed. An additional reference, to the Lee Valley Ice Centre, Lea Bridge Road should be included in supporting text under Policy 9. This is an important community asset located on the borough boundary with Waltham Forest. The Authority is seeking to redevelop the existing site to deliver a new and enhanced ice centre venue.

Walking and Cycling

The Authority welcomes the Council's commitment to creating liveable and sustainable neighbourhoods and the role that walking and cycling can play in achieving this. Policy 38 which seeks to ensure all new development prioritises walking and cycling is endorsed in particular and 38B (iv) which makes reference to improved wayfinding including links to green spaces and towpaths. This will support delivery of the Authority's PDF Area 2 visitor proposals, under 2.A.7 Hackney Marsh which state "*Improve the quality and accessibility of walking and cycling routes into the Park from the residential areas to the west and improve existing bridge crossings over the Navigation*". Similar proposals apply to South and North Millfields under 2.A.5.

The detail in the cycling policy is also supported, especially the emphasis on developer contributions towards provision of cycle parking and cycle hire schemes. The Authority's Cycling Strategy April 2017 supports the need to develop cycle hire, cycle parking and cycle hubs in neighbouring boroughs – secured covered facilities in which cyclists can leave their bikes.

Hackney's Green and Public Spaces

The Authority endorses Policy 42 which seeks to ensure all new development will enhance the network of green infrastructure and green chains across the borough and improve access to open space. Improving access to the Regional Park from across the borough particularly from the west and south where there is deficiency in public access to open space should be a focus for policy delivery. The potential to create new Green Chains as identified on Map 2, running from the south west to north east through to the Park at Millfields and to the Springfield/Walthamstow Marshes area is supported. A dedicated cycle/pedestrian route linking Woodberry Wetlands to Walthamstow Wetlands should be explicitly identified in this section.

Policy support for the Regional Park and PDF Proposals under 42F Lee Valley Regional Park is welcomed. These state:

- i. Development proposals in proximity to the Lee Valley Regional Park should improve access and links to the Park and waterways.
- ii. The Council will work cooperatively with the Lee Valley Regional Park Authority to deliver the Lee Valley Park Development Framework Area Proposals.

This will be an important element of the policy guidance for the regeneration of the Lea Valley Edge growth corridor.

Reference to the Area proposals under Policy 49C Residential Moorings is supported. The Authority has been working with the Canal & River Trust to inform their draft Mooring Strategy. However more specific proposals are required.

Biodiversity

Policy 43 'Biodiversity and Sites of Importance for Nature Conservation' recognises the need to look beyond borough boundaries when considering

the impact of development on sites of nature conservation importance. Specific mention of the Walthamstow Reservoirs SPA and Walthamstow Marshes SSSI both within the Park are welcomed. There is a need for more detail in relation to the Lea Valley Edge growth corridor and what measures will be taken to enhance and protect the Lee Navigation SINC. Supporting text under this policy should be amended to ensure all development (not just major developments) is required to include a biodiversity survey of the site (paragraph 8.7).

PDF Area Proposals make specific reference to joint working with Hackney and the EA to develop "waterside biodiversity and its integration with the Navigation and key sites such as Middlesex Filter Beds (2.A.5). Additional text to complement the PDF Area Proposals for this area would be welcome.

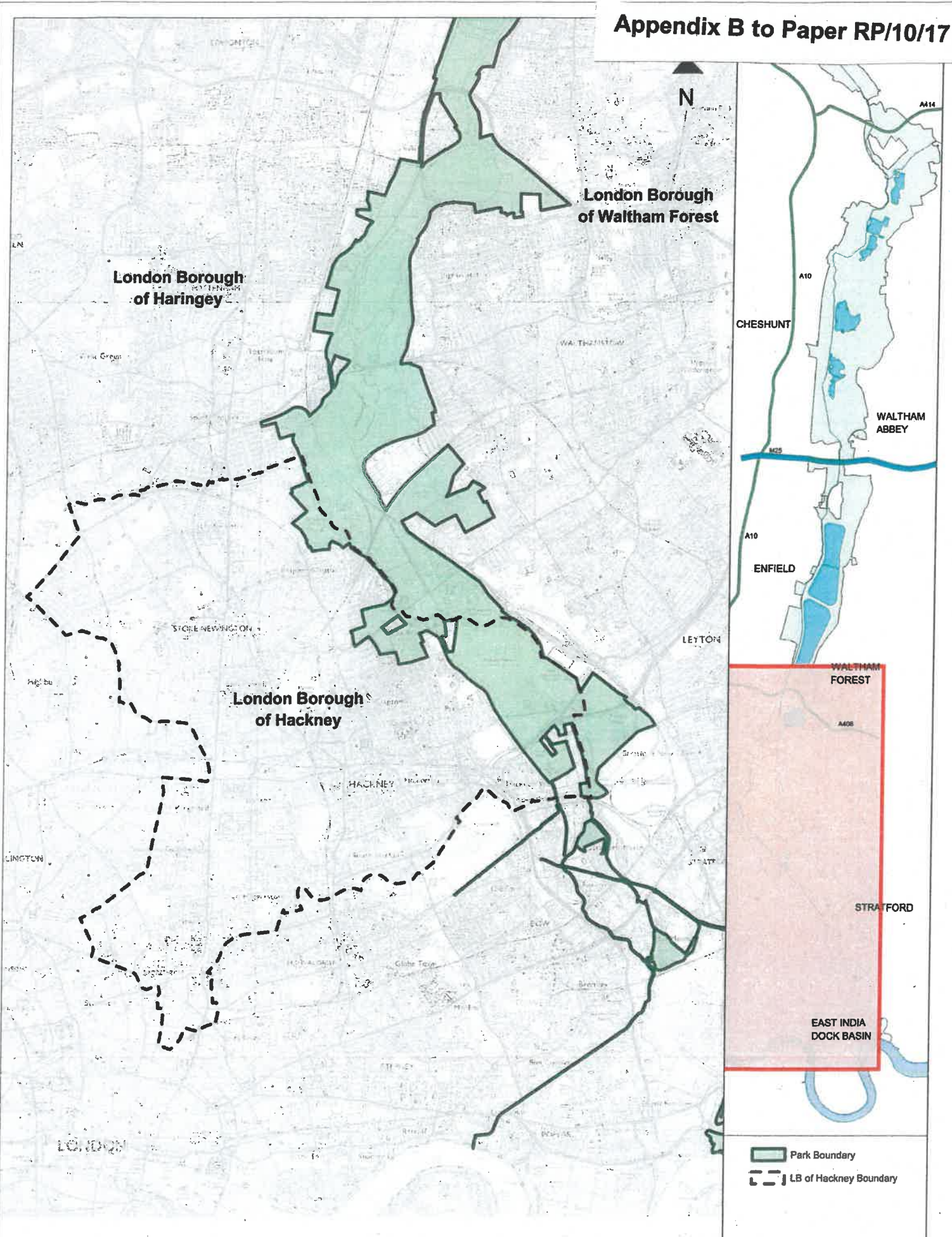
Climate Change

The Local Plan policies on climate change are noted. Officers previously raised as an issue the role of open spaces and other green infrastructure within the Borough, in helping to mitigate for over heating and air pollution and the contribution to flood water management and storage. Policy still needs to consider the impact of climate change on the way open spaces are used and how future management of open spaces, habitats and waterways might need to change, for example areas of parkland and open space will become increasingly important to control and store flood waters which means they might not always be available for public use. This may need to be built into policy on green infrastructure.

The Authority would welcome further involvement in the Local Plan 2033 as it progresses.

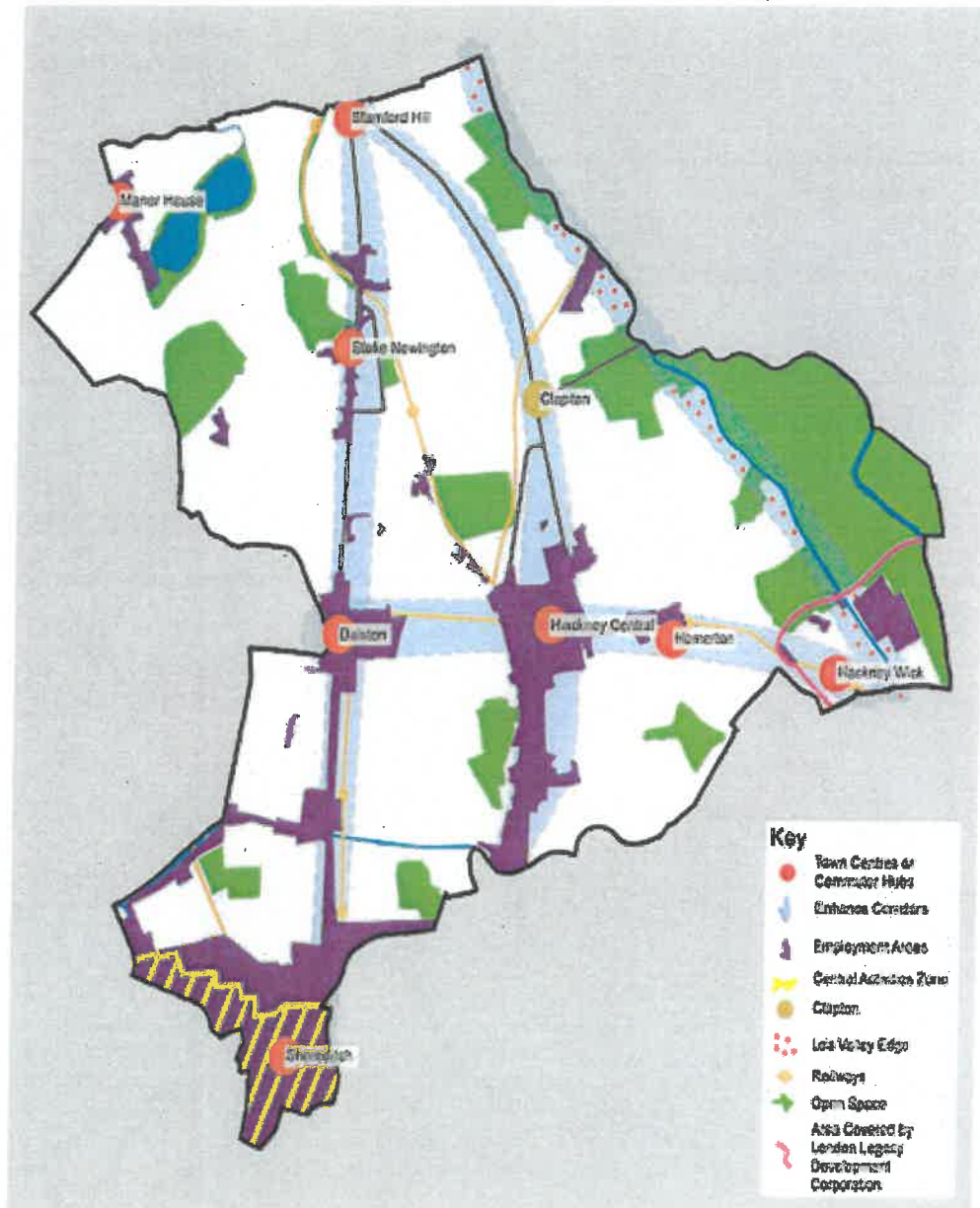
Yours sincerely

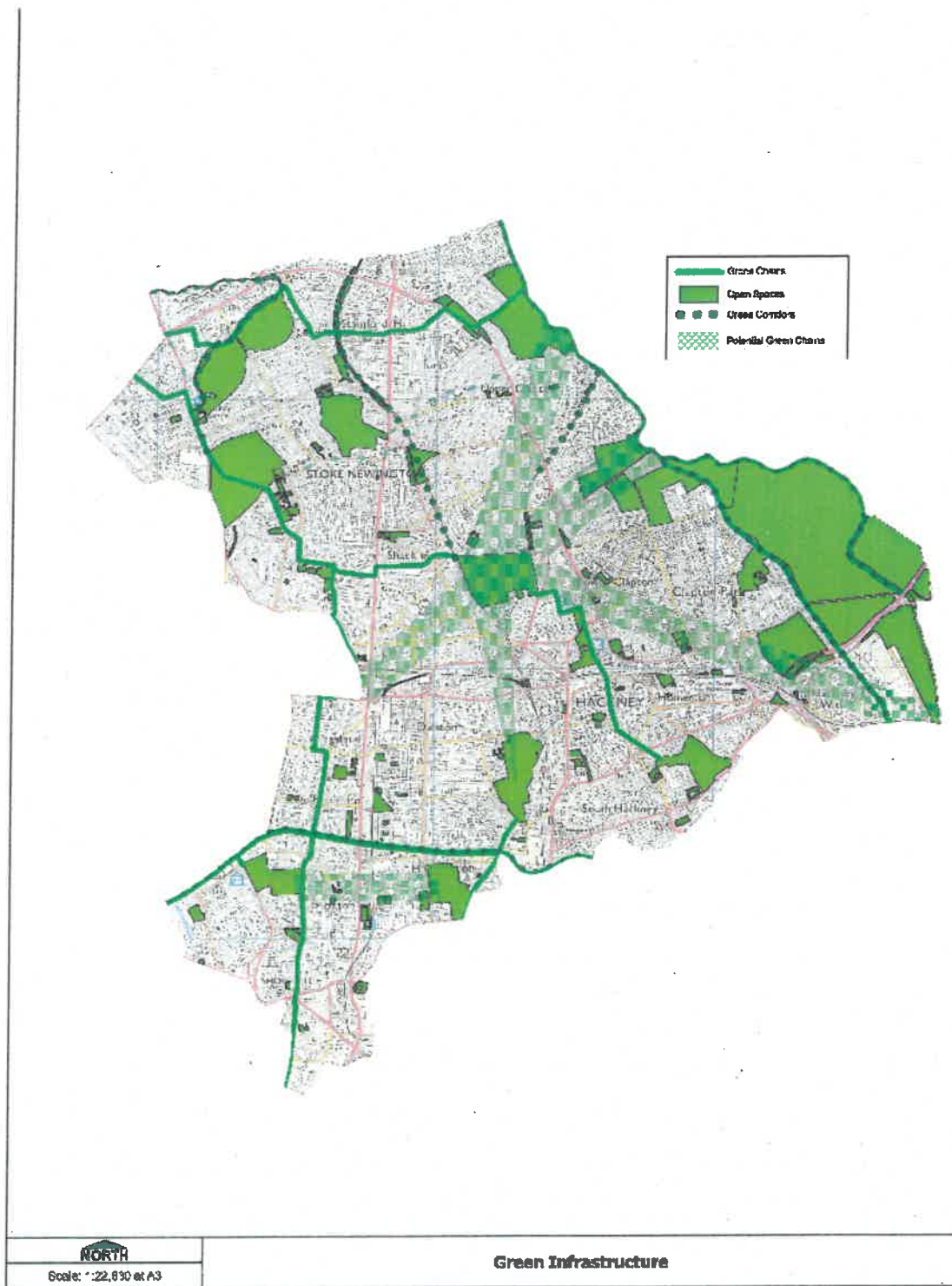
Stephen Wilkinson
Head of Planning and Strategic Partnerships
Lee Valley Regional Park Authority



Park Area within LB of Hackney

Key Diagram 1





Green Chains connect publicly accessible green spaces to each other within Hackney's boundaries and beyond. Green Chains act as an extension of the green spaces that they connect, and should follow the ten Healthy Streets indicators.

Green Corridors are relatively continuous areas of open space leading through the built environment, which may be linked and may not be publicly accessible. They may allow animals and plants to be found further into the built-up area than would otherwise be the case and provide an extension to the habitats of the sites they join.

