

To: David Andrews (Chairman) Heather Johnson
 Chris Kennedy (Vice Chairman) Graham McAndrew
 Ken Ayling Gordon Nicholson
 John Bevan Paul Osborn
 David Gardner John Wyllie
 Calvin Horner

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

THURSDAY, 19 SEPTEMBER 2024 AT 11.30AM

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 25 April 2024 (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 LONDON BOROUGH OF NEWHAM DRAFT SUBMISSION LOCAL PLAN REGULATION 19 CONSULTATION Paper RP/84/24

Presented by the Head of Planning

- 6 LONDON BOROUGH OF WALTHAM FOREST LOCAL PLAN PART 2 SITE ALLOCATIONS PROPOSED SUBMISSION VERSION CONSULTATION Paper RP/85/24

Presented by the Head of Planning

- 7 PLANNING CONSULTATION BY EPPING FOREST DISTRICT COUNCIL
INSTALLATION OF HARDSTANING FOR USE OF LAND IMMEDIATELY TO THE EAST OF MEADGATE WORKS FOR A MIX OF CLASS B2 (GENERAL INDUSTRIAL) AND CLASS B8 (STORAGE AND DISTRIBUTION) USE WITH ASSOCIATED HARD AND SOFT LANDSCAPING; NEW PLANTING AND OTHER SOFT LANDSCAPING ON THE LAND IMMEDIATELY TO THE NORTH OF MEADGATE WORKS; AND THE PROVISION OF A NEW NORTH-SOUTH PEDESTRIAN/BICYCLE ROUTE TO THE EAST OF THE NORTH LAGOON.
AT MEADGATE WORKS, MEADGATE ROAD, NAZEING, EN9 2PD REF: EPF/1330/24 Paper RP/86/24

Presented by the Head of Planning

- 8 PLANNING CONSULTATION BY EPPING FOREST DISTRICT COUNCIL
PROPOSED 49.99MW GAS FIRED ELECTRICITY GENERATING FACILITY (PEAKING PLANT) WITH ASSOCIATED INFRASTRUCTURE, ACCESS AND LANDSCAPING (REVISED SCHEME TO EPF/0800/20), REF: EPF/1419/24
AT POPLAR FARM (WEST SITE), HAMLETT HILL, ROYDON, CM19 5JY Paper RP/87/24

Presented by the Head of Planning

- 9 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.
- 10 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)**

- 11 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 2024

Shaun Dawson
Chief Executive

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LEE VALLEY REGIONAL PARK AUTHORITY

**REGENERATION & PLANNING COMMITTEE MINUTES
25 APRIL 2024**

Members Present: Chris Kennedy (Vice Chairman) Heather Johnson
Ken Ayling Gordon Nicholson
John Bevan Paul Osborn
David Gardner Richard Thake (Deputy Member for Graham
Calvin Horner McAndrew)

Apologies Received From: David Andrews, Graham McAndrew, John Wyllie

In Attendance: Susan Barker

Officers Present: Beryl Foster - Deputy Chief Executive
Claire Martin - Head of Planning
Jon Carney - Corporate Director
Cath Patrick - Conservation Manager
Dan Buck - Corporate Director
Marigold Wilberforce - Head of Property
Julie Smith - Head of Legal
Lindsey Johnson - Committee Services Officer

Part I

212 DECLARATIONS OF INTEREST

There were no declarations of interest.

213 MINUTES OF LAST MEETING

THAT the Minutes of the Regeneration & Planning Committee meeting held on 29 February 2024 be approved and signed.

214 PUBLIC SPEAKING

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

Calvin Horner arrived during the next item.

**215 LONDON BOROUGH OF WALTHAM FOREST ON
THE DRAFT LEYTON MILLS SUPPLEMENTARY
PLANNING DOCUMENT**

Paper RP/80/24

The report was introduced by the Head of Planning, informing Members that we are largely supportive of the Draft Leyton Mills Supplementary Planning Document, but have requested some changes to the site specific guidance text for Eton Manor to ensure the site's expansion and improvement of the sporting and recreational offer. The Chairman of the Authority felt that the requested changes for Eton Manor focussed too heavily on sport and

REGENERATION & PLANNING COMMITTEE MINUTES 25 APRIL 2024

that we should also mention Part Act compliant uses and development such as visitor accommodation. The Head of Planning responded, stating that this could be included under their 'Metropolitan Open Land (MOL) and Sporting Provision' section (page 17).

A Member asked if Suitable Alternative Natural Green Space (SANGS) meant that if we build on MOL at Eton Manor we would need to find another area to green within London Borough of Waltham Forest (LBWF). The Head of Planning responded stating that LBWF already have a SANGS Strategy which we were consulted on, their proposals for green uplift at Eton Manor are different in their SANGS Strategy to what is being proposed in their Supplementary Planning Document, so we need to seek clarity. We are committed to working with them to improve the entrance to Eton Manor and other links within the Olympic Park.

A Member asked about 18+ storey buildings and their impact on the Park when they border our land. The Head of Planning responded stating that we would wish tall buildings to step down when bordering our land and that our concern with 18+ storey buildings is that there is no set limit on their height.

(1) the comments as set out in Appendix A to Paper RP/80/24 as the Authority's formal response to the consultation by the London Borough of Waltham Forest on the draft Leyton Mills Supplementary Planning Document was approved with the following amendment:

(a) a sentence be added to the 'Metropolitan Open Land and Sporting Provision' section to make mention of our remit for recreation and visitor accommodation as Park compliant development which could take place at Eton Manor. The wording to be delegated to the Head of Planning in consultation with the, Chairman and Vice Chairman of the Regeneration & Planning Committee and the Chairman of the Authority.

216 LONDON BOROUGH OF ENFIELD PRE-SUBMISSION
REGULATION 19 CONSULTATION ON THE DRAFT
LOCAL PLAN 2019-2041

Paper RP/81/24

The report was introduced by the Head of Planning informing Members that matters still outstanding from the previous consultation relate to lack of policy support for the Park, its remit, the Park Development Framework and the need for minor amendments to the text on Picketts Lock.

A Member suggested that we highlight again the pressure that the Park faces from developments which result in greater visitor numbers. The Vice Chairman replied stating that this could be added somewhere within the letter.

A Member queried why their Local Plan is seeking 20% Biodiversity Net Gain (BNG) when the government have set it at 10%. The Head of Planning responded stating that Local Authorities are allowed to set a higher percentage, however, they will need to justify it to the Planning Inspectorate, London Borough of Enfield might argue that they have set it at 20% to help rewild their borough.

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A Member asked whether there is ambition to reduce the large car park at Picketts Lock due to modal shift, meeting CO2 emissions and helping to green the area. The Head of Planning responded stating that we would want to keep the current site allocation at Picketts Lock in order to facilitate any future projects there as car parking would be a key issue for any future planning applications. The Deputy Chief Executive added that due to the lease we have with the cinema at the site we are obliged to provide approximately 1073 car parking spaces. The Head of Planning added that public transport is an issue for that site. The Member added that ambition to improve public transport should also be included in the Local Plan. The Head of Planning responded that this is mentioned on Page 22 of Paper RP/81/24, where development of the site would require improvements to bus routes along with improved pedestrian/cycle routes.

(1) the representations as set out in Appendix A to Paper RP/81/24 as the Authority's formal response to consultation by the London Borough of Enfield on the Pre-Submission draft Local Plan 2019 – 2041 as approved, with the following addition:

(a) highlight in the letter the pressure that the Park faces from developments resulting from greater visitor numbers.

217 PLANNING CONSULTATION BY EPPING FOREST DISTRICT COUNCIL Paper RP/82/24
BARNFIELD RIDING STABLES, SEWARDSTONE ROAD,
WALTHAM ABBEY, E4 7RH
OUTLINE APPLICATION (ALL MATTERS RESERVED EXCEPT FOR MEANS OF ACCESS TO, BUT NOT WITHIN, THE SITE), FOR PROPOSED MIXED USE DEVELOPMENT COMPRISING RESIDENTIAL (UP TO 81 NO. UNITS) WITH OPEN SPACE & PLAY AREA TOGETHER WITH RELOCATION OF EXISTING RIDING SCHOOL (REVISED SCHEME TO EPF/2594/21)

The report was introduced by the Head of Planning, who informed Members that we looked at a similar application for this site two years ago. The changes are that they have reduced the number of residential units to 81 and taken out the community building. They still wish to relocate the stables further into the site and develop a new road. Our concerns are that there are no public transport links to support the development and the site is not included in Epping Forest District Council's Local Plan for housing. It is recommended that an objection is made on similar grounds as previously raised.

A Member asked whether the indicative costs at Appendix C had been uplifted. The Head of Planning responded stating that the costs at Appendix C have not been uplifted and would only come into play if the application was approved, at which point we would go back through it and re-cost.

A Member asked that as the site is within the Park, what power we had over the land. The Head of Planning responded stating that as we are a statutory consultee not the land owner, it would be for the Local Planning Authority to decide.

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- (1) that Epping Forest District Council be informed that the Authority objects to the revised outline application for the proposed mixed use development at Barnfield Riding Stables on the grounds that:
- a) the extent and density of the residential component places new built elements such as the new road and car parking within the more open areas of the site, and together with the relocated Equestrian Centre positioned adjacent to Sewardstone Marsh draws the built and urban character associated with Sewardstone Road well into the more open areas of the Park and the Green Belt. This will impact negatively on the open character and landscape of the Regional Park and visitor enjoyment and use of the Park's adjacent recreational and biodiverse spaces;
 - b) the location of the new access to the open space and play area and relocated equestrian centre as proposed from Godwin Close is likely to have a detrimental impact on the pedestrian and cycle entrance point into the Regional Park which sits adjacent;
 - c) concern remains about the location of the application site, its distance from neighbouring towns and the lack of connectivity between the proposed development and local services and facilities, including public transport;
 - d) the lack of up to date ecological information which is required to inform the development and identify any impacts it might have on designated sites, protected and Priority Species and habitats and any appropriate mitigation required;
- (2) that should the Council be minded to approve the application then the Authority would wish to see conditions included to ensure that:
- a) the site layout is revised to reposition the facility buildings for the Equestrian Centre closer to the residential area away from the Park's boundaries to the west and south, thereby also reducing the length of new roadway required in order to minimise the impact on the open character and landscape of the Regional Park and visitor amenity;
 - b) the landscape design for the public open space makes provision for a range of recreational uses including dog walking/exercise and play, includes space for wildlife and incorporates wildlife friendly planting;
 - c) existing boundary hedges, scrub and trees around the southern and western boundaries of the site are retained, protected and enhanced as wildlife corridors, and buffer habitat between the Park, site access points and activities on the development site, and that additional planting on the western boundary should avoid shading the existing ditch;

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- d) the design of the new site access off from Godwin Close takes account of visitor access into the Park and the Authority's operational access requirements, giving priority to pedestrians and cyclists at this entrance point to the Park;**
 - e) a lighting strategy is provided and designed, in accordance with the 'Institution of Lighting Professionals Guidance Note 08/23 (2023), Bats and Artificial Lighting at Night', both for the construction period and once the sites are occupied to take account of the adjoining Park areas and designated species;**
 - f) the badger survey is updated taking account of areas outside the application site to ensure development, including the construction phase will not impact on this protected species;**
 - g) a biodiversity enhancement plan is provided demonstrating a 10% gain in biodiversity and the incorporation of biodiversity enhancements within the development, including integrated bat bricks, bird boxes and hedgehog access points;**
 - h) Section 106 monies and/or SANGs contributions are allocated to the Regional Park area adjacent to the development for access and habitat enhancements to mitigate for recreational impacts as outlined in the attached Schedule at Appendix C; and**
- (3) that Epping Forest District Council be informed that the Authority would wish to be consulted on the above matters was approved.**

218 PREPARING FOR BIODIVERSITY NET GAIN

Paper RP/83/24

The report was introduced by the Head of Planning, where Members were informed that the Executive Committee had received the report attached as Annex A to Paper RP/83/24 earlier this morning and approved the recommendations, with the addition under recommendation 3 that officers would offer a discussion with the Authority as to any assistance it may be able to consider providing in relation to the BNG process.

A Member suggested that we might like to offer a paid consultancy service on Biodiversity Net Gain to riparian authorities where planning applications fell within the Park or would impact upon the Park. The Deputy Chief Executive responded stating that this is something we could look into.

- (1) the content of Executive report E/850/24 attached as Annex A to Paper RP/83/24 and the recommendations as regards the Authority's planning consultee role were noted.**

**REGENERATION & PLANNING COMMITTEE MINUTES
25 APRIL 2024**

Chairman

Date

The meeting started at 11.30am and ended at 12.20pm.



LEE VALLEY REGIONAL PARK AUTHORITY

**REGENERATION AND PLANNING
COMMITTEE**

19 09 2024 AT 11:30

Agenda Item No:

5

Report No:

RP/84/24

**LONDON BOROUGH OF NEWHAM DRAFT SUBMISSION
LOCAL PLAN REGULATION 19 CONSULTATION**

Presented by the Head of Planning.

SUMMARY

The London Borough of Newham (the Council) are consulting on their draft Submission Local Plan (Regulation 19), following the consideration of responses to the two previous rounds of consultation, most recently the Regulation 18 stage in 2023. The draft submission Local Plan includes the area of the borough that falls within the London Legacy Development Corporation (LLDC) planning authority and will therefore be relevant to the Lee Valley VeloPark and associated Lee Valley Regional Park (Regional Park) area within the Queen Elizabeth Olympic Park (QEOP) and the Three Mills Island.

This report is focused on whether the Pre-Submission Local Plan addresses the concerns previously raised by the Lee Valley Regional Park Authority, (the Authority) most recently in 2023 when a detailed response was made to the draft Regulation 18 Local Plan. It takes into account the Council's response to consultee comments as set out in their 'Regulation 18 Consultation Report' and discussions that were held with officers from the Council.

Although a number of positive changes have been made to both policy and supporting text within the draft Local Plan further modifications are considered necessary to fully address matters relating to the Regional Park, the remit of the Authority and the detail of the Park Development Framework. It is considered these changes are needed to improve the soundness of the Local Plan.

The letter attached as Appendix A to this report sets out the Authority's draft formal representations both those supporting, and those seeking modifications to improve the soundness of the Local Plan. The Table at Appendix C to this report provides a summary of the Authority's previous comments to the Regulation 18 version of the Local Plan and sets out the Council's response to each of the matters raised.

RECOMMENDATIONS

- Members Approve: (1) the comments as set out in Appendix A to this report as the Authority's formal representations to the consultation by the London Borough of Newham on the draft Submission Local Plan Regulation 19 document.

BACKGROUND

- 1 Newham Council have reached the final consultation stage for their draft Local Plan and have issued the Submission version for consultation and comment. This follows and has been informed by, the responses to the previous two consultations: Issues & Options (2021) and Regulation 18 (2023). The Authority commented in some detail at both stages most recently in February 2023 (Paper RP/68/23). The Council intend to submit this draft Submission Local Plan to the Planning Inspectorate for Examination in March 2025.
- 2 The Local Plan contains the vision, objectives, spatial strategy and planning policy framework which will guide decisions on development and regeneration in the Borough to 2038. The draft Submission Local Plan aims to deliver Newham's key objectives: inclusive growth, delivering a fairer Newham and addressing the climate emergency. It is informed by a wide range of evidence base documents which have provided research on specific aspects of the Local Plan, and by Council and regional strategies and area specific guidance. An updated Infrastructure Development Plan (IDP) is also included. This supports projects identified in the emerging Local Plan evidence base required to support growth identified under the new Local Plan. These align with the infrastructure requirements outlined in the site allocations and neighbourhood policies in the emerging Local Plan. Future development and enhancement of the Lee Valley VeloPark is now listed in the IDP.
- 3 The Regulation 19 consultation stage requires comments to focus on the 'legal compliance' and 'soundness' of the Local Plan including the duty to cooperate. This is defined as whether the Plan has been positively prepared, whether it is justified (based on an appropriate strategy, taking into account the reasonable alternatives), whether it is effective – deliverable and based on effective joint working and consistent with national policy. Representations including any proposed modifications are to be formally made via an online or downloadable representation form by 20th September.
- 4 It should be noted that the Local Plan covers the entirety of Newham including the area in which the London Legacy Development Corporation (LLDC) is currently the Local Planning Authority. LLDC's planning powers are due to be handed back to Host Boroughs (Waltham Forest, Hackney, Newham and Tower Hamlets) by the end of 2024 and Newham are working with the LLDC, the Mayor of London and other Host Boroughs to plan proactively in advance of this transition, so that a Plan which covers the whole borough is under preparation at the point of transition.
- 5 The Regional Park within the London Borough of Newham includes Bow Creek Ecology Park and part of the Greenway. Other sections of the Regional Park, including Three Mills Island, significant parts of the Queen Elizabeth Olympic Park (QEOP) - the Lee Valley VeloPark and land consisting of the northern parklands lie within the 'Newham component' of the LLDC. Please refer to the

Plan at Appendix B to this report which shows these areas of the Regional Park within Newham.

- 6 The Authority's Park Development Framework Area 1 Proposals 'Tidal Reaches to Queen Elizabeth Olympic Park', therefore apply. These aim to develop and promote the Lee Valley VeloPark as a world class cycling venue for track, BMX, road and mountain biking, increasing participation at all levels. They also seek 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. Proposals support the use of open spaces for informal recreation and play, and seek to maintain and enhance the ecological connectivity along towpaths and linear routes such as the Greenway and the Leaway.
- 7 The Authority responded in detail to the Regulation 18 draft Local Plan (Report no. RP/68/23) 23 February 2023 followed by a number of discussions between officers from Newham and the Authority. The Council's response to all the comments made has been summarised in the 'Regulation 18 Consultation Report' and this provides further insight into the Council's view on those matters raised by the Authority and the framing of relevant policies in terms of the Regional Park in Newham. Most of the Authority's comments have been addressed with amendments to both policy and supporting text. However further modifications are felt necessary to strengthen these additions and provide clarity regarding the statutory requirements in respect of the Regional Park and the Authority's remit. The Authority's draft formal representations both those supporting, and those seeking modifications to improve the soundness of the Local Plan are set out in the letter attached at Appendix A to this report.

CHANGES TO LOCAL PLAN POLICY IN RELATION TO THE ISSUES PREVIOUSLY RAISED BY THE AUTHORITY AND MATTERS OUTSTANDING

- 8 Table 1 at Appendix C to this report provides a summary of the Authority's previous comments to the Regulation 18 version of the Local Plan and sets out the Council's response to each of the matters raised (as presented in Newham's Regulation 18 Consultation Response) indicating where changes have been made to the draft Local Plan. The final column in Table 1 indicates where further changes are considered necessary to ensure the Plan can be considered Sound and legally compliant.
- 9 The main matters that require further changes to policy and/or supporting text are set out in the letter attached at Appendix A to this report and summarised below. Support for changes to policy is also provided where this is relevant to the Regional Park within Newham.
- 10 **Policy BFN1.5 - Support for the Lee Valley Regional Park**

A new policy BFN1.5h has been included as part of the Council's Spatial Strategy. This now includes reference to the Regional Park, the Park Development Framework (PDF) and the Park Act. Whilst this new policy can be welcomed and supported further modification to the policy text and implementation text are required to clarify the intent of policy and ensure the Local Plan can be considered sound. This additional text is set out in the letter attached at Appendix A to this report.

11 Support for the Lee Valley VeloPark and the QEOP

The Authority also sought the inclusion of policy support within the Local Plan for the growth and diversification of major sporting venues and visitor attractions such as the Lee Valley VeloPark. The Authority was seeking a similar level of support to that contained within the LLDC Local Plan which includes a statement supporting the Lee Valley Velopark and the work of the Authority as it seeks to improve and grow the offer associated with the venue and thereby ensure its long term sustainability.

12 Newham have responded by adding new wording to the Justification text under Policy SI3 'Cultural facilities and sport and recreation facilities'. This states:

3.139 Newham is home to the Queen Elizabeth Olympic Park, the London Stadium, Aquatic Centre and the Lee Valley Velopark, all of which are a lasting legacy from the 2012 Olympic Games. These are world class facilities and important national leisure and sporting venues. The Lee Valley Velopark is owned by the Lee Valley Regional Park Authority and is managed through its leisure trust. Newham continues to work closely with and support the Park Authority as it seeks to improve and grow the offer, thereby ensuring its long term sustainability.

The new wording in the Justification text mirrors the support within the LLDC Local Plan which was also part of supporting text and should be supported. A minor change is required to refer to a leisure trust rather than 'its' leisure trust.

13 This addition to the Local Plan gives the Authority some comfort in planning terms with future proposals for the VeloPark, given the Metropolitan Open Land (MOL) and Green Space designation that applies to the QEOP and Regional Park. It should also be read alongside the support given to the PDF and the Regional Park under Policy BFN1.5h. Under this policy development which supports the Lee Valley Regional Park and the PDF will contribute to Newham's spatial strategy and objectives to create and enhance social infrastructure such as sports facilities, parks and open spaces.

14 The Infrastructure Delivery Plan (IDP) 2024, under the Sport and Recreation section, now references the Lee Valley VeloPark and the Authority's "on-going work to seek to improve and grow the offer, thereby ensuring its long term sustainability". The development and enhancement of the Lee Valley VeloPark is listed as a major sport and recreation facilities project within the Local Plan. This indicates that the Council consider improvements and the growth of the Lee Valley VeloPark as infrastructure important to place-making and sustainable development within the Borough.

15 Additional justification text is sought to reference the wider offer that the Regional Park provides to Newham's communities. This wording is set out in the letter at Appendix A to this report.

16 Metropolitan Open Land Designation

It should also be noted that the Velodrome has been removed from the MOL designation following a review of the MOL and Green Belt across the Borough. The Policies Map retains the MOL designation for the outdoor cycling tracks and now shows an additional notation for these as 'Sports Facilities in Green Space.'

Policies GWS1 'Green Spaces' and SI1 'Existing Community Facilities and Health Facilities' apply.

- 17 This amendment to the MOL boundary is based on an assessment of the Olympic Park MOL area, (known as MOL Area 32) that was recently undertaken as part of Newham's MOL and Green Belt Review 2024. It found that:

"built development is largely absent from the parcel, with the iconic and structural buildings in the Queen Elizabeth II Olympic Park (QEOP) sitting outside of the MOL designation. Whilst the sense of openness is well-defined there is localised erosion by the Lee Valley Velo Park building in the north of the parcel. It is proposed to remove the Lee Valley Velo Park building to the north of the parcel from the MOL parcel. This would take a consistent approach with the London Stadium, which does not form part of the adopted MOL parcel. The proposed re-organisation of the MOL will form a more coherent parcel of MOL while protecting the core function of the site as a key structural feature in both the Queen Elizabeth II Olympic Park and the Lee Valley Regional Park."

- 18 It is understood this approach is consistent with the treatment of the London Stadium, which does not form part of the adopted MOL parcel. However the area of the QEOP surrounding the Velodrome, will remain as MOL, albeit that the Policies Map now recognises the outdoor cycling facilities associated with the venue as Sports Facilities in Green Space. Policy GWS1 will apply and this seeks to ensure development provides or helps to deliver easy access to a network of high-quality green spaces which for the areas of MOL such as the wider VeloPark area would require the open character of the area to be maintained. The Implementation text associated with GWS1b is helpful. This states:

"Within areas of Metropolitan Open Land and Green Belt, development that is more likely to either be capable of maintaining its openness or exceptionally, meet the very special circumstances test, is development which would enhance the quality and function of the MOL or Green Belt. For example, this could be providing new or enhanced outdoor recreation facilities or enabling alteration or replacement of existing buildings."

19 Neighbourhoods

The letter attached at Appendix A to this report supports the references to the Regional Park that have been added to the Local Plan Neighbourhood policies. These additions relate to three neighbourhoods which incorporate parts of the Regional Park within their areas; namely 'Stratford and Maryland', 'Three Mills', and 'Canning Town and Custom House'. The Regional Park is also now listed in the pro-forma for all the relevant site allocations (please refer to Appendix D) within the above neighbourhoods as a relevant site designation under the category Natural Environment Designation.

ENVIRONMENTAL IMPLICATIONS

- 20 There are no environmental implications arising directly from the recommendations in this report but the draft Local Plan for Newham once adopted will contain policies and allocations 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

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

HUMAN RESOURCE IMPLICATIONS

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

LEGAL IMPLICATIONS

- 23 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.
- 24 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

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

EQUALITY IMPLICATIONS

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

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BACKGROUND REPORTS

The London Borough Newham Consultation on the August 2024 Newham draft Pre-Submission Local Plan Regulation 19 document

PREVIOUS COMMITTEE REPORTS

Regeneration and Planning committee	RP/56/21	London Borough of Newham Local Plan Refresh Issues and Options stage consultation	16 12 2021
Regeneration and Planning committee	RP/68/23	London Borough of Newham Local Plan Reg 18 Consultation	23 02 2023

APPENDICES ATTACHED

Appendix A	The Authority's draft response to the London Borough of Newham
Appendix B	Plan showing the Regional Park area within the borough of Newham
Appendix C	Table 1 Assessment of Pre-Submission Local Plan
Appendix D	Plan showing Site Allocations adjacent to the Regional Park

LIST OF ABBREVIATIONS

LLDC	London Legacy Development Corporation
PDF	Park Development Framework
QEOP	Queen Elizabeth Olympic Park
IDP	Infrastructure Delivery Plan
LVRPA	Lee Valley Regional Park Authority
MOL	Metropolitan Open Land

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Appendix A to Paper RP/84/24



Ellie Kuper Thomas
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London Borough of Newham
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19 September 2024

Dear Ellie

RE: CONSULTATION ON THE LONDON BOROUGH OF NEWHAM DRAFT SUBMISSION LOCAL PLAN (REGULATION 19) - LEE VALLEY REGIONAL PARK AUTHORITY REPRESENTATIONS

Thank you for consulting the Lee Valley Regional Park Authority (the Authority) on the draft Submission Local Plan (Regulation 19) document. A report on this matter was considered by the Authority's Members, at the Lee Valley Regeneration and Planning Committee on the 19th September 2024, when the following comments were agreed. These are focused on how far the current draft Local Plan addresses the matters of concern previously raised by the Authority and whether as a result the Authority considers the plan to be sound. The representations set out below include modifications to address the matters still outstanding and will also be formally submitted via the online representation process.

Representations relating to policy support for the Lee Valley Regional Park

Building a Fairer Newham - Policy BFN1 Spatial Strategy

The Authority welcomes the proposed changes made under Policy BFN1 Spatial Strategy which adds policy support for the Lee Valley Regional Park and the Park Development Framework.

The Authority, in its previous responses has highlighted the important contribution that the Regional Park makes to the borough, particularly given the imminent return of planning powers back to Newham Council from the LLDC in 2024 and the fact that significant areas of the Regional Park will fall within the jurisdiction of the Local Plan. The Regional Park within Newham is a significant element of the Borough's green and blue infrastructure and will provide valuable open and waterside spaces, leisure, sporting, and cultural facilities as well as access to nature, all within close proximity to existing neighbourhoods and new communities.

Hence the Authority's previous comments sought the inclusion of a specific policy statement supporting the Authority's remit, the Regional Park and referencing the Park Development Framework Area proposals as they apply to the Regional Park area within Newham. This would fulfil the mandatory requirements of the Lee Valley Regional Park Act 1966 (the Park Act) Section 14 (2) (a) as it relates to the riparian councils such as Newham. It would also provide context for the Regional Park's spatial designation included on the Policies Map.

Policy BFN1 Spatial Strategy identifies where development and significant change will occur across the borough including the provision of new open spaces and social infrastructure in order to ensure all borough residents live in a network of well-connected neighbourhoods.

The Authority supports the change to Policy BFN1.5 'Spatial Strategy' which now includes policy support for the Lee Valley Regional Park and the Park Development Framework under bullet point h. The additional justification text under paragraph 3.9 is also supported as this clarifies the Regional Park's relationship to the neighbourhoods of Three Mills, Canning Town and Custom House and Stratford and Maryland. Implementation text also now references the Authority's statutory consultee role in respect of the Park Act. All proposed changes made by the Council are set out below in red font for ease of reference.

In order to ensure the Local Plan can be considered sound however it is important that the policy text under BFN1.5 supports both the Regional Park and its remit i.e. as a statutory area set aside for leisure, recreation, sport and nature conservation, and the PDF Area 1 Proposals as they relate to Newham. Reference to the 'vision of the PDF' as set out below is confusing as it is not clear to what this refers. The Area 1 Proposals are not considered to present a vision as such, but represent the 'plan of proposals for the future management and development of the Regional Park' referenced under Section 14 (1) of the Park Act. A minor change to the wording of policy text under 1.5h is needed and this has been set out below in blue italics. Deleted text is shown in red strikethrough

Draft Submission proposed changes in red font. LVRPA proposed revised wording in blue italics

BFN1.5: Spatial strategy

5. Development will protect and enhance existing parks and social infrastructure and support the creation of new parks and social infrastructure by requiring the delivery of:

h. development that supports the ~~vision of~~ the Lee Valley Regional Park, its remit and the Lee Valley Regional Park Authority's Development Framework Area Proposals (Area 1) as they apply to the Park in Newham; and...

The new additional text added to the Justification and Implementation Sections is also noted and supported. Further amendments to the Justification text is proposed to ensure the Regional Park's range of open spaces, sport and leisure venues are referenced as these make a significant contribution to recreational opportunities within the Neighbourhoods.

Further additional wording is proposed under the Implementation Section to ensure the link back to the PDF Area Proposals is clear in relation to planning applications.

Justification text

3.9 The borough's quantity of publicly accessible open space for each person is low, and many areas lack good places for children to play. Despite this overarching deficit, significant areas of the Lee Valley Regional Park lie within the Three Mills, Canning Town and Custom House and Stratford and Maryland neighbourhoods. These include the Lee Valley VeloPark and land consisting of the northern Olympic parklands, the open spaces, film studios, natural play and important heritage contained within the Three Mills Island complex, part of the Greenway, and the Bow Creek Ecology Park. The strategy therefore seeks to make the most of our existing green assets, including the Lee Valley Regional Park, while reducing our spatial and absolute deficits.

Implementation Section – text added for BFN1.5.

Created by the Lee Valley Regional Park Act in 1966, (the Park Act), the Lee Valley Regional Park Authority (LVRPA) is a key stakeholder in the Borough. 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. Within Newham the Regional Park makes a significant contribution to the Borough's green infrastructure resource and its leisure and cultural amenity offering residents and visitors a combination of nationally and internationally important sporting venues, ecologically rich open spaces and local opportunities for recreation and healthy activity.

Newham will consult the Lee Valley Regional Park Authority (LVRPA) on planning applications which it considers could affect the Park. Under the terms of the Lee Valley Regional Park Act (1966), the LVRPA can refer any decisions by Newham 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. The contents of the Lee Valley Park Development Framework, as adopted, is a material consideration in the determination of planning applications.

Reference to the Lee Valley Regional Park Development Framework, under the list of Evidence Base documents included for this policy is also supported.

Tall Buildings

The Authority notes the changes to Policy D4 Tall Buildings and supports the new wording added to the guidance section of Table 1: Tall Building Zones for Canning Town (TBZ13) and Abbey Mills (TBZ16) and corresponding design principles in the relevant site allocations Abbey Mills (N7.SA1), Twelvetreves Park and Former Bromley By Bow Gasworks (N7.SA2), Limmo site (N4.SA4) and Canning Town Riverside (N4.SA5).

This recognises the need for tall buildings in Canning Town zone to assess their visual and townscape impact in the context of existing and permitted tall buildings to ensure the cumulative impact does not saturate the skyline, Canning Town TBZ13. Guidance under TBZ16 Abbey Mills recognises the need to manage the impact on heritage assets as previously raised by the Authority and now states that "Height, scale and massing of development proposals should be assessed to conserve and enhance the

character of heritage assets without detracting from important landmarks and key views, including the Abbey Mills Pumping Station.”

Importantly given the Authority’s concern about the sensitivities of design and placement of new buildings in relation to the waterways and heritage assets, careful consideration must now be given to the location of tall buildings, particularly along the waterways to avoid overshadowing impact on watercourses (TBZ16 with reference to Abbey Mills). Similar guidance regarding heritage assets and watercourses is specified for the former Bromley by Bow Gas works site (part of TBZ15 West Ham Station) this time with reference the Three Mills Conservation area, its important landmarks and key views.

The changes to the wording of Policy D4 and the added detail within the Implementation text (and relevant Site Allocation design principles) clarifies how proposals for tall buildings in proximity to sensitive areas should respond to the historic environment and manage the transition between ‘conserve’ and ‘transform’ areas. Implementation text also now cross references, Policies GWS2 ‘Water Spaces’ and GWS3 ‘Biodiversity Urban Greening and Access to Nature’ which require development proposals for tall buildings to demonstrate consideration of their impact on biodiversity and existing and proposed public open space, including watercourses.

Policy SI3 Cultural Facilities and Sport and Recreation

Leisure, Culture and Sporting Venues

A new reference to the Queen Elizabeth Olympic Park and the Lee Valley VeloPark has been added to the Justification text for Policy SI3 Cultural Facilities, Sport and Recreation, as set out in the box below. As explained in Newham’s ‘Regulation 18 Consultation report’ this additional text clarifies the intent of policy and provides Newham specific detail on the Queen Elizabeth Olympic Park, associated leisure facilities including the VeloPark and makes reference to the Lee Valley Regional Park Authority. Policy SI3, Cultural Facilities and Sport and Recreation is intended to protect and support the growth and diversification of cultural and leisure facilities. Any new and reconfigured culture, sport and recreation facilities will be expected to meet the criteria set out in Local Plan Policy SI2 New and re-provided community facilities and health facilities.

The Authority supports this addition to the Justification text as it provides support for the Lee Valley VeloPark and indicates Newham’s support for the Authority as it seeks to improve and grow the offer associated with the venue and thereby ensure its long term sustainability. This statement also mirrors the supporting text within the LLDC Local Plan which recognises the world class status of the sports facilities at the Lee Valley VeloPark and its importance as a national leisure and sporting venue hosting local, national and international events, together with its role in delivering a sporting legacy for local communities. One small amendment is needed to change ‘its’ leisure trust to ‘a’ leisure trust and this is corrected below in blue font.

It is still considered relevant that the Justification text should also reference the wider offer that the Regional Park provides to Newham’s communities. In particular the Regional Park offers a range of walking and cycling routes through to adjoining areas and venues to the north, and the opportunity for people to enjoy venues such as Lee Valley Hockey and Tennis Centre, (approx. 30mins on public transport and 20mins cycle ride from Canning Town), the open spaces of Hackney and Walthamstow Marshes Nature Reserve and the new Lee Valley Ice Centre, (approx. 15mins cycle ride and 35 mins by public transport from the centre of the QEOP), one of only three

Olympic-sized twin rinks in the UK. This additional text could follow at the end of the paragraph 3.139 as shown below.

Justification

3.139 Newham is home to the Queen Elizabeth Olympic Park, the London Stadium, Aquatic Centre and the Lee Valley Velopark, all of which are a lasting legacy from the 2012 Olympic Games. These are world class facilities and important national leisure and sporting venues. The Lee Valley Velopark is owned by the Lee Valley Regional Park Authority and is managed through a leisure trust. Newham continues to work closely with and support the Park Authority as it seeks to improve and grow the offer, thereby ensuring its long term sustainability.

The Regional Park's offer for Newham's communities also extends beyond the borough boundary with a range of other venues available to residents via walking and cycling routes, such as Lee Valley Hockey and Tennis Centre, the open spaces of Hackney and Walthamstow Marshes Nature Reserve and the new Lee Valley Ice Centre in Waltham Forest, one of only three Olympic-sized twin rinks in the UK.

Metropolitan Open Land

The Authority notes and supports the removal of the Velodrome from the wider Olympic Park MOL designation. It is understood this approach is consistent with the treatment of the London Stadium, which currently does not form part of the adopted MOL parcel.

The remainder of the VeloPark will retain its MOL designation, however the Authority supports the additional designation 'Sports Facilities in Green Space' shown on the Policies Map for the outdoor cycling tracks associated with the venue.

Policy GWS1 will apply and this seeks to ensure development provides or helps to deliver easy access to a network of high-quality green spaces which for the areas of MOL such as the wider VeloPark area would require the open character of the area to be maintained. The Implementation text associated with GWS1b is helpful. This states:

"Within areas of Metropolitan Open Land and Green Belt, development that is more likely to either be capable of maintaining its openness or exceptionally, meet the very special circumstances test, is development which would enhance the quality and function of the MOL or Green Belt. For example, this could be providing new or enhanced outdoor recreation facilities or enabling alteration or replacement of existing buildings."

Greenspaces, Water Spaces and Biodiversity

The Authority maintains its support for Policies on Green Space GWS1, Water Space GWS2 and Biodiversity Urban Greening and Access to Nature (GWS3) and welcomes the strengthening of policy GWS2 so as to appropriately balance the need to activate water spaces with other considerations such as biodiversity and accessibility. This should help to protect the quality and enjoyment of the Water spaces within the Regional Park in Newham and their associated character, heritage and biodiversity.

Connectivity along Water Spaces

It is noted that the mapping of the opportunities to improve green and water connectivity for each of the Local Plan Neighbourhoods is included in the Green and Water Infrastructure Strategy (2024) which forms part of the evidence base to the Local plan. **The Authority supports Policy BFN1.6 which specifically mentions the need for bridges across the River Lea.** This addresses the Authority's previous comments about the need to have an overarching framework including mapping that identifies the areas where improved connections and bridge links are required, in particular along the River Lea.

Biodiversity

Reference to the Authority's Biodiversity Action Plan 2019 – 2029 should be included as part of the Evidence Base list provided for this section of the Plan. It is noted that the Council intended to include this reference but it is not evident in the list on page 274. Reference has however been made to the Authority's Landscape Strategy which is welcome.

Neighbourhoods

The Authority commented previously on the draft Local Plan Neighbourhood policies, with reference to three neighbourhoods which incorporate parts of the Regional Park within their areas; namely 'Stratford and Maryland', 'Three Mills', and 'Canning Town and Custom House'.

The Authority welcomes the changes that have been made in response to these comments as follows:

N8 Stratford and Maryland page 113

The Authority supports the additional wording added to the Stratford and Maryland Profile which states that **"part of the neighbourhood incorporates substantial areas of the Lee Valley Regional Park including the Lee Valley VeloPark and northern Olympic Parklands."**

The addition to the Vision statement is also supported as this adds a reference to the Regional Park under point 14 as follows:

The vision for Stratford and Maryland will be achieved by

14. protecting and supporting enhancements to playing pitches and sports courts at Chobham Academy and the athletics provision at London Marathon Community Track and **supporting the on-going development and enhancement of the Lee Valley VeloPark on the Queen Elizabeth Olympic Park as a world class cycling venue for track, BMX, road and mountain biking and as a venue for major events;**

N7 Three Mills

The Authority supports the additional wording added to the Three Mills Profile which states **"and part of the neighbourhood, most notably Three Mills Island, is in the Lee Valley Regional Park"**.

The changes to the vision for Three Mills under point 3 as set out in red font below are noted and supported. Whilst the wording added is different to that proposed by the Authority it does reflect the objectives for Three Mills set out within the PDF to see a heritage based visitor hub delivered building on existing visitor attractions and heritage assets.

The Vision for Three Mills will be achieved by

3. supporting the restoration and conservation of heritage buildings at Three Mills to both preserve the character of the area and sensitively update facilities, including the delivery of an appropriately scaled visitor hub, to ensure they are fit for purpose, enhance the existing employment uses and better promote access to, and understanding of, the heritage buildings at Three Mills;

N4 Canning Town

The Authority supports the additional wording added to the Canning Town Profile which states: "The Greenway runs to the north of the neighbourhood and, in the south west, part of the neighbourhood is in the Lee Valley Regional Park."

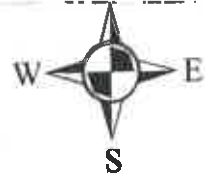
The Regional Park is also now listed in the pro-forma for all the relevant site allocations within the above neighbourhoods as a relevant site designation under the category Natural Environment Designation, to ensure future development within these areas takes account of the Regional Park.

The Authority will submit the above comments as formal representations including the proposed modifications via the downloadable representation form by 20th September.

Yours sincerely

Claire Martin
Head of Planning

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L.B. Waltham Forest

Hackney Marshes

Lee Valley Hockey & Tennis Centre

Lee Valley VeloPark

L.B. Newham

L.B. Tower Hamlets




Three Mills Island

The Greenway

Bow Creek Ecology Park

East India Dock Basin



-  Local Authority Boundary
-  Park Boundary
-  LLDC Area within L.B. Newham

Lee Valley Regional Park within London Borough of Newham



Scale: 1:35,000

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Appendix C to Paper RP/84/24

Table 1. Assessment of Pre-Submission Local Plan

Summary of LVRPA Comment at Reg 18 draft Local Plan stage	Newham response. Proposed changes/new text shown in red font	LVRPA proposed further change - suggested wording in blue bold font. Red text indicates changes already proposed by Newham
<p>1. Policy Support for the Regional Park Authority and Park Development Framework</p> <p>The Authority sought the inclusion of a Lee Valley Regional Park specific policy statement in the Local Plan to cover support for the Authority's remit, the Regional Park and reference the Park Development Framework Area proposals as they apply to the Park area within Newham.</p> <p>This would fulfil the mandatory requirements of the Park Act Section 14 (2) (a) as it relates to the riparian authorities such as Newham. It would provide context for the Regional Park's spatial designation included on the Policies Map.</p>	<p>Newham have proposed changes to policy and justification text to make it clear that there is support for the Lee Valley Regional Park and the Park Development Framework.</p> <p>These changes are covered by new wording added to Policy BFN1.5 and associated justification and implementation text as follows: (all new text in red)</p> <p>BFN1.5: Spatial strategy Development will protect and enhance existing parks and social infrastructure and support the creation of new parks and social infrastructure by requiring the delivery of:</p> <p>h. development that supports the vision of the Lee Valley Regional Park Authority's Development Framework (Area 1); and</p>	<p>Further change needed. Reference to the 'vision' of the PDF is confusing as it is not clear to what this refers. The Area 1 Proposals are not considered to present a vision as such, but represent the 'plan of proposals for the future management and development of the Regional Park' referenced under Section 14 (1) of the Park Act.</p> <p>Revised wording for BFN1.5h is suggested as follows; this is broadly in line with the text discussed by officers from Newham and LVRPA following the Reg 18 consultation:</p> <p>h. development that supports the Lee Valley Regional Park, it's remit and the Park Development Framework Area Proposals (Area 1) as these apply to the Park in Newham.</p>

Summary of LVRPA Comment at Reg 18 draft Local Plan stage	Newham response. Proposed changes/new text shown in red font	LVRPA proposed further change - suggested wording in blue bold font. Red text indicates changes already proposed by Newham
Justification Text	<p>Justification text</p> <p>3.9 The borough's quantity of publicly accessible open space for each person is low, and many areas lack good places for children to play. Despite this overarching deficit, significant areas of the Lee Valley Regional Park lie within the Three Mills, Canning Town and Custom House and Stratford and Maryland neighbourhoods. The strategy therefore seeks to make the most of our existing green assets, including the Lee Valley Regional Park, while reducing our spatial and absolute deficits.</p>	<p>Justification text</p> <p>It is also important that the Justification text refers to the range of open spaces, sport and leisure venues when referencing the Regional Park as these make a significant contribution to recreational opportunities within the local neighbourhoods. An amendment is proposed to the second part of the Justification text as follows:</p> <p>3.9 The borough's quantity of publicly accessible open space for each person is low, and many areas lack good places for children to play. Despite this overarching deficit, significant areas of the Lee Valley Regional Park lie within the Three Mills, Canning Town and Custom House and Stratford and Maryland neighbourhoods. These include the Lee Valley VeloPark and land consisting of the northern Olympic parklands, the open spaces, film studios, natural play and important heritage contained within the Three Mills Island complex, part of the Greenway, and the Bow Creek Ecology Park. The strategy therefore seeks to make the most of our existing green assets, including the Lee Valley Regional Park, while reducing our spatial and absolute deficits.</p>

Summary of LVRPA Comment at Reg 18 draft Local Plan stage	Newham response. Proposed changes/new text shown in red font	LVRPA proposed further change - suggested wording in blue bold font. Red text indicates changes already proposed by Newham
Implementation section	<p>Implementation Section – text added for BFN1.5. Newham will consult the Lee Valley Regional Park Authority (LVRPA) on planning applications which it considers could affect the Park. Under the terms of the Lee Valley Regional Park Act (1966), the LVRPA can refer any decisions by Newham 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.</p> <p>Evidence Base includes as part of the list: The Lee Valley Regional Park Development Framework, The Lee Valley Regional Park Authority (2010)</p>	<p>Implementation section An addition to the Implementation text is also proposed, this is considered helpful in setting a context for the planning consultee position that Newham have already included. New text in blue bold font as follows:</p> <p>Created by the Lee Valley Regional Park Act in 1966, the Park Act), the Lee Valley Regional Park Authority (LVRPA) is a key stakeholder in the Borough. 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. Within Newham the Regional Park makes a significant contribution to the Borough's green infrastructure resource and its leisure and cultural amenity offering residents and visitors a combination of nationally and internationally important sporting venues, ecologically rich open spaces and local opportunities for recreation and healthy activity.</p> <p>Newham will consult the Lee Valley Regional Park Authority (LVRPA) on planning applications which it considers could affect the Park. Under the terms of the Lee Valley</p>

Summary of LVRPA Comment at Reg 18 draft Local Plan stage	Newham response. Proposed changes/new text shown in red font	LVRPA proposed further change - suggested wording in blue bold font. Red text indicates changes already proposed by Newham
		<p>Regional Park Act (1966), the LVRPA can refer any decisions by Newham 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.</p> <p>The contents of the Lee Valley Park Development Framework, as adopted, is a material consideration in the determination of planning applications.</p>
<p>2. The Regional Park boundary should be identified as a statutory designation on the Key Diagram</p>	<p>No change proposed. Newham's response states: <i>"This change has not been made. The Regional Park boundary is identified as a statutory designation on the Policies Map. The key diagram is meant to illustrate the spatial strategy and indicate where growth and change will occur."</i></p>	<p>The Authority supports the inclusion of the Regional Park boundary as a statutory designation on the Policies Map and with policy support for the Regional Park included under Policy BFN1 accepts the Council's position that it does not need to be included on the Key Diagram</p>
<p>3. The Authority highlighted Policy BFN4 'Developer contributions and infrastructure delivery' and commented that it would be important to secure additional investment for the Regional Park via planning obligations (CIL/S106) from those developments likely to impact the Park, particularly</p>	<p>Newham have noted the points raised regarding BFN4 stating that any financial contributions would be considered at application stage and on an application specific basis and would have to demonstrate a significant impact on the Regional Park.</p>	<p>No further change or comment.</p>

Summary of LVRPA Comment at Reg 18 draft Local Plan stage	Newham response. Proposed changes/new text shown in red font	LVRPA proposed further change - suggested wording in blue bold font. Red text indicates changes already proposed by Newham
<p>where these developments place additional pressure on its open and waterside spaces, biodiversity and heritage sites.</p>		
<p>4. Policy D4 Tall Buildings The policy on tall buildings set out under Policy D4 was noted and the range of implementation assessment stages welcomed.</p>	<p>Newham have noted this point.</p>	<p>No further change</p>
<p>Policy D4 Tall Buildings with reference to Site Allocations. The Authority made a number of comments relating to the guidance for tall buildings included within the site allocation section of the Local Plan as set out below</p> <p>Concerns raised were as follows: For N7.SA1 Abbey Mills the overall design and placement of buildings will have to be sensitively planned given the need to retain views of the Abbey Mills Pumping Station Grade II* and the wider heritage features of the area specifically those on Three Mills Island.</p>	<p>Newham have amended the policy approach and have stated "A reference to the importance of conserving and enhancing the significance of heritage assets and the reference to the relevant Character Appraisal and Management Plans have been included. The wording of relevant site allocation design principles have been changed to clarify how development proposals of tall buildings in proximity to sensitive areas should respond to the historic environment and manage the transition between 'conserve' and 'transform' areas." New wording has been added to Table 1: Tall Building Zones, implementation text D4.3 and relevant site allocations, including N7.SA1 Abbey Mills.</p>	<p>The Authority notes the changes made and supports the new wording in Table 1 Tall Building Zones and within the site allocation guidance as follows (shown in red text):</p> <p>TBZ16 Abbey Mills</p> <ul style="list-style-type: none"> • Height, scale and massing of development proposals should be assessed to conserve and enhance the character of heritage assets without detracting from important landmarks and key views, including the Abbey Mills Pumping Station. • Careful consideration is required for the location of tall buildings, particularly along the waterways to avoid overshadowing impact on watercourses.

Summary of LVRPA Comment at Reg 18 draft Local Plan stage	Newham response. Proposed changes/new text shown in red font	LVRPA proposed further change - suggested wording in blue bold font. Red text indicates changes already proposed by Newham
		<p>New guidance set out in N7.SA1 is also supported as follows:</p> <p>Development should conserve and enhance the Three Mills Conservation Area and the listed buildings in proximity of the site and their settings. Height, scale and massing should conserve and enhance the character of heritage assets without detracting from important landmarks and key views, including the Grade II Abbey Mills Pumping Station, the Grade II Clock Mill and the Grade I House Mill as set out in the Three Mills Conservation Area Appraisal and Management Guidelines.</p>
<p>For N7.SA2 Twelvvetrees Park and Former Bromley By Bow Gasworks the Authority requested that the guidance specify a set back from the riverside edge on the western side of the site, which is opposite a linear extension to the Regional Park along the River Lee Navigation towpath, and that building heights should not block or interrupt views through the site to the Clock House Grade II and House Mill Grade 1 listed.</p>	<p>Newham have responded that "This policy approach has now changed to ensure the impact of tall buildings on watercourse and open spaces are considered in line with policies GWS2 Water Space and GWS3 Biodiversity, Urban Greening and Access to Nature, which are requiring development proposals for tall buildings to demonstrate consideration of the impact on biodiversity, existing and proposed public open space, including watercourses. Furthermore, a reference to the importance of conserving and enhancing the significance of heritage assets and the reference to the relevant Character Appraisal and Management Plans have been included. The wording of Policy D4 and relevant site allocation design principles has been changed. Please</p>	<p>New wording proposed under TBZ15 West Ham Station below (red text) is supported</p> <ul style="list-style-type: none"> • Height, scale and massing of development proposals should be assessed to conserve and enhance the character of heritage assets without detracting from important landmarks and key views set in the Three Mills conservation area appraisal and management guidelines. • Careful consideration is required for the location of tall buildings, particularly along the waterways to

<p>Summary of LVRPA Comment at Reg 18 draft Local Plan stage</p>	<p>Newham response. Proposed changes/new text shown in red font</p>	<p>LVRPA proposed further change - suggested wording in blue bold font. Red text indicates changes already proposed by Newham</p>
	<p>see the new wording in TBZ15: West Ham Station, implementation text D4.3 and N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks site allocation.</p>	<p>avoid overshadowing impact on watercourses</p> <p>New guidance set out in N7.SA2 is also supported as follows: Development should conserve and enhance the Three Mills Conservation Area, the listed Gasholders and the listed buildings in the proximity of the site and their settings. Height, scale and massing should conserve and enhance the character of heritage assets without detracting from important landmarks and key views, including the Grade II Abbey Mills Pumping Station, the Grade II Clock Mill and Grade I House Mill as set out in the adopted Three Mills and Conservation Area Appraisal Management Guidelines</p>
<p>At the Limmo site (N4.SA4) and Canning Town Riverside (N4.SA5). Although both of these sites are located further away from the Park boundary it is important to ensure the cumulative impact of tall buildings are taken into consideration in terms of the Regional Park at Bow Creek Ecology Park and also at East India Dock Basin</p>	<p>Newham have changed the policy approach for these sites to ensure policy implementation takes into account the impact of tall buildings on watercourse and open space in line with policies GWS2 and GWS3 as mentioned above. They state: <i>“Implementation text D4.3 is clear that development proposals for tall buildings are required to address the criteria set by London Plan (2021) Policy D9 section C, including visual, environmental and cumulative impact and to demonstrate this in a tall building section of the Design Access Statement. The wording of Policy D4 and</i></p>	<p>The Authority supports the new wording (red text below) in Table 1 Tall Building Zones as this addresses the issue of cumulative impact.</p> <ul style="list-style-type: none"> • New bullet for Canning Town TBZ13 Development including tall buildings in this zone should assess their visual and townscape impact in the context of existing and permitted tall buildings to

<p>Summary of LVRPA Comment at Reg 18 draft Local Plan stage</p> <p>which sits just over the boundary in Tower Hamlets</p>	<p>Newham response. Proposed changes/new text shown in red font</p> <p><i>relevant site allocation design principles have been changed. New wording is included in N4.SA4 Limmo site allocation and N4.SA5 Canning Town Riverside site allocation</i></p>	<p>LVRPA proposed further change - suggested wording in blue bold font. Red text indicates changes already proposed by Newham</p> <p>ensure the cumulative impact does not saturate the skyline.</p>
<p>5. Heritage and Conservation Areas The Authority supported policy on protecting Conservation Areas and their heritage assets, in particular the importance of protecting views to key landmarks such as the Grade 1 listed House Mill and the landscape within which these areas are set.</p> <p>A minor addition to Policy D8 (now D7) 'Conservation Areas and Areas of Townscape Value' bullet point 3 was therefore proposed to ensure it included as a characteristic of Conservation Areas "the value of promoting the important industrial archaeology associated with the waterways along the Leaway south of Three Mills".</p>	<p>Newham did not consider this change to be necessary as the waterways referred to are already within Newham's Archaeological Priority Area designations and will be considered as part of policy D8 (formerly D9)</p>	<p>Noted and no further comment</p>
<p>6. Leisure, Culture and Sporting Venues The Authority sought the inclusion of a policy that supports the growth and diversification of major sporting</p>	<p>Note this Policy was previously under Community Facilities and is now under Social Infrastructure (SI). Newham have responded by making a wording change to Policy SI3 Justification text to clarify policy intent</p>	<p>The change to Justification text is supported. This brings Newham's plan in line with the</p>

Summary of LVRPA Comment at Reg 18 draft Local Plan stage	Newham response. Proposed changes/new text shown in red font	LVRPA proposed further change - suggested wording in blue bold font. Red text indicates changes already proposed by Newham
<p>venues and visitor attractions such as the Lee Valley VeloPark and the role they can play in growing the visitor economy. In particular policy that supports the evolution of the VeloPark to meet changes in cycle sports and competition events in the coming years and to enable the Authority to improve and grow the sporting offer both as an international/national leisure and sporting venue and as a sporting venue for the local community should be incorporated into the Plan.</p> <p>Reference was made to the supporting statement contained within the LLDC Local Plan which supports the Lee Valley Velopark and the work of the Authority as it seeks to improve and grow the offer associated with the venue and thereby ensure its long term sustainability</p>	<p>and to add Newham Specific detail on the Queen Elizabeth Olympic Park, associated leisure facilities and the reference is made to the Lee Valley Regional Park Authority.</p> <p>Justification text</p> <p>3.139 Newham is home to the Queen Elizabeth Olympic Park, the London Stadium, Aquatic Centre and the Lee Valley Velopark, all of which are a lasting legacy from the 2012 Olympic Games. These are world class facilities and important national leisure and sporting venues. The Lee Valley Velopark is owned by the Lee Valley Regional Park Authority and is managed through its leisure trust. Newham continues to work closely with and support the Park Authority as it seeks to improve and grow the offer, thereby ensuring its long term sustainability.</p> <p>There has been no change to policy however. Newham have stated that they do not consider a change to the policy necessary "as the growth and diversification of the Lee Valley Velo Park and Three Mills Island would be addressed through Local Plan policies S11, S12 and S13. New or cultural and leisure facilities would be supported, where they are in line with Policy S12. Policy S13, in particular, is intended to protect and support the growth and diversification of cultural and leisure facilities."</p>	<p>support provided by the LLDC Local Plan. One small amendment is needed however to refer to 'a' leisure trust rather than its leisure trust – so it reads</p> <p>The Lee Valley Velopark is owned by the Lee Valley Regional Park Authority and is managed through a leisure trust.</p> <p>The new policy reference to the Regional Park and PDF under Policy BFN1.5 also refers to and supports the development of new social infrastructure by requiring the</p>

Summary of LVRPA Comment at Reg 18 draft Local Plan stage	Newham response. Proposed changes/new text shown in red font	LVRPA proposed further change - suggested wording in blue bold font. Red text indicates changes already proposed by Newham
<p>7. Green Spaces and Water Space</p> <p>The Authority supported the comprehensive policy for green and water spaces (GWS1 and 2). These policies sought to protect and enhance the varied and multiple functions provided by green and water spaces and maximise opportunities to improve their quality, accessibility and connectivity.</p> <p>There was concern raised however about clarifying the priorities for blue (or water) space which seems to face increasing pressure due to the location of high density development and the many uses associated with the water space as well as its biodiversity value.</p>	<p>Newham noted the Authority's support.</p> <p>In terms of the pressure faced by water space as a result of adjoining development Newham have commented that "this policy approach has now changed due to the need to strengthen its intention, which is to appropriately balance the need to activate water spaces with other considerations. New wording is now included in Policy GWS2."</p>	<p>No further changes</p> <p>The Authority supports the additional elements added to strengthened policy for Green and Water Spaces (GWS1 and 2) in particular Policy GWS2.2 which states that:</p> <p>2. Development affecting and/or adjacent to water space should improve the existing water space network, including navigation, biodiversity (including riparian trees and wet woodland), water quality, visual amenity, character, and heritage value. This will be achieved through:</p> <ul style="list-style-type: none"> a. requiring major development adjacent to, and all development affecting water space, to demonstrate an integrated approach to water infrastructure in a Design and Access Statement e. maximising biodiversity, delivering a minimum 10 percent Biodiversity Net Gain <p>and under Policy GWS2 3b</p> <p>3. Applications for water-related or water-dependent facilities on or adjacent to water spaces will be supported where:</p> <ul style="list-style-type: none"> b. it can be demonstrated that the activation of the water space is

<p>Summary of LVRPA Comment at Reg 18 draft Local Plan stage</p>	<p>Newham response. Proposed changes/new text shown in red font</p>	<p>LVRPA proposed further change - suggested wording in blue bold font. Red text indicates changes already proposed by Newham</p>
		<p>appropriately scaled and located and does not negatively impact on navigation, ecological value, water quality, the openness and character of the water space and the amenity of surrounding residents.</p>
<p>The Authority noted the work being undertaken on Newham's Green and Water Infrastructure Strategy (which has now been finalised (July 2024) and an opportunity to engage with this work was requested.</p>	<p>In response to the Authority's comments Newham have explained that the "G&W Strategy takes a high level view of the green and water spaces in Newham, their quantity, distribution, quality and the impact future population growth. The Strategy has enabled LBN to update their knowledge of the amount and the quality of green and water space in both Newham and the area currently covered by the LLDC. It has not delved into the individual functions of existing park spaces. In future, the Parks Team at Newham may wish to develop a Parks Strategy, but this sits beyond the scope of this work. The Strategy will include an Action Plan; this will set out how the principles of the Strategy should be delivered."</p>	<p>Noted. Unfortunately there was limited opportunity to engage due to the timescales for this work.</p>
<p>8. Metropolitan Open Land (MOL) The Authority also noted that a review of Metropolitan Open Land site designations, was underway as part of the Local Plan process. Engagement with this process was also sought. Newham's Green Belt and Metropolitan Open Land Review</p>	<p>Newham have commented that a desktop review of Newham's MOL/Green Belt was been undertaken to ensure that the existing designations reflected the NPPF, London Plan policy and Newham's strategic requirements for green infrastructure. The 'Newham MOL and Green Belt Review (2024)' Appendix A MOL</p>	<p>The Authority supports the removal of the MOL designation from the Velodrome. The MOL designation is however retained across the remainder of the VeloPark and the Policies Map now includes an additional designation for the outdoor cycling tracks,</p>

<p>Summary of LVRPA Comment at Reg 18 draft Local Plan stage</p>	<p>Newham response. Proposed changes/new text shown in red font</p>	<p>LVRPA proposed further change - suggested wording in blue bold font. Red text indicates changes already proposed by Newham</p>
<p>(2024) has been published for consultation alongside the Submission Draft Local Plan</p>	<p>Site Assessments has considered the Olympic Park area (MOL Area 32). It states:</p> <p><i>“built development is largely absent from the parcel, with the iconic and structural buildings in the Queen Elizabeth II Olympic Park (QEOP) sitting outside of the MOL designation. Whilst the sense of openness is well-defined there is localised erosion by the Lee Valley Velo Park building in the north of the parcel. It is proposed to remove the Lee Valley Velo Park building to the north of the parcel from the MOL parcel. This would take a consistent approach with the London Stadium, which does not form part of the adopted MOL parcel. The proposed re-organisation of the MOL will form a more coherent parcel of MOL while protecting the core function of the site as a key structural feature in both the Queen Elizabeth II Olympic Park and the Lee Valley Regional Park.”</i></p> <p>The MOL designation is retained across the remainder of the VeloPark and the Policies Map now includes an additional designation for the outdoor cycling tracks, showing these as Sports Facilities in Green Space.</p>	<p>showing these as Sports Facilities in Green Space.</p> <p>Policy GWS1 Green Spaces applies and this seeks to protect existing green space to ensure no net loss and states that:</p> <ol style="list-style-type: none"> 1. Development should provide or help to deliver easy access to a network of high-quality green spaces. This will be achieved through: <ul style="list-style-type: none"> b. maintaining the open character of Metropolitan Open Land and Green Belt in accordance with the London Plan (2021) and national Green Belt policy; and... <p>Implementation text (red text below) associated with GWS1b is helpful</p> <p><i>“Within areas of Metropolitan Open Land and Green Belt, development that is more likely to either be capable of maintaining its openness or exceptionally, meet the very special circumstances test, is development which would enhance the quality and function of the MOL or Green Belt. For example, this could be providing new or enhanced outdoor recreation facilities or enabling alteration or replacement of existing buildings.”</i></p>

Summary of LVRPA Comment at Reg 18 draft Local Plan stage	Newham response. Proposed changes/new text shown in red font	LVRPA proposed further change - suggested wording in blue bold font. Red text indicates changes already proposed by Newham
<p>9. Connectivity along water spaces</p> <p>The Authority supported policy that will deliver waterside routes, for example along the River Lea and River Thames, and associated bridge connections. It was noted that Partnership working between the London Boroughs of Newham and Tower Hamlets together with other key stakeholders on the Lea River Park and The Leaway was well advanced. It was considered appropriate that this should be reflected in the Local Plan with the inclusion of an overarching framework including mapping, to identify the areas where improved connections including bridge links are needed in particular along the River Lea. It is important that opportunities for development to assist in delivering these connections is identified within the vision and infrastructure requirements set out for the Neighbourhoods.</p>	<p>Newham commented that they did not consider this change to be necessary "as the Green and Water Infrastructure Strategy (2024) includes mapping of the opportunities to improve green and water connectivity for each of the Local Plan Neighbourhoods. Policy BFN1.6 also specifically mentions the need for bridges across the Lea and crossings over the Lea are already indicatively reflected spatially in the Key Diagram. In addition, the Neighbourhoods chapter includes details on improvements to access to and quality of the River Lea edge and specifically mentions bridges in two Neighbourhoods (N6. Manor Road and N8. Stratford and Maryland). There is mapping to support this on at N8. but not at N.6, since the Manor Road neighbourhood has no site allocations."</p>	<p>These points are noted and welcomed. The Authority supports Policy BFN1.6 which references the need for bridges across the River Lea as follows:</p> <p>6. Development must contribute to improving strategic and local connections and increasing active travel through improved local walking and cycling connections; the implementation of Low Traffic Neighbourhoods; new bridges over the River Lea, docks and other barriers; the extension of the Leaway Walk, Thames Path and Capital Ring; and by reducing the dominance of the borough's road infrastructure to improve air quality and to enable better walking and cycling.</p>
<p>10. Biodiversity</p> <p>The detailed policy provisions for biodiversity, access to nature and</p>	<p>Newham noted this support</p>	<p>The change as per the wording suggested by the Authority is noted and welcomed</p>

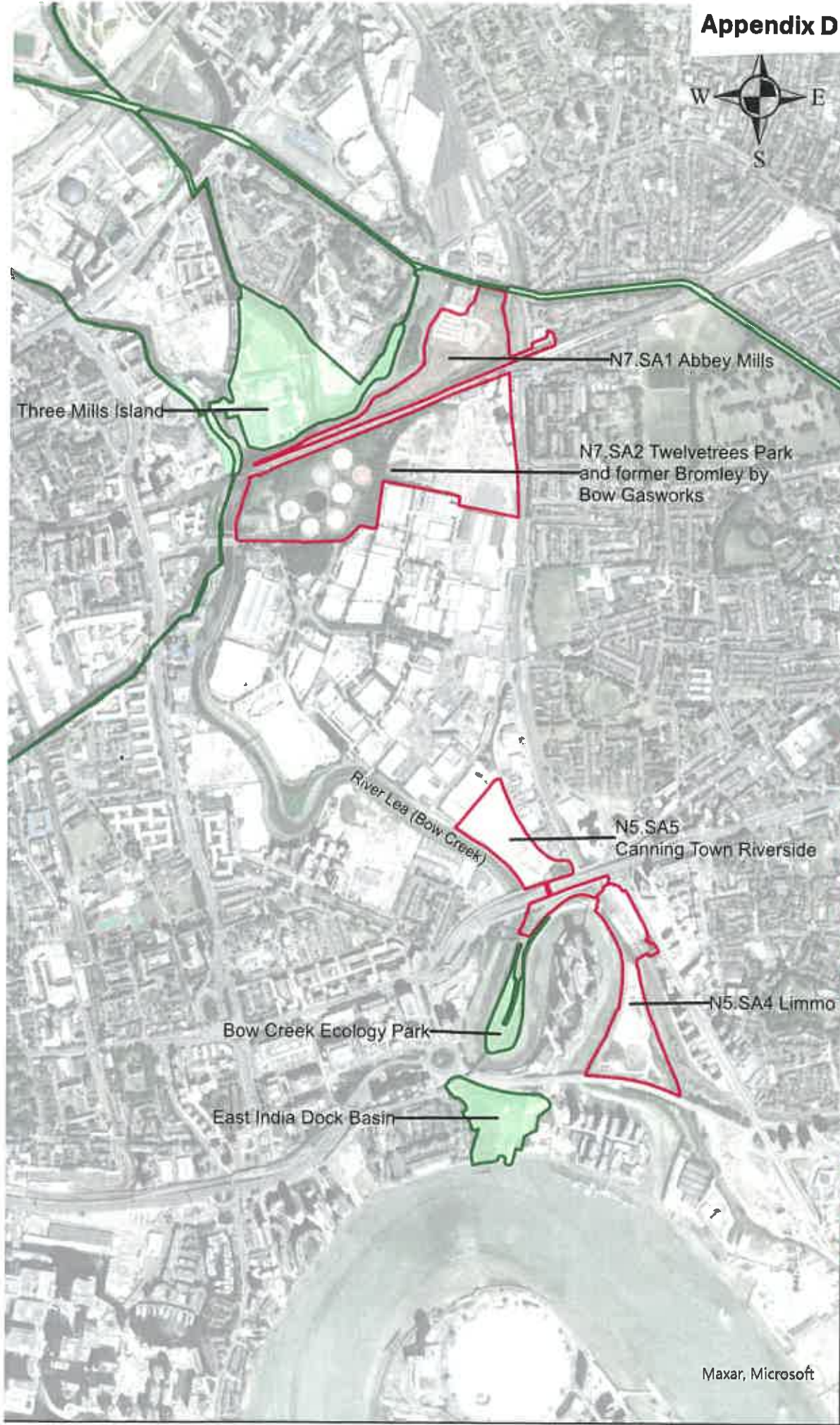
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<p>urban greening set out under policy GWS3 were supported.</p> <p>Ensuring adequate funding is allocated for new areas of biodiversity will be an important part of the development. The Authority suggested that the sentence is amended to read <i>how existing and new areas of biodiversity value will be funded and maintained.</i></p>	<p>This policy approach has now changed due to the need to ensure it make reference to funding, as suggested with new wording in Policy GWS3.</p>	
<p>Policy GWS3 bullet 2, references the impacts of major developments on SINCS and priority or protected species and the need to submit an ecology statement. Potential impacts on the wider Lee Valley SPA should also be considered particularly in terms of the relationship between development and potential impacts to the migratory route through the Lee Valley.</p>	<p>A change to this policy approach has not been made. Newham did not consider this change to be necessary as Policy GWS3 provides sufficient protection to the ecological value and interconnectivity of the Lee Valley Park.</p>	<p>Noted</p>
<p>It was not clear if reference has been made to the Authority's Biodiversity Action Plan 2019 – 2029 in respect of this section of the Plan or in relation to the work underway as part of the interim Green and Water Spaces Strategy. A request also made to</p>	<p>Newham have responded stating that the wording change has been made and added in the evidence base section for Policy GWS3.</p>	<p>Noted but the wording change does not seem to have been made and will need to be added. Reference has been included however to the Authority's Landscape Character Assessment and Landscape Strategy.</p>

Summary of LVRPA Comment at Reg 18 draft Local Plan stage	Newham response. Proposed changes/new text shown in red font	LVRPA proposed further change - suggested wording in blue bold font. Red text indicates changes already proposed by Newham
involve the Authority with the detail of this work as it considers the biodiversity baseline and opportunities to reduce areas of deficiency in Newham.		
11. Transport The Authority supported the policy on transport in the draft Local Plan and the inter-relationship with policy on the design of development and public realm provision	Comment noted, the Sustainable Transport Strategy sets out strategic transport improvements across the borough.	Noted
With the transition of planning powers from the LLDC back to Newham Council the Authority also emphasised the importance of ensuring policy in the Local Plan assists in the safeguarding of routes for spectator access as designated safe pedestrian routes, between public transport hubs and major venues or event spaces such as the Lee Valley VeloPark. As previously stated major development and the associated closure of roads during construction can disrupt key pedestrian routes (such as the Last Mile from Stratford through to the VeloPark).	The Local Plan addresses this topic through the transport policies. However, it cannot deliver the change you have requested, as we do not control the public highway. Our colleagues in the Sustainable Transport and Highways department are able to help regarding this. We have also provided them with your comments.	Noted

Summary of LVRPA Comment at Reg 18 draft Local Plan stage	Newham response. Proposed changes/new text shown in red font	LVRPA proposed further change - suggested wording in blue bold font. Red text indicates changes already proposed by Newham
<p>12. Neighbourhoods The Authority noted the new section within the draft Local Plan focused on the Neighbourhoods three of which include the Regional Park within their area. Additional references to the Regional Park were sought for each as follows:</p>	<p>Newham have changed the policy approach to include reference to the Regional Park in the neighbourhood profile for N8 Stratford and Maryland as follows: and part of the neighbourhood incorporates substantial areas of the Lee Valley Regional Park including the Lee Valley VeloPark and northern Olympic Parklands.</p>	<p>Noted, additional wording supported.</p>
<p>N8 Stratford and Maryland - The following addition was proposed for the Stratford and Maryland neighbourhood vision policy section: "Support the ongoing development and enhancement of the Lee Valley VeloPark on the QEOP as a world class cycling venue for track, BMX, road and mountain biking and as a venue for major events".</p>	<p>The wording change to the vision section for N8 Stratford and Maryland has been made, new wording as follows: The vision for Stratford and Maryland will be achieved by: 14. protecting and supporting enhancements to playing pitches and sports courts at Chobham Academy and the athletics provision at London Marathon Community Track and supporting the on-going development and enhancement of the Lee Valley VeloPark on the Queen Elizabeth Olympic Park as a world class cycling venue for track, BMX, road and mountain biking and as a venue for major events:</p>	
<p>N7 Three Mills The Authority sought the inclusion of an additional bullet point as part of the Three Mills Neighbourhood vision statement: as follows to reflect the Authority's objectives for Three Mills</p>	<p>Newham have changed the policy approach to include reference to the Regional Park in the neighbourhood profile with the following wording added: "and part of the neighbourhood, most notably Three Mills Island, is in the Lee Valley Regional Park".</p>	<p>Noted and supported</p>

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<p>Island as set out in the PDF Area 8 Proposals:</p> <p>“Support the delivery of a visitor hub at Three Mills Island as part of the Lee Valley Regional Park, with historical features of special interest within the landscape and associated with the waterways to be conserved and interpreted and views to key landmarks within and outside the Regional Park protected. In particular protect the heritage interest and value of built structures such as the Grade I House Mill, the Grade II listed Clock Mill and the waterside spaces within the Three Mills and the adjacent Sugar House Lane Conservation Areas. Protect views to the House Mill and Clock House and to the Abbey Mills Pumping Station (Grade II listed) on Mill Meads”.</p>	<p>The additional wording proposed for the vision statement has not been made. Newham did not consider this change to be necessary due to the potential duplication of clauses relating to conserving the neighbourhood's heritage assets. However, the policy wording has been amended to support the delivery of a visitor hub and to better promote access and understanding of the heritage buildings.</p> <p>Change made</p> <p>3. supporting the restoration and conservation of heritage buildings at Three Mills to both preserve the character of the area and sensitively update facilities, including the delivery of an appropriately scaled visitor hub, to ensure they are fit for purpose, enhance the existing employment uses and better promote access to, and understanding of, the heritage buildings at Three Mills;</p>	<p>Noted, the change made is supported.</p>
<p>Canning Town The vision section for N4 should include a reference to the Regional Park.</p>	<p>This policy approach has now changed to include reference to the Regional Park in the neighbourhood profile. Please see the new wording in the neighbourhood profile for N4. “The Greenway runs to the north of the neighbourhood and, in the south west, part of the neighbourhood is in the Lee Valley Regional Park.”</p>	<p>Noted and supported</p>

Summary of LVRPA Comment at Reg 18 draft Local Plan stage	Newham response. Proposed changes/new text shown in red font	LVRPA proposed further change - suggested wording in blue bold font. Red text indicates changes already proposed by Newham
<p>For all the above site allocations the Regional Park should be listed in the pro-forma as a relevant site designation with reference to the PDF to ensure future development can take into account the provisions of the PDF.</p>	<p>This policy approach has now changed to include reference to the Regional Park in the site profiles under the category 'Natural Environment Designation'.</p>	<p>The reference to the Regional Park within the site profiles identified below is supported N4.SA4 Limmo N4.SA5 Canning Town Riverside N7.SA1 Abbey Mills N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks N7.SA3 Sugar House Island</p>



- Site Allocations
- Park Boundary



**LONDON BOROUGH OF WALTHAM FOREST LOCAL PLAN
PART 2 SITE ALLOCATIONS PROPOSED SUBMISSION
VERSION CONSULTATION**

Presented by the Head of Planning.

SUMMARY

The London Borough of Waltham Forest are consulting on their Proposed Submission version Local Plan Part 2 (Site Allocations). The Local Plan Part 1 Strategic Policies was adopted on 29 February 2024.

The Authority's draft representations on the Part 2 Site Allocations are set out in the letter attached as Appendix A to this report. These take account of the changes made in response to the matters raised during previous rounds of consultation. They also respond to two new matters raised by the Council requiring changes to the Local Plan Policy Map, namely changes to the locations identified as suitable for tall buildings and changes to the classification of industrial locations.

The representations that have been made are largely supportive but also pick up some further minor amendments where appropriate in respect of eleven site allocations within and adjacent to the Regional Park at Leyton, Lea Bridge Road, Low Hall and at sites on Sewardstone and Lea Valley Road.

A leisure based site allocation for both the Ice Centre and the WaterWorks Centre and car park as previously sought by the Authority has not been included in the current proposed submission version document. It is understood from discussions with officers at London Borough of Waltham Forest that the Site Allocations are exclusively focused on meeting housing and employment needs and that sites wholly within the Green Belt and Metropolitan Open Land (MOL) have not been included. There is however a commitment from the London Borough of Waltham Forest (LBWF) to work collaboratively with the Authority on realising the leisure and sporting potential of key sites/venues within the Borough, principally through a master planning and Development Performance process. This will be covered in a Statement of Common Ground as part of the Local Plan Part 2 examination process. It should also be noted that since the Authority previously commented on the Site Allocations, the Local Plan Part 1 has been adopted and this includes a number of policies that offer support for the Regional Park, the remit of the Authority and specifically support

opportunities to grow the visitor and sporting offer of the Lee Valley Regional Park and its venues; including the Lee Valley Ice Centre, the Lee Valley WaterWorks Centre and the Lee Valley Hockey and Tennis Centre, (Policy 9).

Further discussions will be held with the London Borough of Waltham Forest regarding the Statement of Common Ground and the collaborative planning process for sites within the Regional Park. Formal representations will also be submitted taking forward the comments set out in the letter at Appendix A to this report for consideration at the Local Plan Part 2 examination in due course.

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 Proposed Submission version Local Plan Part 2 Site Allocations.

BACKGROUND

- 1 The Waltham Forest Local Plan is formed of two parts which together set out the Council's spatial and planning policy framework to promote, shape and manage sustainable, inclusive growth in the borough until 2035. The Local Plan Part 1 was adopted in February 2024. It sets out the vision and strategic objectives to achieve inclusive growth and the spatial approach to development across the southern, central and northern parts of the borough and has established a need for 27,000 new homes and 52,000sqm of new employment space. Local Plan Part 1 includes the strategic and development management policies that will be used to assess all planning applications and used to deliver development across the borough.
- 2 Local Plan Part 2 (Site Allocations) complements Local Plan Part 1. It allocates specific sites to provide new housing, jobs and social infrastructure, and sets out guidance for their development. The sites identified are those that the Council expects be developed over the Plan Period and for which the provision of further guidance is considered important to achieve inclusive growth. Both parts of the Local Plan will be used to inform decisions on planning applications. This is important because Local Plan Part 1 includes a number of policies that offer support for the Regional Park and the remit of the Authority. In particular:
 - Policy 82 'Lee Valley Regional Park'. This provides support for the Authority's Park Development Framework and Area Proposals as they apply to the Park within Waltham Forest and seeks to ensure development affecting the Regional Park does not contribute to adverse impacts on amenity, ecological integrity or visitor enjoyment.
 - Policy 9 South Waltham Forest (a priority area for regeneration and growth) also offers support for proposals which "Create opportunities to improve and grow the visitor, sporting and wider cultural offer of the Lee Valley Regional Park and its venues; including the Lee Valley Ice Centre, the Lee Valley WaterWorks Centre and the Lee Valley Hockey and Tennis Centre, thereby ensuring their long-term sustainability and contribution to the visitor economy of the borough."
- 3 Sites included in the Part 2 Local Plan have been through a selection process

that accords with national planning policy, the London Plan, the Council's Call for Sites exercises (2017- 2019), and the findings of the Growth Capacity Study 2018. The Council's Industrial Land Audit (2021) as well as site or area specific industrial masterplans have informed the process in relation to the suitability of the borough's industrial land for various uses and the scope for industrial intensification, co-location, substitution. The representations received through the earlier rounds of consultation have also informed the current site allocations. Finally, the Local Plan Part 2 has also been updated to align with additional evidence that came forward during the examination of the Local Plan Part 1, which concluded in January 2024.

- 4 Local Plan Part 2 makes provision for 103 site allocations to meet housing and employment needs in the Borough. These are defined as 'Strategic' or 'Key/Non-Strategic' to realising the Council's priorities. A Strategic Site is defined as those capable of either delivering 100 or more new homes, delivering new employment space and/or is found in a Strategic Location. Key sites or 'Non-Strategic' sites are those that would deliver 99 or less new homes and are outside Strategic Locations, but remain important to the delivery of the vision for inclusive growth in a specific area, including bringing stalled sites forward.
- 5 Each site allocation sets out information about the site and relevant planning policy designations, including a site boundary and constraints plan, an indicative development capacity according to the type of use/s proposed, and potential delivery timescale. Site Requirements and a Placemaking Plan set out spatially specific aspects that must be taken into account in any proposals; for example requirements for and location of access provision, connectivity improvements, public realm, active frontages, and areas of change.
- 6 The Authority responded in detail to the earlier rounds of consultation on the draft Local Plan Part 2 most recently to a previous draft Regulation 19 version of the Local Plan Part 2 Site Allocations dated November 2021, (Paper RP/57/21). In its response the Authority sought a leisure based allocation for the Ice Centre and WaterWorks Centre and car park in order to protect the long term future of these areas. Both these areas are within Metropolitan Open Land (MOL) and the Council's position as presented at that time in their Growth Strategy, made clear that sites within MOL and Green Belt (GB) were excluded from consideration for allocation.
- 7 A number of other detailed points concerning allocations both within and adjacent to the Park were also raised including the need to recognise the Regional Park as a 'planning designation' where sites sit either wholly or partially within the Park, a requirement for a stronger emphasis to be placed on the provision of green space and ecological enhancements and the need to identify pedestrian and cycle connections rather than leaving these as matters to 'be explored'.

LOCAL PLAN PART 2 SITE ALLOCATIONS PROPOSED SUBMISSION VERSION 2024

- 8 Comments are now sought on the updated site allocations contained within the Proposed Submission Version of Local Plan Part 2. After the consultation period, the Council intend to submit the Part 2 Site Allocations to the Secretary of State in the autumn/winter 2024 for independent examination in 2025. Adoption is anticipated later in 2025. Representations made to this version must consider whether the LP2 Site Allocations document is 'sound'; that it has

been 'positively prepared', and is 'justified' and 'effective' and consistent with national policy. All representations received will be submitted to the Secretary of State for consideration at the examination.

- 9 The following paragraphs focus on the extent to which the Authority's previous comments have been taken on board in the Proposed Submission version of LP2 and identify a couple of new matters of relevance. The letter at Appendix A to this report sets out the Authority's draft formal response and representations.
- 10 **New Matters - Policy Map Changes**
Preparation of the Local Plan Part 2 has resulted in further proposed changes to the policy designations in Part 1 which also require amendments to the Policy Map. These relate to locations suitable for tall buildings and changes to the classification of industrial locations. These changes carry over into the Site Allocations and where relevant have been responded to in the Authority's representations at Appendix A to this report.
- 11 **Updated Locations Suitable for Tall Buildings**
The locations for tall buildings identified in the Local Plan Part 1 have been informed by a Skyline Study. This has been updated in support of Local Plan Part 2. It tests an illustrative development scenario on each site to consider site allocations where tall buildings as defined by Policy 54 'Tall Buildings' could be appropriate. This process takes account of local character, proximity to public transport accessibility, walking and cycling networks and nearby facilities. As a result twelve amendments have been made to the 'locations suitable for tall buildings' designation with locations within the Park both added and removed. These changes are then carried forward into the Site Allocations. Relevant site allocations include:
- Low Hall Depot Industrial Area and adjacent sites - whole site removed.
 - Rigg Approach Industrial Area – part of site added adjacent to Lea Bridge Road.
 - Lammas Road Industrial Area – part of site added adjacent to Lea Bridge Road.
- 12 **Changes to Strategic and Locally Significant Industrial Locations**
Updated evidence on industrial locations is also relevant to site allocations within and adjacent to the Park. It has resulted in the following proposed changes (which are subject to the agreement of the Greater London Authority (GLA)) to the 'Strategic Industrial Location (SIL)' and 'Locally Significant Industrial Sites (LSIS)' policy designations which ensures an overall net gain of approximately 1.58 ha of land designated as a Strategic Industrial Location (SIL) in Waltham Forest.
- The southern part of the Rigg Approach Strategic Industrial Location (SIL6) is to be redesignated as a Locally Significant Industrial Site (LSIS).
 - The northern part of the Lammas Road Strategic Industrial Location (SIL7) is to be redesignated as a Locally Significant Industrial Site (LSIS).
 - Re-designation of the Low Hall Depot Industrial Area as a Strategic Industrial Location and designation of an enlarged Argall Avenue Strategic Industrial Location.

CHANGES TO LOCAL PLAN PART 2 SITE ALLOCATIONS IN RELATION TO THE ISSUES PREVIOUSLY RAISED BY THE AUTHORITY AND NEW MATTERS

13 Lee Valley Ice Centre and the Waterworks Centre and Car Park

The proposed Submission version Local Plan Part 2 does not include leisure based site allocations for the Ice Centre site or the WaterWorks Centre and car park as previously sought by the Authority. In discussions with officers from LBWF it has been clarified that the focus for LP2 is to provide housing and employment allocations to meet the Council's targets, identifying the most efficient use of land on existing sites to provide housing and employment, including through colocation. Town centre and community uses are identified but only as part of, and ancillary to, a residential allocation. Sites within the Green Belt and exclusively within MOL have not been included.

- 14 A Statement of Common Ground has been proposed by officers of the LBWF as a mechanism to recognise the Authority's requirements in terms of delivering improvements and sustainable growth within its leisure and sporting landholdings and venues and to demonstrate a commitment to work with the Authority through a master planning and Development Performance process to achieve these aims. This would be submitted alongside the Proposed Submission Site Allocations document as part of the Examination process. It is also the case that now the Local Plan Part 1 has been adopted there are strategic and development management policies in place to support the Authority in bringing forward enhancements and development at the Ice centre and WaterWorks Centre to improve and grow the visitor, sporting and wider cultural offer of these venues. Further discussions will be held between both parties to produce the Statement of Common Ground for submission as part of the Part 2 Site Allocations Examination process.

15 Site Allocations Previously Identified as of Relevance

In response to the previous Regulation 19 round of consultation, the Authority commented on 11 site allocations considered relevant to the Regional Park. These are listed below with site reference numbers in brackets and shown on the plans attached at Appendix B to E to this report:

South Waltham Forest

- Leyton Mills Retail Park (R19001) and New Spitalfields Market (R19002) situated outside but adjacent to the Park opposite the Lee Valley Hockey and Tennis Centre (LVH&TC).
- Low Hall Depot (R19055) note this site has been extended as part of the current consultation – it sits partially within the Park to the north east of Walthamstow Marshes.
- Argall Avenue Industrial Area (R19040) and Rigg Approach Industrial Area (R19041) - the north east portion of the Argall Avenue site and all of the Rigg Approach are located within the Regional Park.
- Lammas Rd Industrial Area (R19042) and Orient Way Industrial Area (R19043) - the Lammas Road industrial estate is located within the Regional Park adjacent to the Lee Valley WaterWorks centre and Nature Reserve. Orient Way Site Allocation is set back some distance from the

Regional Park behind Lammas Rd and Orient Way itself.

Central Waltham Forest

- Blackhorse Lane Industrial Area (R19080) located outside the Park adjacent to Walthamstow Reservoirs Site of Special Scientific Interest (SSSI), which forms part of the Lee Valley Special Protection Area (SPA) and Ramsar.

North Waltham Forest

- North Circular Industrial Area (R19034) - situated outside but adjacent to the Regional Park boundary, north of Banbury Reservoir and south of North Circular.
- Motorpoint, Sewardstone Road (R19027) and 3 Lea Valley Road (R19028) – both sites are within the Park east of the King George's and William Girling Reservoirs.

16 The main concerns raised by the Authority during this previous consultation were focused on the content of the Site Requirements and Placemaking Plans included as part of each Site Allocation, to ensure that they:

- provided for sufficient open and amenity space within each site to meet the needs of new residents, incorporating urban greening and tree planting where appropriate;
- considered the visual and ecological impacts of future development in relation to the Park, providing appropriate buffers, complementary on site habitats, dark corridors and landscaping to enhance ecological connectivity;
- provided clarity on the height parameters of new development taking into consideration views through into both the Regional Park (including views to the north 'up the valley') and the Queen Elizabeth Olympic Park (QEOP); maintaining views south through to the Lee Valley VeloPark will be important for example;
- provided for enhanced walking and cycling connectivity with the Park and improved the public realm of key routes through the Park particularly where sites lie adjacent to main east west routes; and
- identified the need for enhancements to adjacent waterways such as the Flood Relief Channel, Dagenham Brook and their biodiversity value, landscape and water quality.

The Authority also sought the inclusion of the Regional Park as a relevant Planning Designations in each of the site allocations.

17 A large proportion of the above concerns have been addressed in the current Proposed Submission version of the Site Allocations with additional relevant development requirements added which could benefit the Park, and this is to be welcomed. The Lee Valley Regional Park has now been added as a relevant Planning Designation to all the Site Allocations within and adjacent the Park. These changes can be supported and are detailed in the letter at Appendix A to this report.

18 **Leyton Mills Supplementary Planning Document**

In July 2024 the Leyton Mills Supplementary Planning Document (SPD) was adopted by LBWF. This sets out detailed guidance on how future development

and associated infrastructure can be brought forward across 3 key development sites, and the Lee Valley Hockey & Tennis Centre (LVH&TC). The 3 development sites are included in the Site Allocation document, namely the Leyton Mills Retail Park (R19001), the New Spitalfields Market (R19002) and the Temple Mills Bus Depot (R19085). Officers from the Authority were involved in discussions with the Council and other stakeholders on the content and detail of the development framework and Members considered a report on this matter in April this year Paper RP/80/24.

- 19 **The SPD identifies Eton Manor as a Suitable Alternative Natural Greenspace (SANGS) and this is mirrored in the Site Allocations document with Eton Manor identified as a SANGS site to which developer contributions will be directed.** This means it is considered suitable for potentially providing visitor uplift capacity for the new homes proposed within South Waltham Forest. Officers have worked with LBWF on the SANGS requirement for Eton Manor/LVH&TC and have been clear that more detailed work will be required on the ability of this site to provide SANGS for development given the Authority's evolving plans for improvements to sporting facilities at the venue. Following the Authority's response to the SPD it has been clarified that the exact arrangement and approach for SANGS provision will be developed in discussion between Lee Valley Regional Park Authority (LVRPA) and LBWF. All three site allocations require development to "Support the principles of and ensure compliance with the Leyton Mills SPD (2024).

- 20 **Locations Suitable for Tall Buildings at Rigg Approach and Lammas Road** It should be noted that alongside the re-designation of the southern part of the Rigg Approach Strategic Industrial Location as a Locally Significant Industrial Site (LSIS) the Council have amended the site allocation to allow for the delivery of approximately 390 new homes including affordable housing. This 'area of change' is identified on the Placemaking Plan and is adjacent to the road frontage. This is subject to the agreement of a two-stage industrial masterplan. The site allocation also requires the Greyhound Pub to be re-provided, public realm on to Lea Bridge Road to be enhanced and the delivery of tree planting and coordinated landscaping. The area of change is also the portion of the site considered as a 'location suitable for tall buildings' under the changes proposed to the Policy Map. This is defined as buildings of 18 storeys or more with an indicative range of 18 to 20 storeys.

- 21 **A similar change has been made to the Lammas Road Industrial area.** The northern portion of the site adjacent to Lea Bridge Road has been redesignated as a Locally Significant Industrial Site and designated as suitable for tall buildings with an indicative range of 18 to 20 storeys. It is identified as an Area of Change potentially capable of providing space for 240 new homes, also subject to the agreement of an industrial masterplan. In both cases development proposals are to provide "as a minimum, and in addition to any other uses introduced in the Areas of Change, the full replacement of existing industrial capacity with industrial uses that are acceptable in a Strategic Industrial Location and seek to provide an uplift in industrial capacity through the provision of multi-storey schemes and more efficient building typologies". Please refer to the plan included as Appendix E to this report which shows the Areas of Change.

- 22 **An objection should be raised to the tall building designation as it applies to the Areas of Change within the Rigg Approach and Lammas Rd site allocations and as proposed to be shown on the Policy Map.** These new designations identify

areas suitable for tall buildings fronting on to Lea Bridge Road and the main open spaces of the Regional Park. They will have a considerable impact on the visual amenity and visitor enjoyment of the Park. The replacement of low level industrial buildings with blocks up to 18 or 20 storeys would draw the surrounding urban area further into the Park eroding the open nature of the Park and interrupting views of the open skyline that typifies the open space character of the Walthamstow Marshes and Waterworks Nature Reserve.

- 23 The Lee Valley Regional Park Landscape Strategy Guidelines seek to protect the open character of the landscape in this section of the Park, highlighting the need to protect areas where open skylines predominate particularly given their sensitivity to development which may alter the skyline (LCA C3 and E2.). The Guidelines recognise the need for development adjacent to the Park to enhance the existing landscape framework so that it can integrate physically and visually with the open and marshland character. The harsh and visually intrusive development edges to the east and around Lea Bridge should be improved.
- 24 At this stage there is no indication that the evidence base underpinning the site allocations have taken account of the Regional Park and its openness in respect of the additional tall buildings designation for these areas. References to buffer habitat and new green edges and the design and siting of buildings to protect and enhance the openness will not be sufficient to overcome the enclosing and barrier effect of tall buildings in these locations, particularly given the cumulative impacts with consented schemes such as the Lea Bridge Station sites which include residential blocks with heights of 23 and 26 storeys. The Authority has not been sighted on the industrial masterplans for these areas so has had little input into the masterplan process. The nature of development within the Lammas Rd industrial estate is particularly relevant to the Authority given its longer term plans to bring forward the Waterworks centre and car park for visitor accommodation and related leisure uses.
- 25 **Folly Lane Traveller Site (R19127)**
It should be noted that the Local Plan Part 2 has included allocations for the two existing sites for Gypsy and Travellers accommodation in the borough so that through the intensification of these sites the Council can meet identified need in at least the first five years of the Plan Period. One of these allocations is for the well-established traveller site at Folly Lane within the Regional Park and the Green Belt situated east of Banbury Reservoir, (please refer to the plan at Appendix D). Policy 22 Gypsies and Travellers and Travelling Showpeople in the Local Plan Part 1 protects existing provision and supports the intensification of existing sites to provide additional pitches as long as this meets certain criteria in terms of the provision of facilities, parking, open space and play areas, connections to services and public transport.

ENVIRONMENTAL IMPLICATIONS

- 26 There are no environmental implications arising directly from the recommendations in this report but the draft Local Plan Part 2 Site Allocations for Waltham Forest, once adopted will contain site requirements for development proposals within the borough that could have an impact on the protection, enhancement, and development of the Regional Park.

FINANCIAL IMPLICATIONS

- 27 There are no financial implications arising directly from the recommendations in

this report.

HUMAN RESOURCE IMPLICATIONS

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

LEGAL IMPLICATIONS

- 29 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.
- 30 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

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

EQUALITY IMPLICATIONS

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

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BACKGROUND REPORTS

The London Borough Waltham Forest Local Plan Part 2 August 2024
(Site Allocations) Proposed Submission Consultation

PREVIOUS COMMITTEE REPORTS

Regeneration & Planning Committee	RP/11/17	Consultation by London Borough of Waltham Forest on the draft Local plan	14 Dec 2017
Regeneration & Planning Committee	RP/32/19	Consultation by London Borough of Waltham Forest on Regulation 18 draft Local Plan document	19 Sept 2019
Regeneration & Planning Committee	RP/57/21	Consultation by London Borough of Waltham Forest on Proposed Submission Regulation 19 draft	16 Dec 2021

Local Plan Part 2
Site Allocations

APPENDICES ATTACHED

Appendix A	The Authority's draft response to the London Borough of Waltham Forest
Appendix B	Plan showing sites allocated within Park on Lea Valley Rd
Appendix C	Plan showing Low Hall area and Spitalfields New Market site allocations
Appendix D	Plan showing industrial site allocations adjacent to the Park at North Circular and Blackhorse Lane
Appendix E	Plan showing industrial site allocations within the Park at Rigg Approach, Argall Ave, Lammas Rd and Orient Way

LIST OF ABBREVIATIONS

MOL	Metropolitan Open Land
LBWF	London Borough of Waltham Forest
PDF	Park Development Framework
SSSI	Site of Special Scientific Interest
LVH&TC	Lee Valley Hockey and Tennis Centre
GLA	Greater London Authority
SPD	Supplementary Planning Document
QEOP	Queen Elizabeth Olympic Park
SIL	Strategic Industrial Location
GB	Green Belt
LSIS	Locally Significant Industrial Sites
SPA	Special Protection Area
SANGS	Suitable Alternative Natural Greenspace
LVRPA	Lee Valley Regional Park Authority
SINC	Site of Importance for Nature Conservation



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19 September 2024

Dear Sarah

RE: CONSULTATION ON THE LOCAL PLAN PART 2 SITE ALLOCATIONS PROPOSED SUBMISSION VERSION 2024 - LEE VALLEY REGIONAL PARK AUTHORITY REPRESENTATIONS

Thank you for consulting the Regional Park Authority on the Local Plan Part 2 Site Allocations Proposed Submission Version 2024. A report on this matter was considered by the Authority's Members at the Lee Valley Regeneration and Planning Committee on the 19th September 2024 when the following representations were agreed.

Proposed Submission version Local Plan Part 2 Site Allocations Document

The Authority previously commented on 11 of the Site Allocations included within the earlier draft Regulation 19 version of the Local Plan Part 2 Site Allocations (November 2021). It is noted that this Proposed Submission Version has been updated following the consideration of all consultation comments, the evidence produced to inform the Local Plan Part 1 examination and additional studies and evidence/masterplans produced to support preparation of the Local Plan Part 2. The Authority's comments on the changes made and any new matters are set out below under the relevant Site Allocation. These will be formally submitted as representations to the Part 2 Local Plan by the deadline of the 9 October.

South Waltham Forest

Leyton Area

Site Allocations - Leyton Mills Retail Park (R19001), New Spitalfields Market (R19002) and new allocation Temple Mills Bus Depot (R19085).

The Authority's previous comments on the site allocations for Leyton Mills Retail Park and New Spitalfields Market were largely supportive. The Temple Mills site is a new allocation and all 3 sites lie outside the Regional Park opposite the Lee Valley Hockey and Tennis Centre (LVH&TC). More recently the Authority was involved in discussions

with the Council and responded to the consultation on the Leyton Mills Supplementary Planning Document (SPD). The SPD covers the 3 sites and the LVH&TC and was adopted by the Council in July 2024.

The Authority maintains its support for the site requirements included across the 3 allocations which require development proposals to address connectivity and access enhancements as follows:

- Deliver new pedestrian and cycling connectivity through the sites linking with the new proposed station at Ruckholt Rd, with Leyton Station in the case of the allocation for Leyton Mills Retail Park and with the Queen Elizabeth Olympic Park (R19001 Point k and 19002 Point O)
- provide safe crossing points over Ruckholt Road/Eastway and Temple Mills Lane (19002 Point O and 19085 Point I)
- Safeguard land for and contribute to a new green cycle and pedestrian bridge linking the site at Leyton Retail Park into the Queen Elizabeth Olympic Park (R19001 Point L, R19002 Point H and 19085 Point)

An amendment is required however to include reference to the Regional Park alongside reference to Queen Elizabeth Olympic Park (QEOP) as these connections will open up access to the wider Regional Park both to the north and south of the sites.

Views

The Authority previously highlighted the need for the Placemaking Plans to consider views through into both the Regional Park (including views to the north 'up the valley') and the QEOP; maintaining views south through to the Lee Valley VeloPark. This is covered in full under Point O within site 19001 Leyton Mills Retail Park and is supported.

Biodiversity

Site Requirements for new and enhanced greening and biodiversity throughout the 3 sites is also supported (R19085 Point J, R19002 Point N and R19001 Point H).

In particular the requirement for development proposals on the New Spitalfields Market site to provide ecological and biodiversity enhancements to the setting of the Old River Lea and Hackney Marshes (R19001 Point K 19002) is welcome. These specify a green buffer at least 30m from the river edge and at least 15m from the edge of Hackney Marsh ensuring buildings are set back and limited in height closest to the buffer. It is noted that public access is also to be restricted within the 30m green buffer and this will help to protect the Old River Lea which is designated as a Site of Importance for Nature Conservation. Consideration should be given to light pollution and the avoidance of light spill within this green buffer adjoining the river. The Authority previously sought the inclusion of a 'dark corridor' along this sensitive western edge of the site where it boards with the Regional Park and Hackney Marshes and this should be included as part of the Placemaking Plan in order to enhance the existing wildlife corridor and ecological connectivity.

The Placemaking Plan shows a new ecological park to be provided within the northern portion of the New Spitalfields Market site together with the de-culverting of the Dagenham Brook (Point L). A new public square and other linked public spaces throughout the site is also a site requirement to support cultural activities and outdoor play as well as catering for pop up events (Point J). These site requirements are supported as they address the points previously raised by the Authority which sought

to ensure that each new development would be able to provide all the open space, amenity and recreational/leisure needs required by new residents and employees.

The Authority notes the provision under each of the above three Site Allocations that development will be required to “Support the principles of and ensure compliance with the Leyton Mills SPD (2024) and this is welcomed. The Authority still has concerns about the ability of the Eton Manor site to meet the requirements for SANGS (as identified in the Infrastructure List) and provide an uplift in visitor capacity for the new homes proposed in South Waltham Forest. More detailed work will be required on this matter given the Authority’s evolving plans for improvements to sporting facilities at the LVH&TC venue and the adopted SPD clarifies this point by stating that the exact arrangement and approach for SANGS provision will be developed in discussion between LVRPA and LBWF.

Low Hall Strategic Location

Low Hall Depot Industrial Area (R19055)

The Low Hall Depot Industrial Area allocation sits partially within the Park to the north east of Walthamstow Marshes. The Lee Valley Regional Park reference has been added as one of the relevant Planning Designations in the site allocation and this is welcomed. Policy 82 Lee Valley Regional Park in the Local Plan Part 1 Strategic Policies will apply.

It is noted that the site allocation no longer includes a housing allocation and is now focused on improvements to the existing depot facility and the provision of modern, flexible industrial uses, to reflect its re-designation as SIL. Enhanced public realm with biodiverse landscaping must also be provided.

The Authority previously supported the requirement for development to deliver improvements to Low Hall Flood Meadows and sought also to expand this requirement with reference to the need for a river restoration scheme for the Dagenham Brook. The Planning Requirement under Point E covers both these points stating that “ecological and biodiversity enhancements to the setting of the Dagenham Brook and to the Low Hall Flood Meadows, including implementation of a river restoration scheme and the retention of mature trees bordering the brook”

Point G also requires the design and siting of buildings and new green space to protect and enhance the integrity of the Low Hall Farm and Low Hall wood and the openness of Walthamstow Marshes/Hackney Marshes MOL and requires a lighting strategy to ensure development does not negatively impact existing ecology. Both these Planning Requirements, (Point E and G) are supported.

An amendment to the Low Hall Placemaking Plan is however required to identify opportunities for pedestrian and cycle connections into the adjoining open spaces so as to reconnect the site with the Regional Park. The previous version of the Placemaking Plan indicated enhanced pedestrian and cycle connectivity between Low Hall Sports Ground and Low Hall Flood meadows. Despite the re-designation of the area as SIL it is still important that this area is linked into the rest of the Regional Park in accordance with the PDF Area 2 Proposals. These proposals (Area Proposals 2.A.3 for Low Hall and St James’ Park) highlight the importance of reconnecting the Low Hall area into the rest of the Park at Walthamstow Marshes and improving the provision of facilities for visitors.

Lea Bridge Strategic Location

Argall Avenue Industrial Area (R19040), Rigg Approach Industrial Area (R19041) and Lammas Road Industrial Area (R19042)

The Authority notes and welcomes the inclusion of the Lee Valley Regional Park as a Planning Designation in respect of the above site allocations. This now reflects the fact that the north east portion of the Argall Avenue site and all of the Rigg Approach and Lammas Road sites are located within the Regional Park, albeit they are designated industrial sites.

Access and Connectivity

The Authority supports the Planning Requirements set out for these sites which require new pedestrian and cycling connectivity to be delivered through and around each site. This is to include links between the sites and with the Regional Park, in particular through contributions to improve the Argall Avenue footbridge over the railway and Flood Relief Channel and into the Park adjacent to the Lee Valley Riding Centre and via contributions to improving the Marsh Lane footbridge over the railway to the south of the Lammas Rd site, (R19040 points D and E, R19041 points J and K and R19042 points G and I). This would help deliver the Authority's PDF Area 2 Proposals 2.A.3 Low Hall and St James' Park and 2.A.6 Lea Bridge Road Area respectively.

The Authority supports the Planning Requirement to "consider the opportunity to resurrect ancient routes such as the Black Path and create better links to nearby landmarks such as the Coppermill Pump House and the Pumphouse Museum and other industrial/archaeological features of the Lea Valley" (R19040 Point F and R19041 Point M).

The Authority's previous comments on the need for improvements to the Lea Bridge Road frontage of the Rigg Approach site have been largely addressed under Point I and this is supported. It states that development proposals will be expected to "Enhance the existing public realm on to Lea Bridge Road to deliver a pedestrian-focused environment with biodiverse green amenity, which is accessible to all." Proposals will be expected to include tree planting and "deliver coordinated landscaping. **An additional point should be included to ensure these improvements also enhance and mark the entrance point into the Regional Park on Lea Bridge Road through appropriate directional and entrance signage incorporated into the public realm and landscaping proposals.**

Biodiversity

It is noted that the Argall Avenue and Rigg Approach Placemaking Plans also seek to provide ecological and biodiversity enhancements to the setting of the River Lee Flood Relief Channel with the requirement that development be set back to "enable access for maintenance and allow new greening to thrive" (R19040 Point J and R19041 Point O). These provisions align well with the Authority's PDF Proposals and are supported. The Authority also supports development requirements for the Lammas Road Industrial Area for new and enhanced greening and biodiversity throughout and around the site including the provision of tree planting, green spaces and green roofs (R19042 Point J). Reference has also been included to protect and enhance the openness of the adjoining MOL and the sensitive context of the WaterWorks Centre and Nature Reserve. (R19042 Point K).

Locations Suitable for Tall Buildings within the Areas of Change at the Rigg Approach and Lammas Road Site Allocations

It is noted that the both the Rigg Approach and the Lammas Road site allocations have been amended to allow for the potential co-location of residential and industrial floorspace. A section of each site adjacent to Lea Bridge Road is identified as an Area of Change to accommodate the residential element, having been redesignated as Locally Significant Industrial Sites. In both cases this is subject to the agreement of a two-stage industrial masterplan. The area of change is also the portion of the site considered as a 'location suitable for tall buildings' under the changes proposed to the Policy Map. This is defined as buildings of 18 storeys or more with an indicative range of 18 to 20 storeys.

The Authority does not consider the Area of Change within the two sites to be suitable locations for tall buildings given their location within the Regional Park and adjacent to important areas of open recreational space most of which are protected for their ecological value. This proposal is considered unsound and an objection will be raised as part of the Authority's formal representations.

It is recognised that the reconfiguration of the allocated sites to allow for residential adjacent to and on either side of Lea Bridge Road will also provide opportunities to enhance this entrance into the Regional Park along Lea Bridge Road, including through the provision of a well-designed landscaped public realm and improved access. These elements are included as development requirements in the site allocations, as is the need to design and site buildings and new green space so that it protects and enhances the integrity of adjoining Lea Valley SIN and openness of Walthamstow/Hackney Marshes MOL.

However the new designation for these areas of change as 'locations suitable for tall buildings' would open up the potential for tall buildings within the Park, on either side of Lea Bridge Rd and along the eastern boundary of the Lee Valley WaterWorks Centre. This would present a considerable change to the character of the Regional Park compared to the existing low scale industrial buildings that are largely hidden from view behind existing vegetation and trees. Despite the Site Allocation requirements for public realm and landscape improvements, tall buildings in these locations will both enclose and intrude upon the adjoining open landscape character of the Regional Park and the current visitor perception of openness and removal from the surrounding urban area. Tall buildings in these locations would create a further barrier at the Park edge, their considerable height interrupting views of the open skyline that typifies the open space character of the Walthamstow Marshes and Waterworks Nature Reserve. There would also be a cumulative impact given the proximity of consented schemes such as the Lea Bridge Station sites which include residential blocks with heights of 23 and 26 storeys.

This designation would be contrary to Local Plan Part 1 Policy 82 'Lee Valley Regional Park', which requires development proposals which affect the Park to "Be sensitive and proportionate, and not contribute to adverse impacts on amenity, ecological integrity or visitor enjoyment..." (section A.iii.). It would also be contrary to the Lee Valley Regional Park Landscape Strategy Guidelines which seek to protect the open character of the landscape in this section of the Park, and which highlight the need to protect areas where open skylines predominate particularly given their sensitivity to development which may alter the skyline (LCA C3 and E2.). The Guidelines seek to ensure development adjacent to the Park enhances the existing landscape framework so that it can integrate physically and visually with the open and marshland character

and that the harsh and visually intrusive development edges to the east and around Lea Bridge should be improved.

The nature of development within the Lammas Rd industrial estate and the proposal to allow tall buildings is particularly relevant to the Authority given its longer term plans to bring forward the Waterworks Centre and car park for visitor accommodation and related leisure uses. The Authority has not be sighted on the two stage industrial masterplans referenced for Lammas Road and the other site allocations.

Hence the Authority objections to the tall building designation as part of these site allocations and in terms of the changes proposed to the Policy Map.

Orient Way (R19043)

The Orient Way SIL Site Allocation is set back some distance from the Regional Park behind Lammas Rd and Orient Way itself. Part of this site is also now identified as suitable for tall buildings and allocated for 320 new homes as well as industrial floorspace. The site requirements have been amended to take on board the Authority's previous comments about integrated green and biodiverse corridors linking into the Park and include under Point J the requirement that greening and biodiversity should be delivered throughout and around the site and that "Consideration should be given to how greening integrates with adjacent sites to create interconnected green corridors throughout the area and into the Regional Park". This amendment is supported.

Central Waltham Forest

Blackhorse Lane Industrial Area (R19080)

This site allocation is located outside the Park adjacent to Walthamstow Reservoirs SSSI which forms part of the Lee Valley SPA and Ramsar site. The Authority maintains its support for the inclusion of Site Requirements that identify the delivery of green infrastructure and open green space alongside the shared boundaries with the Park. Support is also given for development proposals to deliver new pedestrian and cycling connectivity throughout with links to the Walthamstow Wetlands and with existing walking and cycling provision to the north, (Points I, L, and M).

The new site requirement set out under point P is endorsed where it states: "*Design and site buildings and new green space to protect and enhance the integrity of the Walthamstow Reservoirs / Walthamstow Marshes Site of Special Scientific Interest (SSSI), RAMSAR and Special Protection Area (SPA), and the Lea Valley Site of Importance for Nature Conservation (SINC), and the associated Green Corridor. The use of lighting or light pollution should be appropriately mitigated through a lighting strategy to ensure it does not negatively impact the existing ecology.*"

This relates to Local Plan Part 1 Policy 82 'Lee Valley Regional Park' bullet point C) where it requires planning applications for development at Blackhorse Lane to be accompanied by a project level HRA to ensure development does not cause any "*adverse urban effects on the integrity of the Lee Valley SPA and Ramsar.*"

North Waltham Forest

SA63 North Circular Industrial Area (R19034)

This strategic industrial allocation is situated outside the Regional Park south of the north circular and north of Banbury Reservoir. A detailed set of site requirements are now included which address the Authority's previous comments and this is welcomed. In particular the Authority supports the requirement to enhance existing pedestrian and cycling connectivity including improvements to the underpass along the towpath under the North Circular (Point B) and requirements to extend connections through to Banbury Reservoir "as well as providing access to strategic recreational routes such as the Lea Valley Walk and the Lee Valley Pathway", (Point C). Applicants are also advised to engage with the Regional Park Authority to understand how aspirations for the development of the site can align with wider development proposals.

Previous reference to strategic cycle and pedestrian connections through to Meridian Water are however missing and should be reinstated. Edmonton Marshes the new area of public open space being created as part of the phased development at Meridian Water will be located opposite the Site Allocation to the west and provide further connections for cyclists and pedestrians through to Meridian Water Station and Tottenham Marshes.

Site requirements have been included to ensure the design and location of buildings and new green space both protects and enhances the integrity of the Lea Valley Site of Importance for Nature Conservation (SINC), and the associated Green Corridor. These requirements are endorsed as is the requirement that the use of lighting or light pollution resulting from industrial uses should be appropriately mitigated through a lighting strategy to ensure there is no negative impact on the existing ecology. (Point G).

Folly Lane Traveller Site (R19127)

The new site allocation for Folly Lane Traveller Site is noted. Whilst the requirement to potentially intensify use at this site to meet needs is recognised an expansion of the site further into the open space and the Regional Park, east of Banbury Reservoir would be contrary to the Park Development Framework (PDF) Proposals and unlikely to be supported by the Authority.

Sewardstone Road Strategic Location

Motorpoint (R19027) and Lea Valley Road (R19028)

Amendments have been made to the planning designations for both site allocations to include a reference to the Lee Valley Regional Park as requested.

These sites are located within the Regional Park and sit opposite each other adjacent to Lea Valley Road, an important east west route through the Park. Both site allocations now include a requirement for development proposals to enhance existing pedestrian and cycling connectivity along Sewardstone Road and Lea Valley Road (R19027 Point G and R19028 Point E) and the Placemaking Plans indicate public realm and public open space enhancements along the road frontages; these amendments are supported. Site requirements also identify the need for development to provide new and enhanced greening and biodiversity throughout and around the sites (Points E and D respectively).

The Motorpoint allocation which also shares a boundary with the William Girling Reservoir (and is identified as suitable for 295 new homes, town centre and community uses) requires development proposals to create a new park in the south west corner of the site and to ensure development protects and enhances the integrity of the Chingford Reservoirs Site of Special Scientific Interest (SSSI), the Lea Valley Site of Importance for Nature Conservation (SINC), and the associated Green Corridor, (Point J). These changes are all supported and have addressed comments previously made by the Authority.

Lee Valley Ice Centre site and the Waterworks Centre and car park

It is noted that the Council have decided not to include a leisure based site allocation for either the Ice Centre or the WaterWorks Centre and car park.

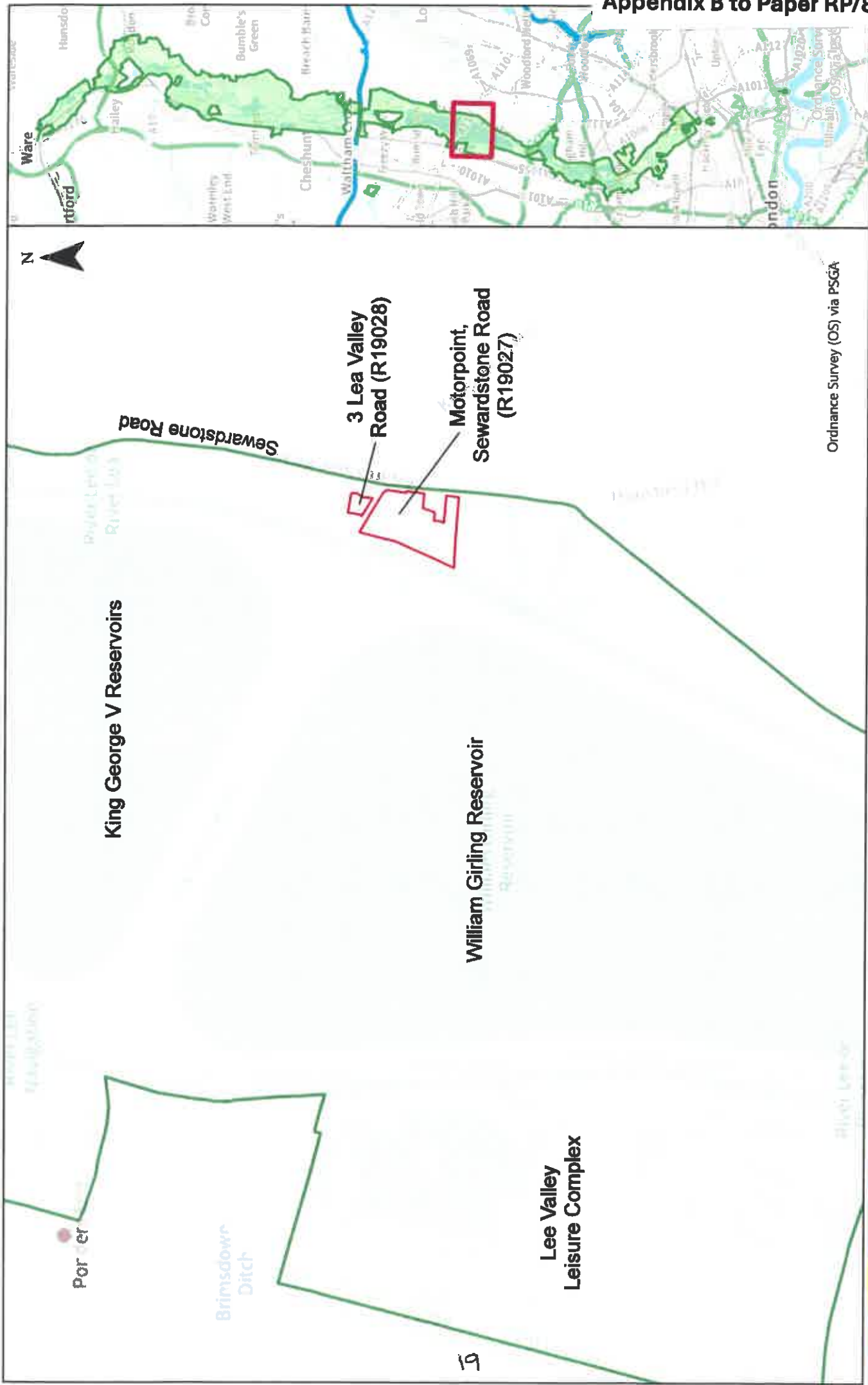
Discussions between officers of the Borough and the Authority have clarified that the Part 2 Local Plan is focused solely on allocating sites to meet needs for housing and employment, and within areas that sit outside Green Belt and MOL designations. The sites within the Regional Park do not therefore meet these requirements. There is however a requirement to ensure the long term future of these sites for leisure use and to enable their enhancement and development to meet changing sporting, recreational and visitor needs over the Plan period in line with the Authority's remit. The recently adopted Local Plan Part 1 contains supportive policies to assist the Authority and the Council in this respect specifically under Policy 82 'Lee Valley Regional Park' and Policy 9 South Waltham Forest which offers support for proposals which "create opportunities to improve and grow the visitor, sporting and wider cultural offer of the Lee Valley Regional Park and its venues; including the Lee Valley Ice Centre, the Lee Valley WaterWorks Centre and the Lee Valley Hockey and Tennis Centre, thereby ensuring their long-term sustainability and contribution to the visitor economy of the borough."

A Statement of Common Ground has also been proposed by officers of the LBWF as a mechanism to recognise the Authority's requirements in terms of delivering improvements and sustainable growth within its leisure and sporting landholdings and venues and to demonstrate a commitment to work with the Authority to achieve these aims, through a master planning and Development Performance process. Further discussions will be held between both parties to produce this document for submission to the Part 2 Site Allocations Examination.

The Authority looks forward to engaging further with Borough officers on the final stages of preparing the LP2 Site Allocations document for examination as part of the Duty to Co-operate process.

Yours sincerely

Claire Martin
Head of Planning



London Borough of Waltham Forest Local Plan: Plan 1 - Site Allocations

-  Park Boundary
-  Site Boundary

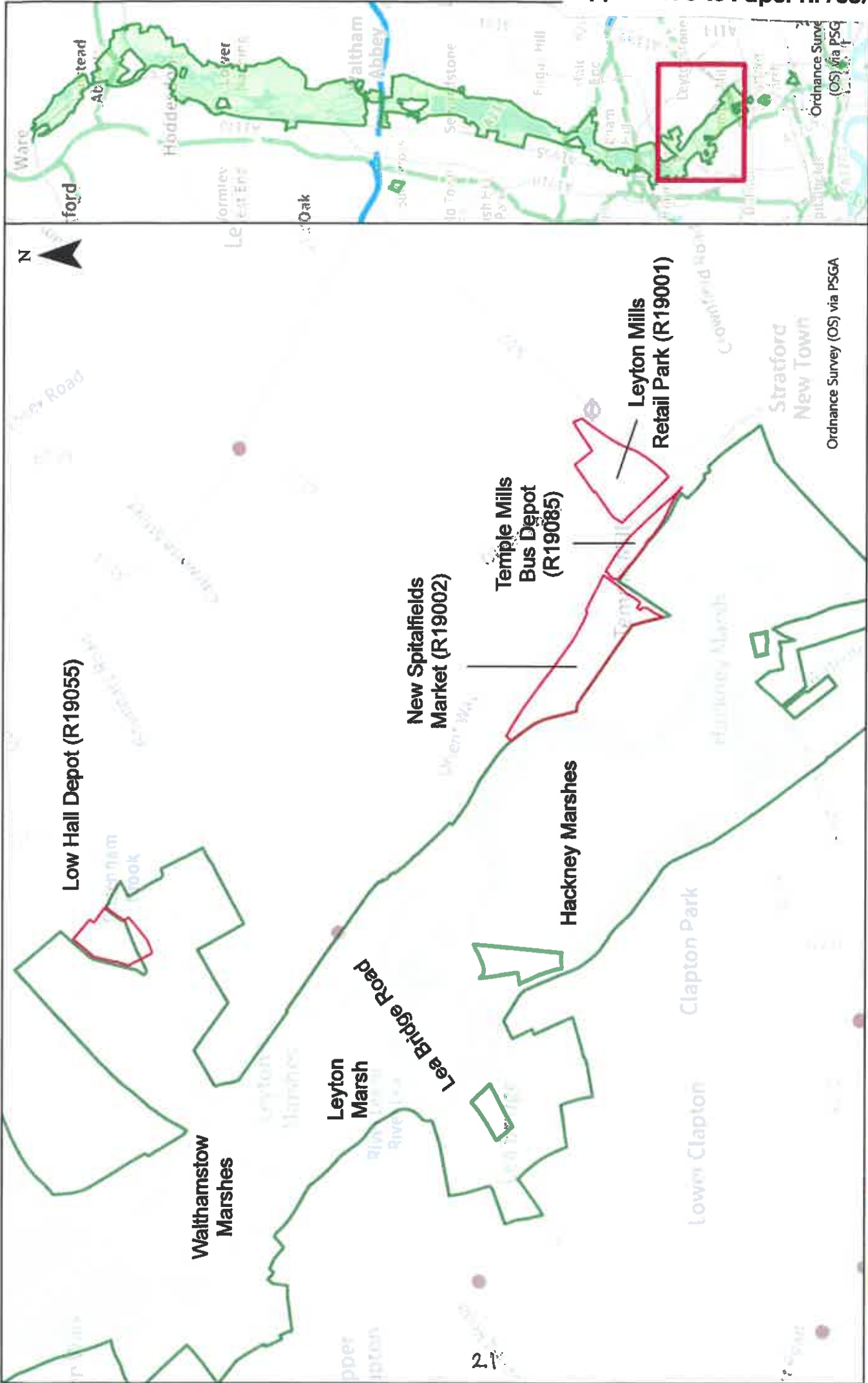
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London Borough of Waltham Forest Local Plan: Plan 2 - Site Allocations
(Leyton and Low Hall Area)

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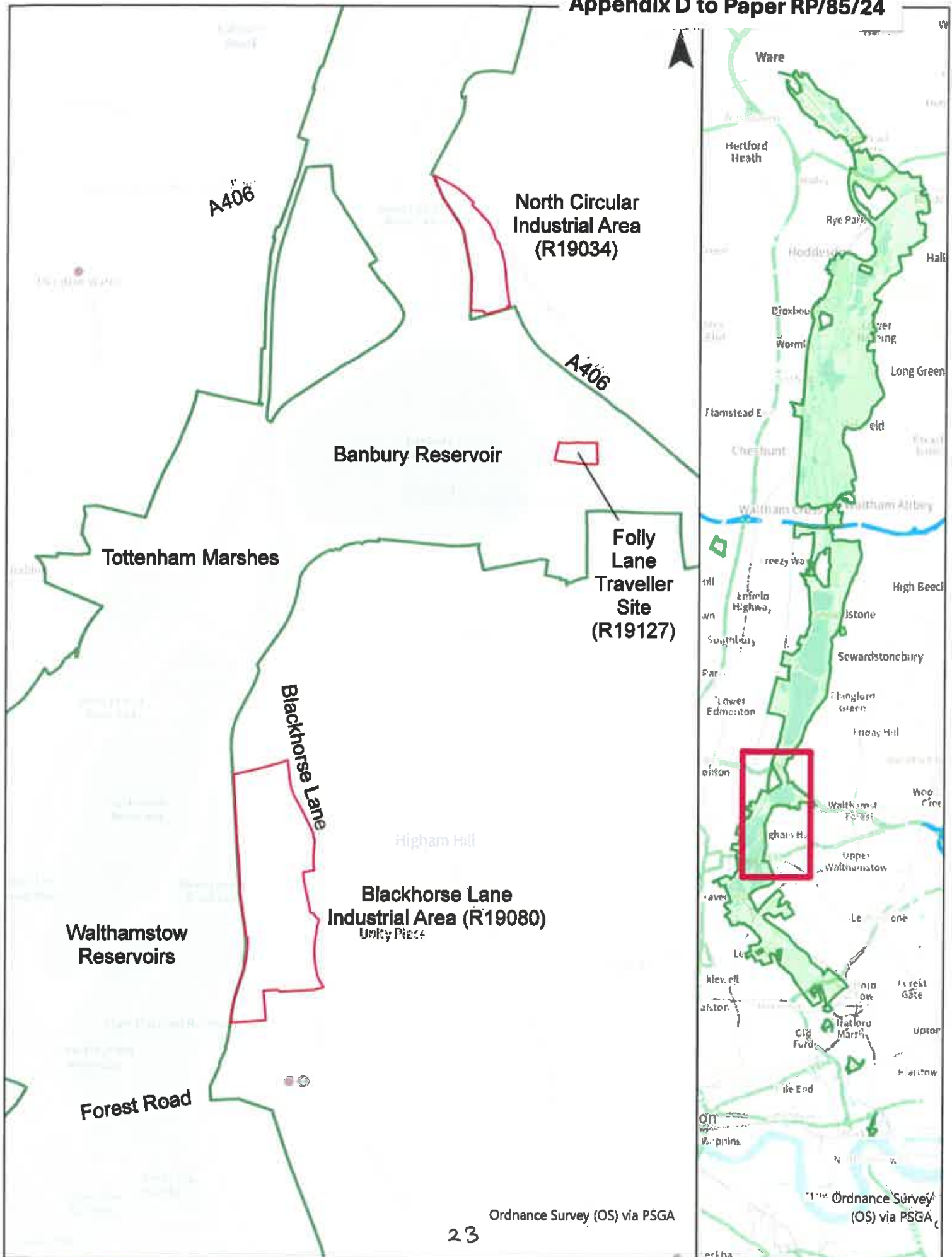
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 Site Boundary
 Park Boundary



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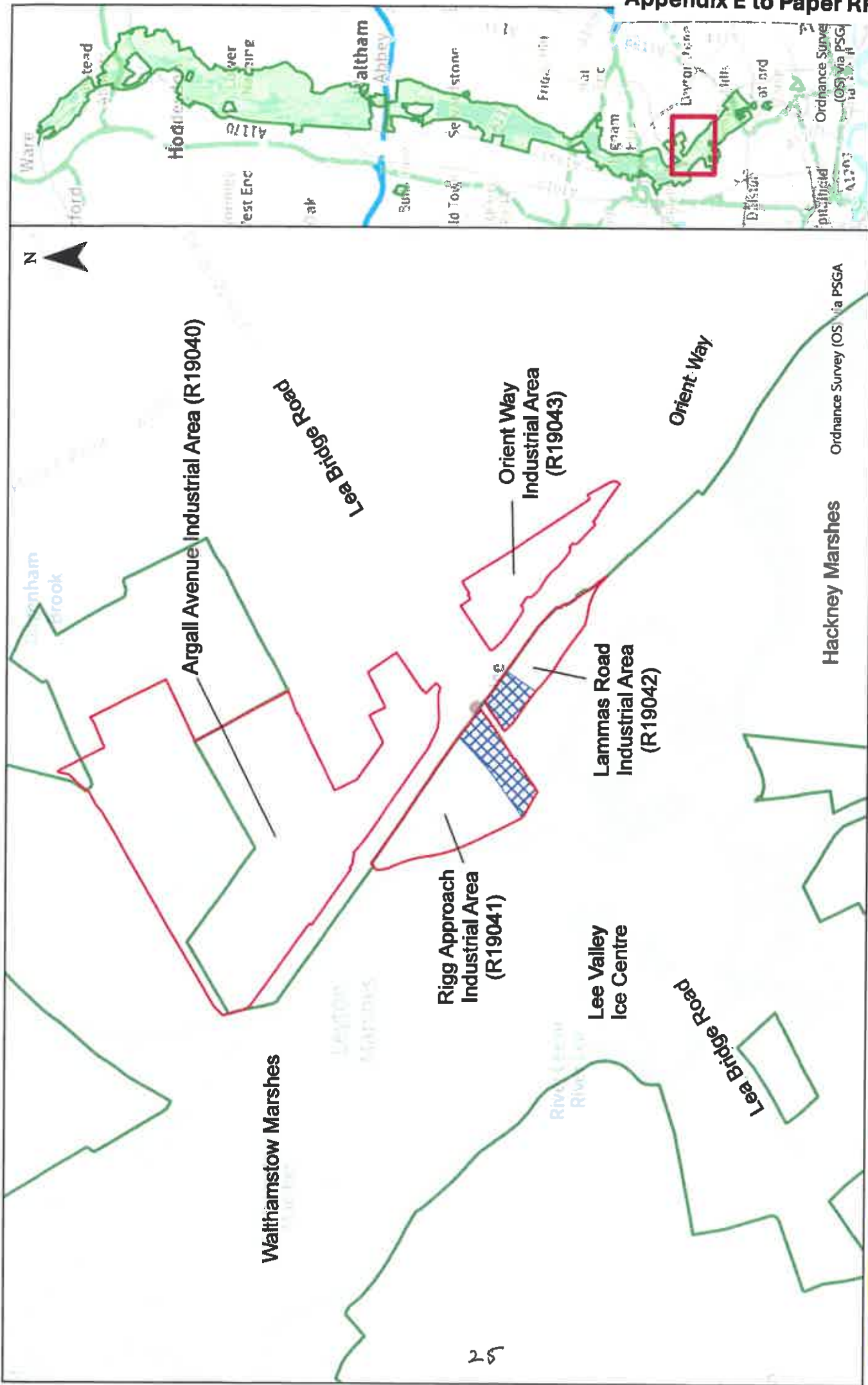


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Ordnance Survey (OS) via PSGA

Ordnance Survey (OS) via PSGA

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London Borough of Waltham Forest Local Plan: Plan 4 - Site Allocations

Site Boundary
 Park Boundary
 Area of Change
Ordnance Survey (OS) via PSGA

London Borough of Waltham Forest Area
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**Lee Valley
Regional Park Authority**

LEE VALLEY REGIONAL PARK AUTHORITY

**REGENERATION AND PLANNING
COMMITTEE**

19 09 2024 AT 11:30

Agenda Item No:

7

Report No:

RP/86/24

**PLANNING CONSULTATION BY EPPING FOREST DISTRICT
COUNCIL**

**INSTALLATION OF HARDSTANDING FOR USE OF LAND IMMEDIATELY
TO THE EAST OF MEADGATE WORKS FOR A MIX OF CLASS B2
(GENERAL INDUSTRIAL) AND CLASS B8 (STORAGE AND
DISTRIBUTION) USE WITH ASSOCIATED HARD AND SOFT
LANDSCAPING; NEW PLANTING AND OTHER SOFT LANDSCAPING ON
THE LAND IMMEDIATELY TO THE NORTH OF MEADGATE WORKS; AND
THE PROVISION OF A NEW NORTH-SOUTH PEDESTRIAN/BICYCLE
ROUTE TO THE EAST OF THE NORTH LAGOON.**

**AT MEADGATE WORKS, MEADGATE ROAD, NAZEING, WALTHAM
ABBAY, EN9 2PD REF: EPF/1330/24**

Presented by Head of Planning

SUMMARY

This is a full application for the extension of an existing industrial/employment area at Meadgate Works within the Regional Park for the purposes of storage. The applicant Lignacite Ltd proposes to extend its business onto land immediately to the east of its existing operations in order to provide additional outdoor storage of concrete blocks, involving the laying of hardstanding but with no permanent structures. The additional space will allow for the provision of new on-site waiting areas for delivery and collection vehicles and staff parking, a substantial landscape buffer to the north and east with additional planting to bolster the existing hedgerow/tree line along the southern edge of the site. An area of biodiversity net gain offset is also proposed within the Park to the north west of the application site.

Although the development proposed would see an expansion of an industrial/employment area within the Regional Park the proposals to increase the storage area and provide improved circulation and parking at Meadgate Works have the potential to remove the need for vehicles to wait and park up on Meadgate Road and the negative consequences of that activity for visitors trying to gain access into the Regional Park at a key entrance point. The Park Development Framework (PDF) Area Proposals are very clear about the need to "Enhance the visual and

environmental quality of Meadgate Road as a key route into the Park particularly at the eastern entrance to the Park.” Given the industrial use already exists within the Park, this improvement together with the proposed landscape and habitat enhancements, providing they are secured by condition are considered sufficient to enable the Authority to offer no objection to the current application.

RECOMMENDATIONS

- Members Approve:
- (1) that Epping Forest District Council be informed that the Authority does not object to the application for the installation of hardstanding for the use of land immediately east of Meadgate Works for industrial and storage purposes provided that conditions are attached to any grant of consent to ensure:
 - a) all business activity is contained within the application site as shown on the Operational Site Plan DWG13 submitted with the application;
 - b) lorries and other vehicles associated with the business are prohibited from parking or waiting along Meadgate Road;
 - c) contributions are sought via a S106 agreement to undertake environmental improvements along Meadgate Road as far west as the anglers car park, to repair and make good the road surface and footway condition in order to provide safe access into the Regional Park for visitors;
 - d) the provision of a more detailed landscape plan including clarity as to whether a 3m noise attenuation barrier is to be provided. A maintenance plan should also be provided to ensure the longevity of the scheme and the protection and maintenance of existing features such as the boundary hedgerow/tree line, particularly given its location within the Regional Park;
 - e) the stacked height of the blocks within the site do not exceed 5m as proposed and are set back 5m from the site boundary;
 - f) the provision of a Construction and Environmental Management Plan; and
 - 2 the Authority would wish to be consulted on the above matters and the Biodiversity Gain Plan and Habitat Management and Monitoring Plan. In

particular the Authority would wish to see that the trading rules are met in terms of the identified shortfall of -4.87 grassland units as referenced in the Biodiversity Net Gain report.

DESCRIPTION OF SITE

- 1 The application site, Meadgate Works, fronts on to both Sedge Green Road and Meadgate Road and forms part of the Green Belt. It is located within the Regional Park south of Dobbs Weir Road and to the east of Nazeing Mead Central/North Lagoon. To the south and east of the site lies a mix of horticultural, residential and industrial uses both within and outside the Park boundary. To the north and west are areas of mixed dense scrub, some grassland, and scattered ruderal growth and the Nazeing Mead Lagoons, please refer to the location plan at Appendix A to this report.
- 2 Meadgate Works is operated by Lignacite Ltd for the manufacture of concrete building blocks. Raw materials such as aggregates are delivered for storage within the yard area whilst the factory building manufactures the blocks. After manufacture the blocks are stored in stacks in the yard before being loaded on to lorries for delivery to the construction industry.
- 3 The application boundary is made up of the existing operational site area and part of the applicant's wider ownership to the east; a site area of 3.27ha. It is understood that Lignacite Ltd intend the increased operational area will support the continued growth of the business. Lignacite Ltd.'s wider ownership extends north all the way to Dobb's Weir Road and towards the North Lagoon and Nazeing Mead in the west, a total with the application site of 12 ha. Please refer to the context plan at Appendix B to this report.
- 4 The application site is positioned adjacent to an important eastern entrance point into the Regional Park with Meadgate Road extending west into the main body of the Park providing access to the Nazeing Meads Lagoons and small angler's car park, the Broxbourne Sailing Club, and a number of interconnecting footpaths and Public Right of Way (PRoW). The Authority recently obtained planning permission for the installation of a new section of the Lee Valley Pathway to connect Meadgate Road in the south with Dobbs Weir Road in the north opening up a new area of the Regional Park. The route and associated habitat and landscape enhancements passes through an area of land which wraps around the Nazeing Meads North Lagoon, part of the Nazeing Meads complex of water bodies. This places the new section of Pathway just to the west of both the application site and the applicant's wider ownership, the line of the new route is shown on the plan at Appendix B to this report.
- 5 It should be noted that the land currently owned by Lignacite (the area outlined in blue – wider ownership and the extension to the application site) was previously owned by the Authority. It formed part of a larger site known as St Paul's Field previously used as gravel workings, and subsequently landfilled. This land was sufficiently contaminated by the landfill lying under its surface as to have precluded its intended use as open space for the public to enjoy, with the cost of remediation to enable this to be possible prohibitive. It was against this background that Members approved that this land to be no longer required for Park purposes and surplus to Authority requirements at the Authority meeting on 27 April 2017 (Report no. A/4242/17). The site was offered for sale on the open market and purchased by Lignacite Ltd in 2018. The capital funds

derived from this sale are being used to create a new section of the Lee Valley Pathway through the retained area of St Paul's Field as described above.

POLICY BACKGROUND

- 6 The National Planning Policy Framework (NPPF) (December 2023) provides a framework for achieving sustainable development and this means that the planning system has three overarching objectives economic, social and environmental, which are interdependent and need to be pursued in mutually supportive ways. The application site includes an existing employment site which together with the wider associated area that sits within the Green Belt. Epping Forest District Council's (EFDC) Local Plan Policy DM4 (B) 'Green Belt' states that "Within the Green Belt planning permission will not be granted for inappropriate development, except in very special circumstances, in accordance with national planning policy". Under Policy E1 'Employment Sites' the Local Plan also seeks to retain and enhance existing designated and undesignated employment sites and premises. The policy says that proposals for the redevelopment, renewal, intensification, or extension of existing employment sites and premises for their existing use will be encouraged (E1 B).
- 7 Local Plan policy DM3 'Landscape Character, Ancient Landscapes and Geodiversity' seeks to ensure development proposals are "sensitive to their setting in the landscape in particular in settlement edge locations, and to its local distinctiveness and characteristics" and expects proposals to take into account existing landscape features from the outset with careful landscaping of the site and sensitive use of design, layout and materials. Policy DM5 A. 'Green and Blue Infrastructure' states that development proposals must "demonstrate that they have been designed to: (i) retain and where possible enhance existing green and blue infrastructure assets, including trees, hedgerows, woods and meadows, green lanes, wetlands, ponds and watercourses and improve connectivity of habitats;.."
- 8 Policy DM1 'Habitat Protection and Improving Biodiversity' states that all development should seek to deliver net biodiversity gain, integrating biodiversity within the development, and protecting and enhancing natural habitats. It also states that "Development proposals must seek to avoid harm to, protect and enhance natural habitats, species, areas and corridors for biodiversity".
- 9 The Local Plan is recognised as having an important role in terms of the protection, enhancement, development and management of the Lee Valley Regional Park (LVRP) and the public enjoyment of its leisure, ecological, heritage, and sporting resources. The Local Plan 2023 recognises and supports the Regional Park, its vision and remit as a key asset for the District, and as a component of the region's green and blue infrastructure (para 2.23). It also recognises the Park Development Framework (PDF), and its specific proposals for the future use and development of the Regional Park including the importance of improving access into and through the Park for pedestrians and cyclists.
- 10 **Park Development Framework**
Park Development Framework (PDF) Area Proposals 7.A.2 "Wetland Park Central and East: Nazeing Meads and Carthagena" apply in this case. These are focused on promoting circular walks within the Wetland Park and improving key pedestrian and cycle paths such as the Lee Valley Pathway, and routes that link with it such as the towpath/Lee Valley Walk, Meadgate Road and PRoW.

Habitat improvements and access to nature are to be delivered throughout the Wetland Park.

- 11 The Landscape & Heritage Proposals under 7.A.2 seek to “Enhance the visual and environmental quality of Meadgate Road as a key route into the Park particularly at the eastern entrance to the Park.” Proposals also identify the need to work with stakeholders to improve the impact on the Regional Park of industrial sites, structures and buildings through measures that contribute to a reduction in noise, traffic generation, visual impacts and intrusion. High quality development is to be sought and particular attention is to be paid to enhancing the boundaries with open space.
- 12 The Lee Valley Regional Park Landscape Strategy identifies the application site as forming part of Landscape Strategy Character Area A3 ‘Glen Faba and Nazeing Meads’ part of a broad valley floor containing a series of wetlands. This area provides an important landscape resource in terms of the rich range of flora and fauna it supports and has a largely cohesive landscape character. The strategy is to conserve and enhance these valued qualities, specifically its wildlife value and opportunities for people to access and enjoy the landscape and appreciate its historic and ecological dimensions.
- 13 The Authority’s Strategic Policies which provide guidance for land use change and development both within and outside the Park state under E2 Effective Use and Management of Land:

“Development proposed on sites either within or outside the Park which could adversely impact on its amenity will be resisted or planning obligations sought in line with other policies within the Plan.”

DESCRIPTION OF DEVELOPMENT

- 14 The development proposals comprise the expansion of the site into undeveloped land next to the existing premises with the installation of hard surfacing for the movement and storage of concrete blocks. This additional storage space will allow for the provision of new on-site waiting areas for delivery & collection vehicles, improved internal circulation and additional space for staff parking within the site. The area to be developed will be capped and contained by the proposed hardstanding, meaning this land which is known to be contaminated will be better controlled as a result of the proposed development.
- 15 The existing factory and office buildings will remain on site in their current locations within the existing operational area. Points of access from and egress to the public highway will remain the same with vehicles entering the site from Meadgate Road and departing via Sedge Green Road. The Transport Statement submitted with the application is clear that the proposals are not expected to result in an increase in vehicle activity at the site but seek to reduce the negative highway impact caused by the current operation. In combination these measures are expected to remove the need for vehicles to extend back and wait on the public highway. The Site Operations Plan DWG13 is attached as Appendix C to this report.
- 16 The applicant proposes to increase the setback of stacked block storage to Sedge Green along the southern boundary in comparison to existing the scenario. The height of the stacked blocks is also stated as being reduced;

from 7m down to a height of 5m. Additional tree planting to bolster the existing hedgerow/tree line along Sedge Green is also proposed giving a 5m wide planted buffer. The potential erection of a 3m noise attenuation barrier is also referenced, as recommended in the noise report submitted with the application.

- 17 The Site Wide Masterplan included in the Design & Access Statement (DAS) also shows a potential extension to what is described as the 'Lee Valley Park Proposed Landscape Path'. A new path is shown passing south from Dobbs Weir Road through land owned by the applicant. It then turns west across the Authority's ownership so as to connect with the route of the new section of Lee Valley Pathway. This route is shown on the Plan attached as Appendix B to this report.
- 18 To the north of the application site a 20m landscape buffer is to be provided to improve the screening of the existing factory building and expanded operation when viewed from the north. Details of the planting buffer are described as layered/scattered tree planting of a range of species to provide a natural appearance and mixed native scrub planting. A similar treatment is proposed along the eastern boundary with a planting buffer of varying width to improve the screening between the expanded operational site and the adjacent residential property Hossana Lodge. The planting buffer is to consist of retained existing trees and hedgerows, tree planting of a range of species and mixed native scrub planting.
- 19 An Ecological Assessment report is provided covering the application site and the land in the applicant's wider ownership. It has found the application site to comprise of rough grassland habitats, with a single hedgerow and that the wider survey area includes areas of scrub, grassland and a ditch network.
- 20 The report concludes that the proposed development is not likely to give rise to any significant adverse impacts on any statutory or non-statutory designated sites, and that subject to the adoption of the mitigation measures outlined within the report, there are no overriding constraints to the site coming forward from an ecological perspective. These mitigation measures include high-quality planting and enhancements with species-rich scrub, grassland and hedgerow to be implemented across the wider survey area, the provision of pole mounted bird and bat boxes, provision of a Construction and Environmental Management Plan (CEMP), and as a purely precautionary position, the proposals for the application site have provisionally been granted a Natural England District Level Licence for Great Crested Newt.
- 21 The applicant is also proposing additional planting and habitat enhancements on land to the north west of the application site within its ownership in order to achieve a BNG of 14.29%, please refer to Appendix D Proposed Site Plan DWG11 to this report.
- 22 The Flood Risk Assessment and SUDs strategy which accompanies the application has concluded that the proposed land at St Paul's Field, Meadgate Road, development site is at a low risk of flooding from all sources.

PLANNING APPRAISAL

- 23 Although the application site and the wider area proposed for biodiversity net gain off set, were declared to be no longer required for Park purposes the current proposal still falls to be considered against the Authority's PDF

proposals and the extent to which it impacts upon the Regional Park, its landscape and ecology. The application site is also wholly within the Green Belt and the extension of the employment and storage use, as acknowledged in the Planning Statement, would by definition be inappropriate development. The applicant has stated there would be some limited harm to openness caused by the development but that Very Special Circumstances (VSC) exist that would outweigh the limited harm arising to the Green Belt.

24 Green Belt

Taking the Green Belt matter first it is evident that the proposal will have spatial and visual impact on the openness of the Green Belt, albeit that the existing operational site is already located in the Green Belt. This harm to openness could be considered limited, as argued by the applicant. The concrete blocks are not permanent structures, and the extended area for storage enables the height of the stacked blocks across the whole application site to be reduced to 5 metres. This visual impact on openness is then reduced or mitigated by new landscaping and green buffers to the front of the site on Sedge Green and to the north, within the Park, with a further area of land set aside for habitat enhancements as part of the Biodiversity Net Gain (BNG) provision.

25 The VSC case provided by the applicant to outweigh the harm to the Green Belt includes the retention and improvement of an established local business providing employment for local people, highway safety improvements which remove lorries from parking up on the local highway, improved views of the site from the within the Regional Park due to new tree planting, a biodiversity net gain of 14.29% exceeding the legal requirement and the provision of a north-south pedestrian / bicycle route to the east of the North Lagoon.

26 There are merits in a number of the elements described above in particular the highway safety improvements and the provision of additional buffer planting and habitat enhancements all of which are relevant to mitigating impacts upon the Park, and these are considered below. The Local Planning Authority will need to decide whether on balance these outweigh the identified harm to the openness of the Green Belt.

27 PDF Proposals and Impacts on the Park

Meadgate Road Entrance

The current proposals to expand the storage area and provide improved circulation and parking at Meadgate Works have the potential to address a long standing issue concerning the status and poor condition of Meadgate Road as a key access into the Regional Park, and help rectify the existing negative impacts created by existing activity (lorries parking up and waiting along the road and footway) at Meadgate Works.

28 The PDF Area Proposals are very clear about the need to "Enhance the visual and environmental quality of Meadgate Road as a key route into the Park particularly at the eastern entrance to the Park." Access into the Park via Meadgate Road whether on foot or by vehicle has been an issue for some time due to lorries waiting, manoeuvring and queuing for entrance to Meadgate Works blocking or restricting access. The poor condition of the road surface, the footway and verges as a result has also raised concerns about the safety of this route for visitors walking and cycling or trying to access the area for sailing and angling.

- 29 The Planning Statement is clear that by extending the employment site into the adjacent land, all of the business activity can take place on site and the "public highway will be unblocked; there will no longer be any need for lorries to reverse out of the site; and cycle parking for employees can be provided within the site which will help to encourage a more sustainable mode of transport". This is confirmed by the Transport Statement which concludes that the proposals are expected to deliver a net benefit in respect of their impact on the public highway, removing the need for vehicles to wait on Meadgate Road and the negative consequences of that activity.
- 30 This would be a positive outcome from the development that would help mitigate for the expansion of the industrial use within the Park, but a condition should be attached to any grant of consent to ensure these highway improvements are secured as part of any expansion of Meadgate Works. S106 contributions should be sought towards environmental and road surface and footway improvements along Meadgate Road itself. This is needed to make good the damage caused by the existing operations and to upgrade this route for pedestrians and cyclists and as an entrance to the Regional Park and Nazeing Meads.
- 31 **Landscape and Ecological Enhancements**
The existing operational site at Meadgate Works sits on the edge of the Regional Park at an important east west entrance point into the Park and as such landscape enhancements are an important consideration when evaluating the proposed expansion of the site. The industrial nature of the site is evident from the stacked blocks clearly visible from Sedge Green Road and upon entry along Meadgate Road with views into the site from within the Park partially screened by existing mature scrub vegetation. Proposals to increase the setback of stacked blocks to Sedge Green and enhance the existing hedgerow/tree line with additional tree planting is welcomed as is the proposal to provide a 20m landscape buffer to the northern boundary. This will assist in screening the existing factory building and areas of new storage to the east whilst also contributing to habitat creation.
- 32 A more detailed landscape plan and planting list should be provided including a maintenance plan to ensure the longevity of the scheme and the protection and maintenance of existing features such as the boundary hedgerow/tree line, particularly given its location within the Regional Park. Native species should be used wherever possible. A condition should also be included, should the Council be minded to grant consent, to ensure the stacked height of the blocks do not exceed 5m as proposed. Clarity is also required as to whether a 3m noise attenuation barrier is to be erected as referenced and recommended in the noise report submitted with the application.
- 33 The mitigation measures outlined in the ecological assessment would ensure the wider biodiversity of the Regional Park is not impacted and that ecological connectivity between areas are maintained. These measures are supported and should also be delivered. A Construction and Environmental Management Plan should therefore be provided, secured via an appropriately worded condition to ensure:
- Precautionary engineering protocols are in place to ensure no pollution.
 - Vegetated buffer zone.
 - Control of dust.

- Sensitive lighting strategy – no light spill onto the adjacent park/our landholdings.
 - Vegetation clearance protocol (two stage clearance) for nesting birds and reptiles.
- 34 The provision of a 14.29% biodiversity net gain is noted and the fact that most of this is to be provided within the Park adjacent to the operational site and along the norther and eastern boundaries is considered appropriate given the nature of the industrial activity taking place on site. The Authority should be consulted on the Biodiversity Gain Plan and the Habitat Management and Monitoring Plan (HMMP). The BNG report notes that whilst there is a +14.29% net gain in the habitats the trading rules have not been met with a shortfall of -4.87 grassland units. It is understood the application was made after BNG became mandatory so this matter should be addressed.
- 35 **New Pedestrian/Cycle Path**
The applicant is proposing to provide a north-south pedestrian/cycle route to the east of the North Lagoon, which would pass through part of the land owned by Lignacite but then need to cross the Authority's landholding to link with the Lee Valley Pathway due to be delivered in the next few months. Whilst the provision of improved pedestrian and cycle access would normally be supported by officers, this additional pathway does not now appear to be necessary, given the route already permitted and due to be constructed by the Authority. Furthermore, the proposed path starts/finishes at a point on Dobbs Weir Road that officers consider is dangerous for crossing and does not actually link to any other path or crossing point. It includes a relatively long section on the Authority's land for which the Authority would not wish to be responsible and finally this additional section could also cause disturbance or litter issues along the ditch which feeds into the lagoon (main river). This element of the scheme is not therefore supported but improvements to the footway and safety of cyclists using Meadgate Road would be considered appropriate and this is proposed as part of the recommendation.
- 36 **Conclusion**
The reconfiguration and extension of the existing industrial site at Meadgate Works provides an opportunity to secure highway safety improvements at a key entrance into the Regional Park and provide a scheme of integrated landscape planting and habitat creation to both buffer and enhance the adjoining areas of open space and parkland. These elements will need to be secured by appropriately worded conditions should the Council be minded to approve the application. Contributions should also be sought towards making good Meadgate Road and associated footway so that it is safe to use by pedestrians and cyclist as well as vehicles. This is important given the Authority's own proposals to open up access into this area of the Park by delivering a new section of the Lee Valley Pathway between Meadgate Road and Dobbs Weir Road. The Authority should also be consulted on the Biodiversity Gain Plan and Habitat Management and Monitoring Plan in due course.

ENVIRONMENTAL IMPLICATIONS

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

FINANCIAL IMPLICATIONS

- 38 There are no financial implications arising directly from the recommendations in

this report.

LEGAL IMPLICATIONS

- 39 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.
- 40 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

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

EQUALITY IMPLICATIONS

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

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BACKGROUND REPORTS

Application Papers 24.069

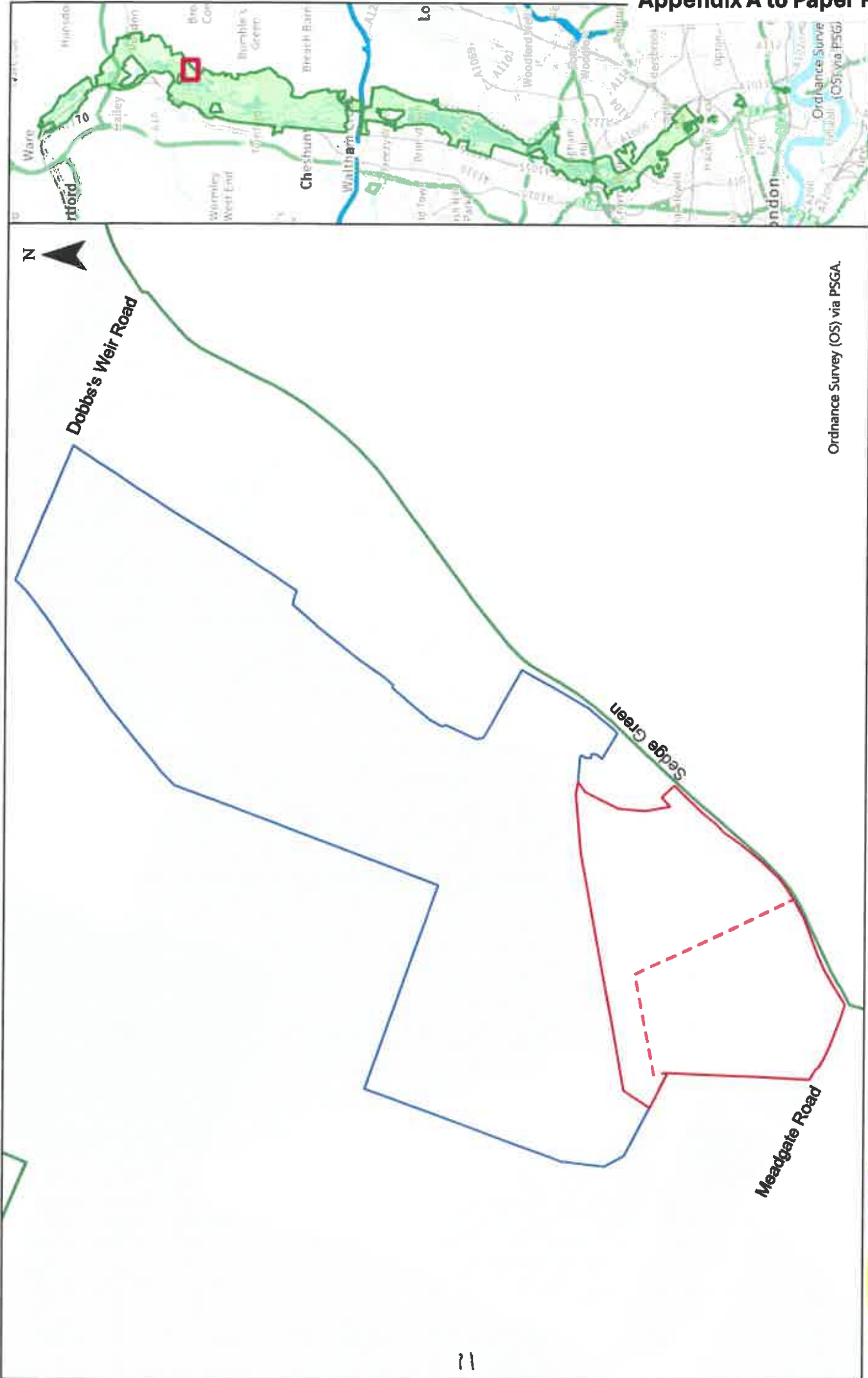
August 2024

APPENDICES ATTACHED

Appendix A	Location Plan of the application site
Appendix B	Context Plan showing applicants wider ownership
Appendix C	Site Operations Plan DWG13
Appendix D	Proposed Site Plan showing area for Biodiversity Net Gain

LIST OF ABBREVIATIONS

EFDC	Epping Forest District Council
LVRPA	Lee Valley Regional Park Authority
PDF	Park Development Framework
DAS	Design & Access Statement
PRoW	Public Right of Way
NPPF	National Planning Policy Framework
CEMP	Construction and Environmental Management Plan
VSC	Very Special Circumstances
BNG	Biodiversity Net Gain
HMMP	Habitat Management Monitoring Plan
SUDs	Sustainable Drainage Systems



Ordnance Survey (OS) via PSGA.

Location plan for the planning application at Lignacite Ltd, Meadgate Works, Nazeing, Waltham Abbey, EN9 2DP

1:5,000 @ A4
02/09/2024

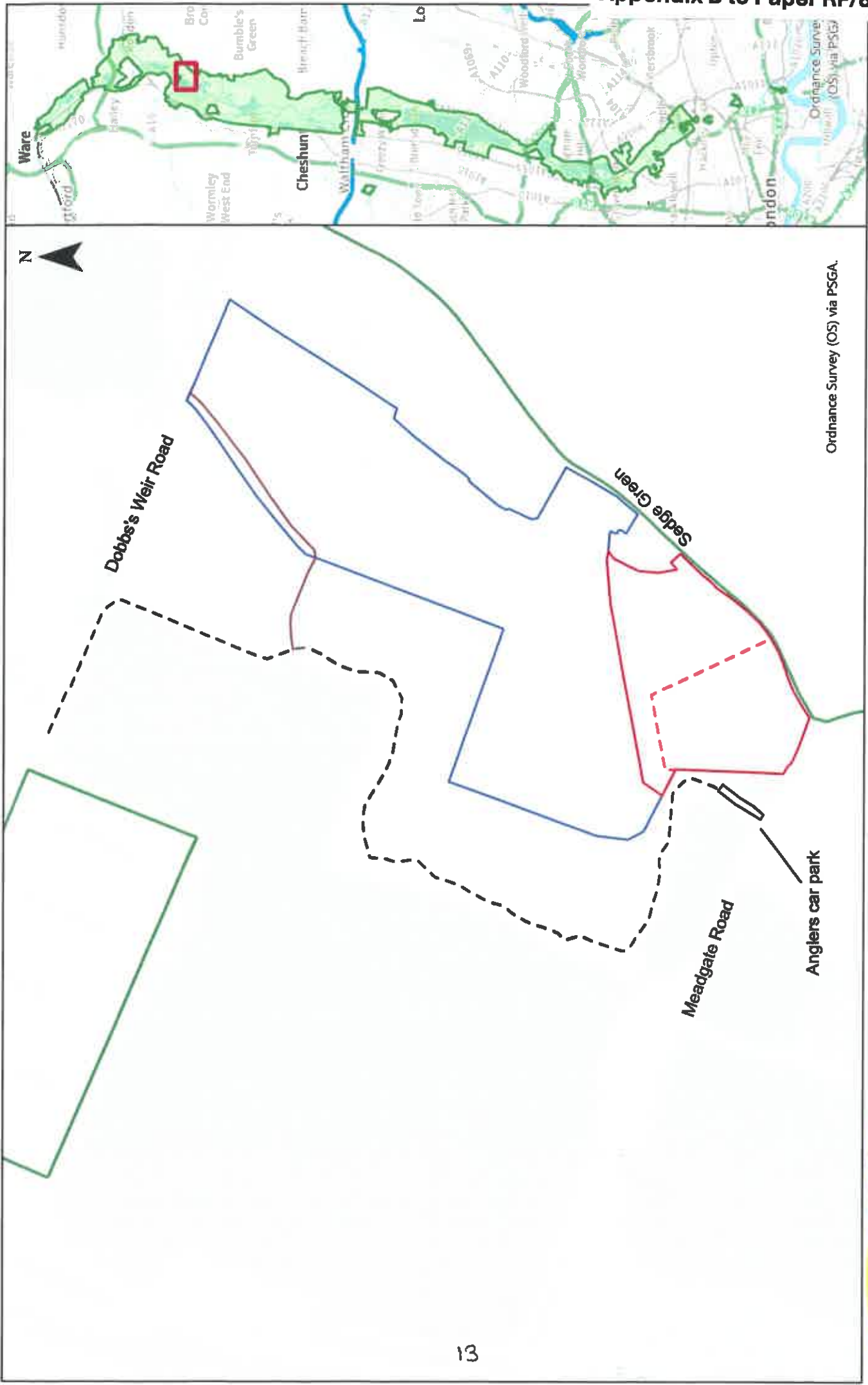
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-  Application Site
-  Existing Operational Site
-  Park Boundary
-  Lignacite Ltd Wider Owners!
-  Park Boundary



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Ordnance Survey (OS) via PSGA.

**Context plan for the planning application at Lignacite Ltd,
Meadgate Works, Nazeing, Waltham Abbey, EN9 2DP**

1:8,000 @ A4
02/09/2024

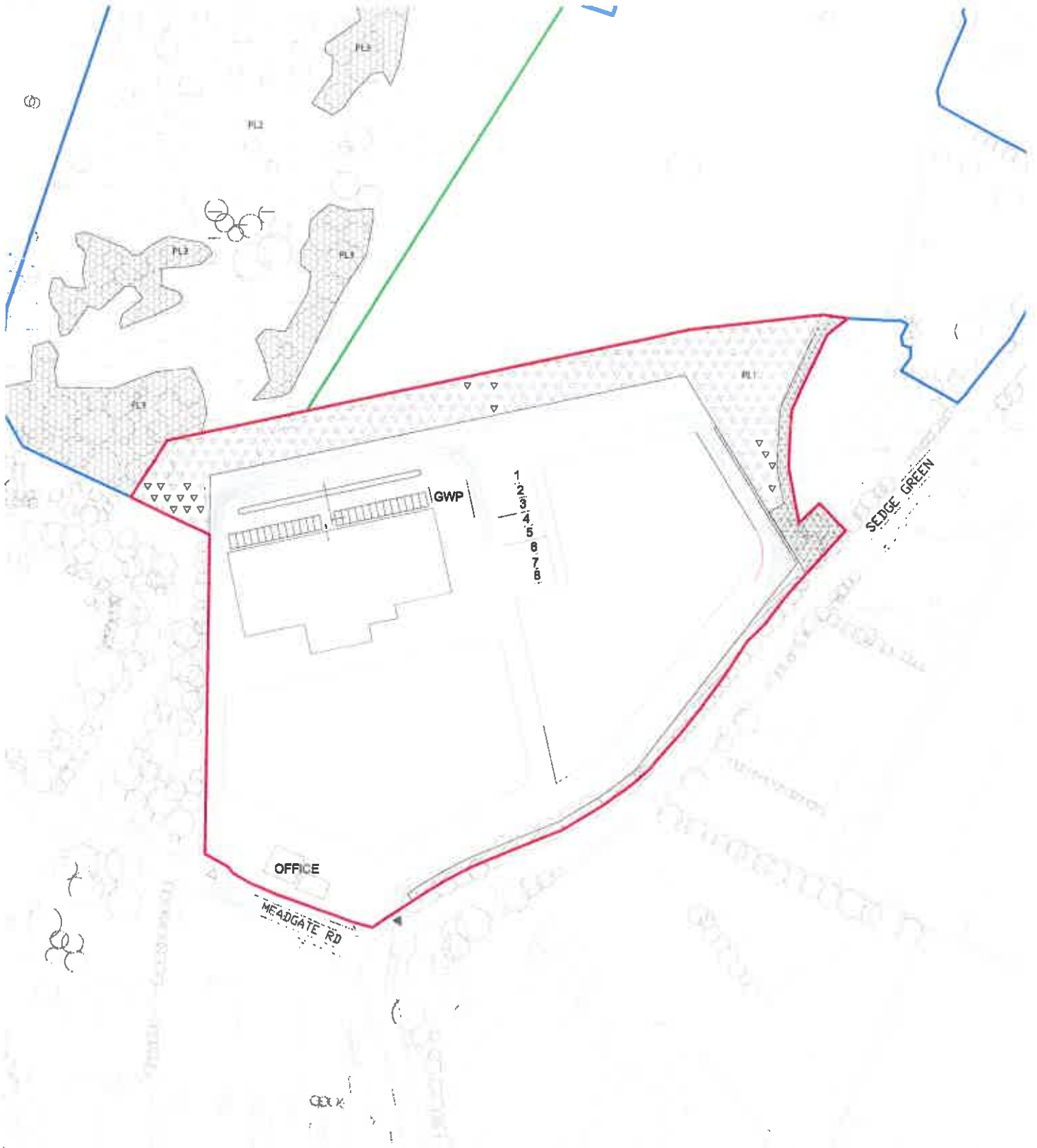
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-  Application Site
-  Existing Operational Site
-  Lignacite Ltd Wider Ownership
-  Park Boundary
-  Lee Valley Pathway St Paul's F
-  Proposed pedestrian/cycle route
-  Proposed pedestrian/cycle route

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LEGEND

- | | | | |
|--|--|---|-------------------------------------|
|  | Application Site Boundary |  | PL1 - Mixed Native Scrub planting |
|  | Ligneco Ltd Wider Ownership Boundary |  | PL2 - Scrub & wildflower mix |
|  | Wider Ownership BNG Area
<small>(From 2024 and not development)</small> |  | PL3 - Enhanced mixed scrub planting |
|  | Area Allocated for Temporary Block Storage |  | Enhanced existing buffer hedgerow |
|  | Site Vehicular Access |  | Existing hedge to be retained |
|  | Site Vehicular Exit |  | Proposed tree |
|  | Existing Trees
<small>(From 2024)</small> | | |

Meadgate Works, Nazeing

DRAW TITLE: Operational Site Plan
 DRAW NO: DWG13
 JOB NO: 448016



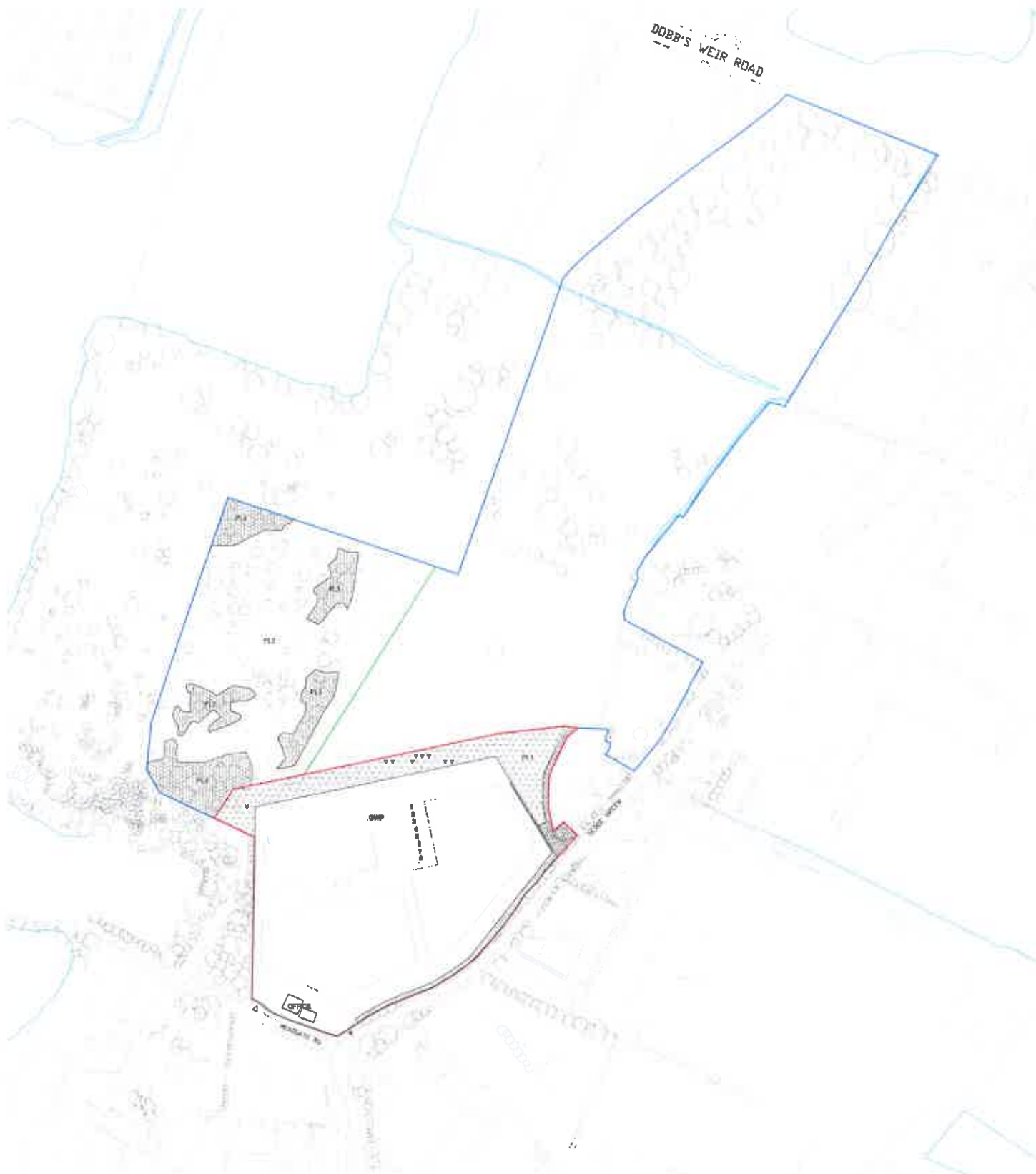
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LEGEND	
	Application Site Boundary
	Lignetta Ltd Wider Ownership Boundary
	Wider Ownership BNG Area <small>Source: ECN3: 001 P000000000000</small>
	Area Allocated for Temporary Block Storage
	Site Vehicular Access
	Site Vehicular Belt
	Existing Trees <small>Source: SP0100</small>
	PL1 - Mixed Native Scrub planting
	PL2 - Scrub & willow mix
	PL3 - Enhanced mixed scrub planting
	Enhanced existing buffer hedgerow
	Existing hedge to be retained
	Proposed trees

Meadgate Works, Nazling

DRAW TITLE: Proposed Site Plan
DRAW NO: DWG11
JOB NO: 448016



Drawn By: ML
Date: 13/03/24
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Checked by: -
Rev: -





**PLANNING CONSULTATION BY EPPING FOREST DISTRICT
COUNCIL**

**PROPOSED 49.99MW GAS FIRED ELECTRICITY GENERATING FACILITY
(PEAKING PLANT) WITH ASSOCIATED INFRASTRUCTURE, ACCESS
AND LANDSCAPING (REVISED SCHEME TO EPF/0800/20), REF:
EPF/1419/24**

AT POPLAR FARM (WEST SITE), HAMLETT HILL, ROYDON, CM19 5JY

Presented by Head of Planning

SUMMARY

This is a full application for the construction of a 49.99 MW gas fired electricity generating facility (Peaking Plant) on farmland outside the Regional Park, within the Green Belt accessed off Hamlet Hill, Roydon. The applicant argues that there will be a national need for the type of infrastructure proposed, to support flexible energy generation and the move to renewable energy. The proposed energy plant will have the ability to burn hydrogen as well as natural gas from the first day of operation.

Although the proposed development is located approximately 400m to the east of the Park boundary along Sedge Green Road and is positioned to the east of a large area of commercial glasshouses there are concerns that the proposed development could have impacts upon the environment of the Regional Park. This is due to its location within the adjoining Green Belt that frames the Park, and the potential associated impacts on visual amenity, as well as impacts on wildlife in general and from light pollution during construction and operation.

A holding objection is therefore recommended to enable further information to be provided by the applicant on these points; in particular to produce further viewpoint analysis to enable an assessment of whether the proposal could be visible from elsewhere within the Park and whether that would impact upon the visual amenity of visitors and to complete further ecological surveys in respect of protected species to enable a full ecological consideration of the proposal.

RECOMMENDATIONS

- Members Approve:
- (1) that Epping Forest District Council be informed that the Authority places a holding objection on the application for 49.99MW gas fired electricity generating facility (Peaking Plant) at Poplar Farm (west site), Hamlett Hill, Roydon, in order to enable:
 - a) further viewpoints to be commissioned from within the Regional Park at Nazeing and Dobbs Weir as part of the Visual Impact Assessment in order to assess the extent to which the proposed development is likely to be visible from within the Park and whether that would impact upon the landscape character and visual amenity of visitors to the Park;
 - b) ecological surveys in respect of European Protected Species (Great Crested Newts and Bats) and Protected species (reptiles and breeding birds) to be undertaken as recommended by the Preliminary Ecological Assessment in order to provide sufficient information to assess the proposed development for biodiversity impacts, which should be a material consideration in this case; and
 - (2) that the Epping Forest District Council be informed that the Authority would wish to see the detail and be consulted on the additional information provided in relation to the above matters prior to any grant of consent.

DESCRIPTION OF SITE

- 1 Detailed planning consent is sought for a 49.99MW gas fired electricity generating facility (Peaking Plant) on farmland outside the Regional Park, off Hamlet Hill. The application site is separated from the Regional Park by an area of large commercial glasshouses that border Sedge Green Road within Roydon. It is proposed to access the Site from Hamlet Hill 380m to the north through an existing bus depot with an access track passing through four small fields, also currently pasture. Please refer to the location plan at Appendix A and the context plan at Appendix B to this report.
- 2 The application site is in the Green Belt and comprises the majority of a single 7.4 hectare field, currently pasture. The northern extent of the site is defined by a 26m wide wayleave over the underground high pressure gas main. The remaining field to the north is pasture and the land rises to the north with Clay Hill forming a natural screen between the site and land to the north. Electricity generated will be fed to an existing overhead line which crosses an adjacent field to the east and the application site boundary extends to the tower where the point of connection will be made.

- 3 The application site is bounded to the west by a hedgerow beyond which lies the cluster of large commercial glasshouses typically 6m high, occupying the flat valley floor at a similar level to the application site. They extend for 330m as far as Sedge Green Road and screen the site from the road. The road marks the boundary of the Regional Park and is lined with commercial properties. To the south of the application site is a mature hedge and beyond this are further commercial glasshouses. A number of Public Rights of Way (PRoW) pass close to the site most notably PRoW 28 Nazeing which runs alongside the southern boundary, and connects with Sedge Green road via a route through the area of commercial glasshouses.
- 4 A similar scheme was submitted in 2020 for the proposed development of four 12.5MW gas reciprocating engines enclosed in a sound insulated building measuring 1m in height, with four exhaust stacks at 12m in height, ref: EPF/0800/20. This was refused by the Epping Forest District Council (EFDC) on a number of grounds including harm to the Green Belt and wider landscape character of the area, traffic and transport issues and matters relating to health and air quality.

POLICY BACKGROUND

- 5 Paragraph 157 of the National Planning Policy Framework (NPPF) is generally supportive of applications for renewable and low carbon development. In this respect paragraph 162 a) of the NPPF states that development should '*comply with any development plan policies on local requirements for decentralised energy*', and in paragraph 163 b) it states that any approval of development must be based on the development's impact being '*acceptable*'. However when determining planning applications, Local Planning Authorities (LPAs) should not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small scale projects provide a valuable contribution to cutting greenhouse gas emissions, Paragraph 163a).
- 6 The Local Plan has identified the District's development needs over the period 2011 – 2033. The Infrastructure Delivery Plan (IDP) produced as part of the evidence base to support the Local Plan outlines the infrastructure needs over the Local Plan period. The IDP of 2017 and updated in 2020 confirms, following assessment and consultation with relevant providers, that there are no planned energy reinforcement works in Epping Forest District to support the forecast population growth. Comments made by the Epping Forest District Council (EFDC) Policy Team in respect of this application have also confirmed that based on the available evidence base there is no identified local need to increase the electricity capacity in the District over the emerging Local Plan period.
- 7 However, EFDC declared a Climate Emergency in September 2019 and in July 2023 published a Climate Change Action Plan which supports the Council's ambition to "*do everything within its power to become carbon neutral by 2030*". There is therefore a need locally to transition to low carbon and renewable energy sources. Policy DM20 'Low Carbon and Renewable Energy' in the Local Plan is supportive of this, but only provided that proposed developments do not have an '*adverse impact on the openness of the Green Belt*' and can demonstrate how any impacts on the wider environment and heritage assets "*can be avoided or mitigated through careful consideration of location, scale and design*" (Policy DM20 (i) and (ii)).

- 8 Local Plan Policy DM4 'Green Belt' mirrors national policy as outlined in Section 13 of the NPPF 2023. This policy states that construction of new buildings in the Green Belt is inappropriate development unless the nature of the development meets one of the exceptions to this principle. The proposed development does not qualify as an exception and therefore is inappropriate development.
- 9 Local Plan policy DM3 'Landscape Character, Ancient Landscapes and Geodiversity' seeks to ensure development proposals are "sensitive to their setting in the landscape in particular in settlement edge locations, and to its local distinctiveness and characteristics" and expects proposals to take into account existing landscape features from the outset with careful landscaping of the site and sensitive use of design, layout and materials. Policy DM5 A. 'Green and Blue Infrastructure' states that development proposals must "demonstrate that they have been designed to: (i) retain and where possible enhance existing green and blue infrastructure assets, including trees, hedgerows, woods and meadows, green lanes, wetlands, ponds and watercourses and improve connectivity of habitats;.."
- 10 Policy DM1 'Habitat Protection and Improving Biodiversity' states that all development should seek to deliver net biodiversity gain, integrating biodiversity within the development, and protecting and enhancing natural habitats. It also states that "Development proposals must seek to avoid harm to, protect and enhance natural habitats, species, areas and corridors for biodiversity".
- 11 The Local Plan is recognised as having an important role in terms of the protection, enhancement, development and management of the Lee Valley Regional Park (LVRP) and the public enjoyment of its leisure, ecological, heritage, and sporting resources. The Local Plan 2023 recognises and supports the Regional Park, its vision and remit as a key asset for the District, and as a component of the region's green and blue infrastructure (para 2.23). It also recognises the Park Development Framework (PDF), and its specific proposals for the future use and development of the Regional Park including the importance of improving access into and through the Park for pedestrians and cyclists.
- 12 **Park Development Framework (PDF)**
The PDF Proposals do not apply to land outside the Regional Park. However, the Lee Valley Regional Park Landscape Strategy for Character Area A3 'Glen Faba and Nazeing Meads', the area of Park of most relevance to the application site, does reference the importance of the wide open views across the Park towards the mostly undeveloped skyline to the east. This is considered important and characteristic of the landscape framing the Park in this area and the Strategy Guidelines highlight the need to: "Protect the rural setting of the low rolling farmland on the valley sides to the east, particularly the undeveloped skylines of Clay Hill and Roydon Park, which are vulnerable to development".
- 13 The Authority's Strategic Policies which provide guidance for land use change and development both within and outside the Park state under E2 'Effective Use and Management of Land' – "Development proposed on sites either within or outside the Park which could adversely impact on its amenity will be resisted or planning obligations sought in line with other policies within the Plan."

DESCRIPTION OF DEVELOPMENT

- 14 This is a full planning application to construct a 49.99MW gas fired electricity generating facility (Peaking Plant) connected directly to the National Transmission System (NTS) gas network. Its purpose is to supply back up generation at peak times of demand to UK Power Network (UKPN) customers. The engines installed will have the ability to burn hydrogen as well as natural gas from the first day of operation. The site can turn on and reach full output capacity within 7 minutes and provide a sustained delivery of energy to the grid. The hours of operation will be limited to 2250 hours per year monitored by the Environment Agency.
- 15 The applicant contends that there will be a national need for the type of infrastructure proposed, to support flexible energy generation and the move to renewable energy, i.e. to balance the fluctuating power requirements in the electricity network and operate during periods of high level demand for electricity or shortfalls of electricity supply, particularly as a result of weather determinant renewables.
- 16 The Proposed Development covers a total site area of approximately 6.53 hectares, of which 1.31 hectares will be developed and the remaining set aside for landscaping. Please refer to the Masterplan attached at Appendix C. The components of the development comprises an engine house containing eleven 4.5MW gas engines, each housed in a concrete cell to provide robust noise insulation, 56 x 17m in plan, and 5m high. 4 exhaust flues will protrude from the engine house reaching 12m in height. Each engine block feeds electricity into a small substation which is connected to the existing overhead distribution line via a new point of contact connection tower. There would also be a new below ground gas pipe connection into the existing high-pressure gas main, enclosed within a detached compound. Other equipment near the main engine house includes;
- A 11kv switch room building, (21m x 5m in plan, 4.4m high);
 - An office/welfare building, (918.3 x 9.7m in plan 3.4m high);
 - A fire water tank, (8.5m high, 9.3m in diameter);
 - Two compounds to regulate the gas from the existing gas main (the connection will be an underground pipe), the compounds will occupy an area 30 m x 55m and the equipment will be less than 3m high;
 - A customer substation, 30m x 17m in plan with equipment up to 6m high;
 - An underground connection from the substation to a new tower;
 - Construction of a stone access track from Hamlet Hill to the north;
 - Flood water attenuation; and
 - Extensive landscaping in the form of hedge, woodland planting and open wild flower meadows.
- 17 The facility will be enclosed by new 2.5m high fencing to offer site security and ensure that the equipment is protected from vandalism. Day and night infrared cameras are included which will activate as soon as a person or vehicle moves into monitored space, triggering a 'recorded event' in addition to standard 24/7 recording of the site. These measures are proposed rather than the use of floodlighting in order to minimise potential landscape and visual impacts.
- 18 **Access and Traffic**
The current access off Hamlett Hill will have to be upgraded to ensure safe access for the largest abnormal load vehicles. The construction period is

anticipated to last 18 months, 12 months for civil and 6 months for commissioning. A workforce of up to 50 personnel is required, although this may peak initially at up to 70 personnel during the early ground works phases. A proposed HGV route to and from the site is provided in the Construction Management Plan which routes traffic into the site from the M11 at J 7 and the A414 in the east, through Harlow and Roydon. In operational mode no more than 5 vehicles a week would visit the site.

- 19 The Planning, Design and Access Statement states that the maximum number of outward movements of construction vehicles in any one day will be "circa 30 Heavy Duty Vehicles (HDVs), although this is the peak and will be confined to the early earthworks / civils phase of the project". However, the Construction Traffic Management Plan states that based on the development of a comparable Peaking Plant in Yorkshire the busiest construction period equated to a peak number of 9 HGV's per day with an average of 4 HGV's per day. It is anticipated that many of the non-local workforce will stay at local accommodation and be transported to and from the site by minibus and/or van. The number of car trips to and from the site will therefore be limited primarily to those associated with site management staff and visitors. A temporary car parking area (including spaces for minibuses and vans) will be provided within the on-site contractor's compound. Equipment will be stored in the construction laydown area until it is required within the construction site, however, much of the equipment will arrive pre-assembled and be installed directly on arrival.
- 20 **Landscape and Ecology**
The Proposed Development includes substantial landscaping in the form of woodland and parkland tree planting, as well as 135m of new native hedgerow and open wildflower meadows. New permissive paths are proposed through the new landscaped area to the east of the new energy plant, and will connect into the existing PRow network.
- 21 The application is accompanied by a Preliminary Ecological Assessment (PEA) and a Biodiversity Net Gain assessment. This shows that on site and off site proposals will result in an overall biodiversity net gain in habitats of 287.19% equivalent to 39.97 units. The substantial gain is primarily achieved through grassland enhancement and extensive tree and woodland planting across the site.
- 22 The PEA recommends a number of additional surveys in respect of European Protected Species and Protected Species, including surveys:
- to address the risk to Great Crested Newt, either by the completion of environmental DNA (eDNA) surveys on waterbodies within 500m, to confirm presence/absence (to be undertaken between 15 April and 30 June) or by applying for the works to be undertaken under the NatureSpace District Level Licence (DLL) scheme for great crested newt, a strategic approach devised by Natural England. No further survey effort or timing constraints are associated with this approach;
 - to confirm the presence/absence of reptiles via a seven-visit reptile survey. These should be undertaken in April, May and September although surveys can be undertaken between March and October inclusive under suitable weather conditions;

- for breeding bird assemblages. Whilst the PEA recommends a pre-commencement breeding bird survey is undertaken Essex Place Services who advise EFDC on ecological matters indicate that this survey must be conducted prior to determination if protected bird species are likely to be present and affected by the proposals; and
- to confirm that mature trees on site with suitable features to support roosting bats are not to be removed. If trees are to be removed, a detailed ground level tree inspection will be required to assess any impacted trees and make a recommendation if any bat emergence surveys are required.

23 Air Quality

An Air Quality Assessment has been provided as part of the application. This has assessed the operational-phase, where the most important consideration is stack emissions. This assessment has found that "ground-level nitrogen dioxide (NO₂) concentrations will be within acceptable levels at sensitive receptors and will not give rise to any significant adverse effects based on the criteria in the Environmental Protection UK (EPUK)/Institute Air Quality Management (IAQM) Land-Use Planning & Development Control: Planning For Air Quality guidance." The assessment concludes that the proposed development does not, in air quality terms, conflict with national or local policies and that there are no constraints to the development in the context of air quality.

24 Visual Impact

The Landscaping and Visual Impact Assessment (LVIA) submitted with the application has considered the visual impacts of the development including those associated with pluming from the flues. In general it has found that the proposed development will result in a very limited reduction in the "openness" of the Green Belt and that "views of it will largely be confined to the field in which it lies, where it will be seen with the backdrop of existing glasshouses." It concludes that "the proposed development (apart from the point of connection mast) would be entirely screened by a combination of the existing glasshouses, existing topography, existing tree and hedge cover, new land form and woodland planting and so would not be 'conspicuous within the wider Green Belt'."

- 25 It is understood that the flue exhaust from the facility proposed will not form a plume due to the velocity and high temperature of the gases which means the water vapour cannot condense as a cloud. The gas engines are designed to fire up and run at full power within a few minutes (a requirement to meet their peak demand function). The high exhaust velocity pushes the gases to height, at which stage vapour may form, but the gases will have dispersed and will not appear as a plume.

PLANNING APPRAISAL

26 Impacts upon the Regional Park

The proposed development would be located approximately 400m to the east of the Regional Park boundary which runs along Sedge Green Road. It is also positioned to the east of the large area of commercial glasshouses and is contained within an open agricultural field. Please refer to the context plan at Appendix B. Nonetheless there are concerns that the proposals could have indirect impacts upon the environment of the Regional Park due to its location within the green belt that frames the Park, and associated impacts on visual

amenity, increased traffic on local roads, particularly during construction, and impacts on wildlife in general and from light pollution during construction and operation.

27 Green Belt

The application site is situated within the Green Belt but outside the Regional Park. In terms of its Green Belt location, the proposal represents inappropriate development, which is by definition, harmful, and given its industrial nature and scale will also result in substantial material harm to its openness, both in visual and spatial terms. It must therefore be considered under exceptional circumstance. The previous and very similar application made in 2020 was refused on Green Belt grounds by the Council. The Policy comments provided by officers from EFDC regarding the current proposal have come to a similar conclusion in that the development is contrary to Local Plan policies DM20 and DM4 and conflicts with the NPPF in regard to policy on openness of the Green Belt and its role in safeguarding the countryside from encroachment (para 143 c)).

28 EFDC policy advice also notes that whilst the proposed scheme is not one which utilises renewable energy, “there is no policy requirement for the applicant to propose such a scheme for the site. The proposed development does produce lower carbon energy vs. traditional methods of energy production and can provide electricity quickly and flexibly to the grid, providing resilience and energy security” which can be considered positive benefits of the proposed scheme. A case has also been made by the applicant that the scheme should be supported due to national need and the specific functional requirement to be near a high pressure gas main and suitable electrical grid connection. The weight attributed to these various factors will be a matter for the Council to consider.

29 In terms of the Regional Park the area of Green Belt in question is located some distance from the Park but its openness does make a contribution to the character and landscape that is evident in views out from the main body of Park at Nazeing Mead Lagoons and from Meadgate Road for example, which is identified by the Lee Valley Regional Park Landscape Strategy Guidelines as an important feature framing the Park in this area. The existing glasshouses shield the impact of the energy plant to some extent from views out from the Park but there is an issue of the cumulative impact and further erosion of greenbelt openness. It would be helpful to understand whether the proposed development would impact upon the openness and rural setting of the Park and this requires an assessment of views and visual impact.

30 Landscape and Visual Impacts

The proposed development will substantially change the character of the field in which it lies from farmland to an industrial facility. The Landscaping and Visual Impact Assessment (LVIA) submitted with the application states this “would result in a Major adverse effect on the landscape character of this part of the Site”. However, it also finds that the remaining part of the field, around 75%, will be landscaped as parkland with species rich grassland and permissive public access which would have a Moderate beneficial effect on the landscape character and quality of 75% of the application site. It is also proposed that the access track will be built at grade and will be allowed to green over naturally. It will have the appearance of an agricultural track through farmland.

31 In terms of the effect of the proposed development on the character of the wider

landscape, and in particular the Regional Park, the industrial element will largely be hidden from the surrounding area by a combination of the existing glasshouses, existing tree and hedge cover and existing and proposed topography. It is likely however that the four 12m exhaust flues and the new mast connecting to the existing overhead line will be visible from within the Park. How prominent these elements would appear when viewed from within the Park at some distance from the application site and in the context of the intervening glasshouses and existing overhead transmission line and pylon is difficult to judge without a visual assessment.

- 32 The Landscape and Visual Impact Assessment states that the Sedge Green, Dobbs Weir Road area, lower Nazeing and Nazeing were all visited to assess the visual impacts of the proposal but “it was apparent that there would be no views of the proposed development due to a combination of topography, tree and buildings”. These viewpoints have therefore been discounted. This makes it difficult to judge whether the proposal could be visible from elsewhere within the Park and whether that would impact upon visitors. Further viewpoints should be commissioned from within the Park to provide the evidence to substantiate this point.

33 Traffic Impacts

There is a concern that the proposed development could have an indirect impact upon the environment of the Regional Park due to increased traffic using local roads which border or pass through the Park such as Sedge Green and Dobbs Weir Road, particularly during construction when there is likely to be a regular and high number of movements of construction vehicles per day. The submitted Construction Traffic Management Plan proposes an HGV route which directs traffic away from the Park using a route into the site from the east via the M11, the A414 through Harlow and then onto local roads through Roydon. The applicant has also committed to provide a before and after condition survey of the highway network together with remedial action as deemed necessary. Essex County Council Highway Authority have provided a response to the application and are satisfied with the details provided in the Construction Traffic Management Plan and that in terms of safety and capacity the impact of the proposed development, once implemented and running, will generate minimal traffic per day.

- 34 It is unlikely therefore that in operational mode the proposed development will have any impact upon the Park and local roads used to access the Park. Likewise during construction the proposed HGV route will ensure lorry traffic is directed away from the Park. This proposed route would need to be agreed with the Council and an effective means of monitoring its use put in place prior to commencement of any construction.

35 Impacts on Wildlife

It is important that a full assessment is provided of wildlife and habitats on site to ensure impacts can be avoided and mitigated where necessary and to ensure there is sufficient ecological information available for the determination of the application. This is particularly relevant given a number of statutory and non-statutorily designated sites of ecological importance lie within the Park a short distance from the application site, including Rye Meads Site of Special Scientific Interest (SSSI) 1.9km to the north west, and Local Wildlife Sites within the Nazeing area – Lee Valley North (0.3km to the north) and Lee Valley Central (1km to the west). The additional surveys recommended by the PEA in respect of European Protected Species (Great Crested Newts and Bats) and Protected

species (reptiles and breeding birds) should be undertaken prior to consideration of the application. The Authority should be consulted on these to ensure a meaningful assessment has been made of any impacts in relation to the wider ecology of the Park.

36 Lighting

It is noted that the facility will be manned 24/7 with permanent operational lighting confined to the office and some motion activated lighting for security and maintenance purposes. Site security will be afforded by fencing and CCTV (including infrared CCTV), rather than through the use of floodlighting in order to minimise potential landscape and visual impacts. This will reduce the likelihood of light pollution within the Park particularly given the intervening glasshouses that shield the main built elements from the Park edge.

- 37 The PEA also recommended that light pollution from any lighting should be minimised both during and after the construction phase. A sensitive lighting scheme should therefore be provided and secured through a planning condition to allow for suitable roosting and foraging areas for bats within the site and ensure impacts on other nocturnal wildlife is minimised.

38 Conclusion

The proposed development is located outside the Regional Park but within an area of Green Belt that contributes to the largely rural setting and the open landscape character that frames the Park in this area. The Authority's Landscape Strategy Guidelines for the Regional Park consider it important to protect these qualities and the wide open views out to the low rolling farmland on the valley sides to the east. It is unclear whether the proposed development will impact upon this rural setting to the Regional Park and views out to the east because viewpoints from within the Park at Road Dobbs Weir Road area, lower Nazeing and Nazeing were all discounted early in the assessment process and no evidence is provided for consideration by officers as part of the planning application. This makes it difficult to reach a conclusion as to whether the proposal could be visible from elsewhere within the Park and whether that would impact upon visitors. Further viewpoints should be commissioned from within the Park to provide the evidence to substantiate this point.

- 39 Officers are also of the view that the ecological surveys recommended by the PEA should be provided prior to determination of the application so that a full assessment can be made of any ecological impacts and any associated mitigation as required. A holding objection is therefore recommended to allow the applicant to address the points raised above.

ENVIRONMENTAL IMPLICATIONS

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

FINANCIAL IMPLICATIONS

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

LEGAL IMPLICATIONS

- 42 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.

- 43 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

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

EQUALITY IMPLICATIONS

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

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BACKGROUND REPORTS

Application Papers 24.065

July 2024

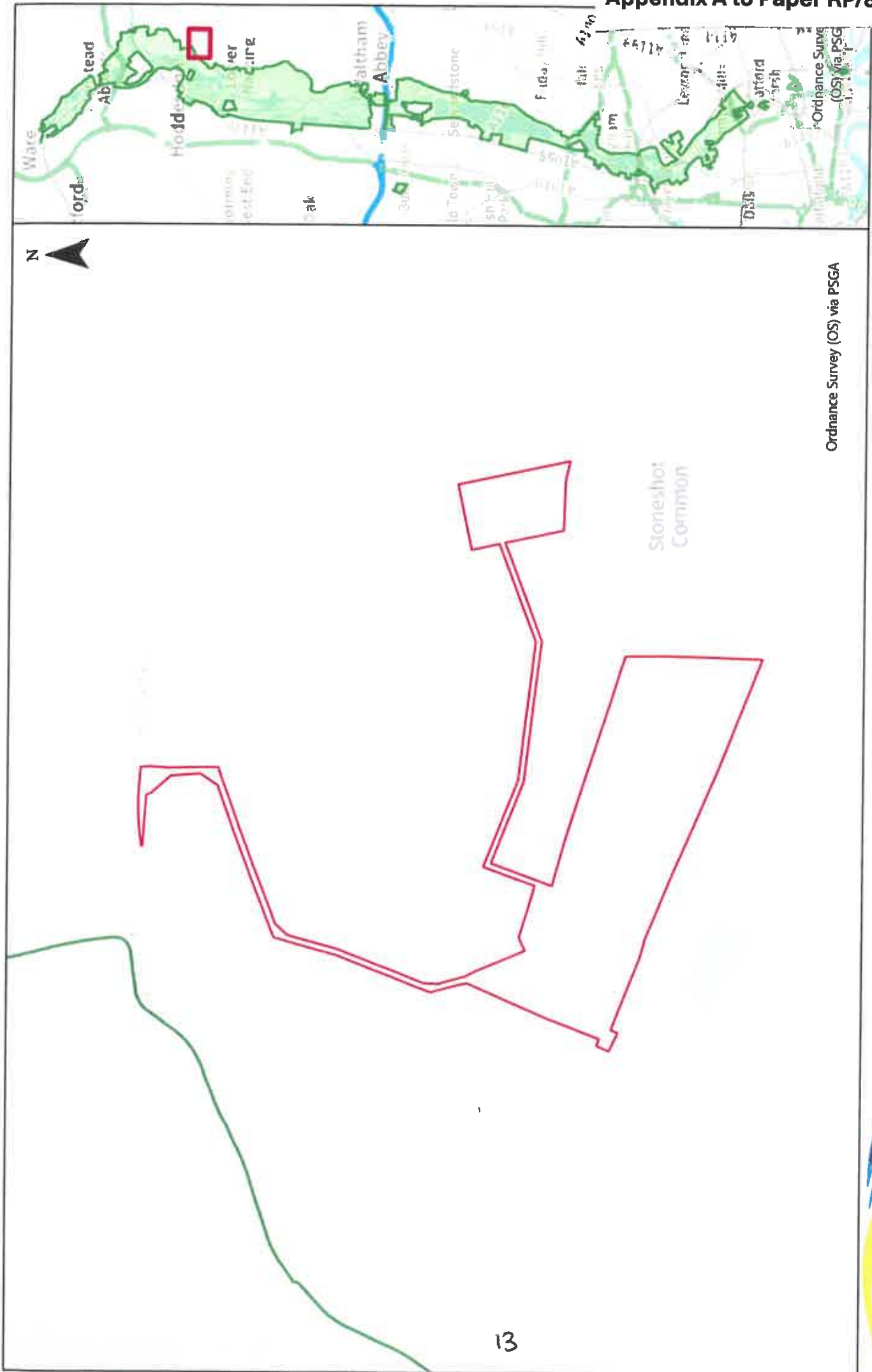
APPENDICES ATTACHED

Appendix A	Location Plan of the application site
Appendix B	Context Site Plan
Appendix C	Masterplan

LIST OF ABBREVIATIONS

EFDC	Epping Forest District Council
LVRPA	Lee Valley Regional Park Authority
PDF	Park Development Framework
PRoW	Public Right of Way
NPPF	National Planning Policy Framework
NTS	National Transmission System
PEA	Preliminary Ecological Assessment
LPA	Local Planning Authority
UKPN	UK Power Networks
HDV	Heavy Duty Vehicle
eDNA	Environmental DNA
DLL	District Level Licence
EPUK	Environmental Protection UK
IAQM	Institute Air Quality Management
SSSI	Site of Special Scientific Importance



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Ordnance Survey (OS) via PSGA

Location plan - Proposed gas fired electricity facility, Hamlett Hill, Roydon

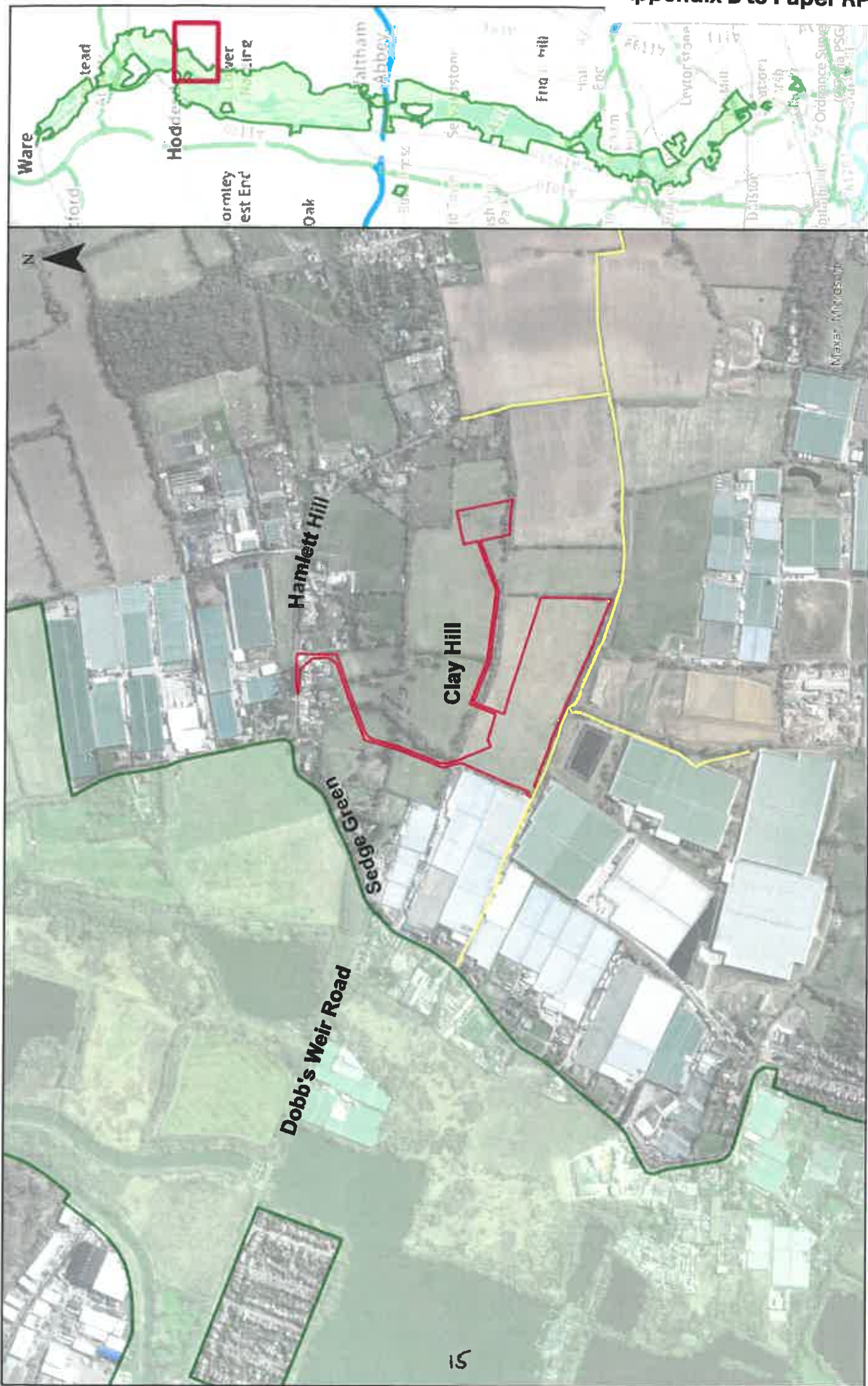
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03/09/2024

Site Boundary  Park Boundary 

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Context plan - Proposed gas fired electricity facility, Hamlett Hill, Roydon

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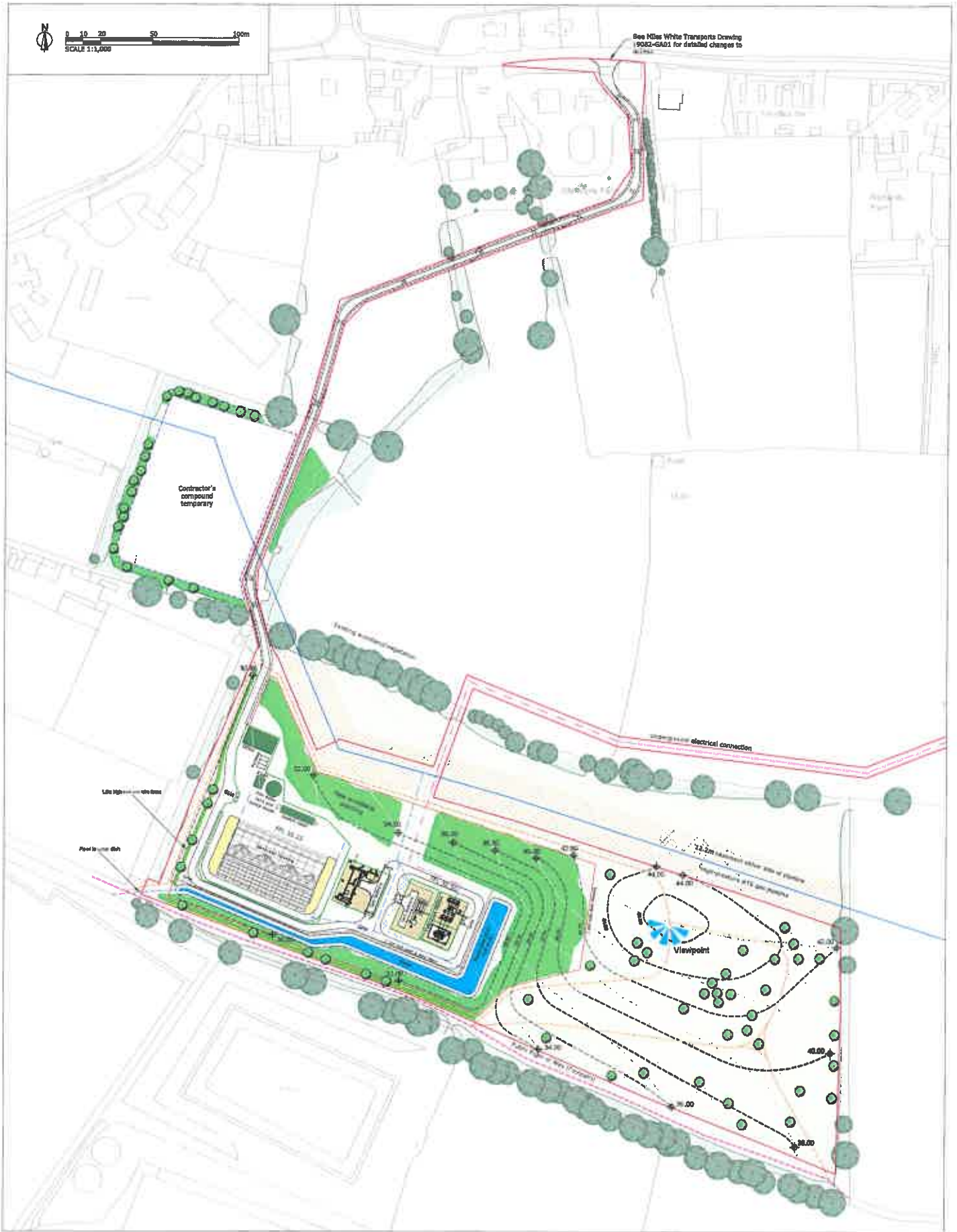
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- Site Boundary
- Public Right of Way
- Park Boundary

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	<p>Key</p> <ul style="list-style-type: none"> Site boundary Alarm water interlocker Proposed landscape planting New tree planting New landscape planting Existing vegetation/retains Viewpoint W800mm grass 		<ul style="list-style-type: none"> Proposed compacted stone sub-base access Security fencing 1.8m high door fence 1.8m high post & rail fence Unconformably high resistance striping Contractor's compound Proposed concrete 40-100 Existing concrete 40-100 		<ul style="list-style-type: none"> Surface water drainage Underground electrical connection New underground gas connection Existing underground gas services Existing Public Right of Way 13.2m wide gas easement Indicative permeable paving within gas easements through access to all areas within 10m radius Additional width to 60m for construction 		<p>ON BEHALF Statera</p>	<p>PROJECT EPD Housing West Hamstead Hill, Reading, Reading, Texas</p>
	<p>DATE: 17/08/2023</p> <p>SCALE: 1:1000 @ A1</p> <p>DWG NO: 17</p> <p>APPROVED: [Signature]</p>		<p>DATE: 17/08/2023</p> <p>SCALE: 1:1000 @ A1</p> <p>DWG NO: 17</p> <p>APPROVED: [Signature]</p>		<p>DATE: 17/08/2023</p> <p>SCALE: 1:1000 @ A1</p> <p>DWG NO: 17</p> <p>APPROVED: [Signature]</p>		<p>DATE: 17/08/2023</p> <p>SCALE: 1:1000 @ A1</p> <p>DWG NO: 17</p> <p>APPROVED: [Signature]</p>	<p>TITLE Housing West Hamstead Hill Block Plan</p>

