

Sara Chiong

From: Martin, Claire <[REDACTED]>
Sent: 20 September 2024 11:26
To: Local Plan; Ellie Kuper Thomas
Cc: [REDACTED]
Subject: LVRPA Representations to the Newham Draft Submission Local Plan Reg 19
Attachments: LVRPA Part A&B Response_form__Policy BFN1.5.docx; LVRPA Part B Response_form__LVRPA BFN1.6.docx; LVRPA Part B Response_form__LVRPA MOL change.docx; LVRPA Part B Response_form__LVRPA GWS3 Biodiversity.docx; LVRPA Part B Response_form__LVRPA GWS1 and 2 Greenspaces and water spaces.docx; LVRPA Part B Response_form__LVRPA N8 Stratford & Maryland.docx; LVRPA Part B Response_form__LVRPA N4 Canning Town.docx; LVRPA Part B Response_form__LVRPA N7 Three Mills.docx; LVRPA Part B Response_form__LVRPA Tall Buildings.docx; LVRPA Part B Response_form__LVRPA SI3 Culture Facilities Sport & Recreation.docx; LVRPA consultee response & representations to LB Newham Draft Submission Local Plan Regulation 19 Consultation 190924.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Dear Ellie and Planning Policy Team

Please find attached the Lee Valley Regional Park Authority's representations to the draft Submission Local Plan. These are set out in the letter attached and were agreed by Members of the Authority's Regeneration and Planning committee yesterday. The matters raised in the letter have been copied across into ten separate representation forms.

I would welcome acknowledgement of safe receipt.

Many thanks

Kind regards
Claire

Disclaimer

Lee Valley Regional Park Authority E-mail Disclaimer.... This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you are not the intended recipient, the use of the information by disclosure, copying or distribution is prohibited and may be unlawful. If you have received this email in error please notify the systems manager at postmaster@leevalleypark.org.uk. The email should then be deleted. The views expressed in this message are personal and not necessarily those of Lee Valley Regional Park Authority unless explicitly stated.

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Ellie Kuper Thomas
Planning Policy Manager
London Borough of Newham
Newham Dockside
London,
E16 2QU

Email: [REDACTED]
Direct Dial: [REDACTED]

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~~ 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), Twelvetreets 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 ~~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 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;**

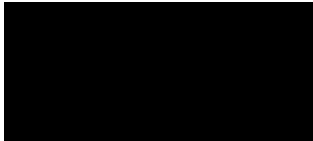
N4 Canning Town

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

Response Form for Regulation 19 Consultation.

	<p>Local Plan Publication Stage Response Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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**Name of the Local Plan to which this representation
relates:**

Newham Draft Submission
Local Plan

Privacy Notice

Who we are

London Borough of Newham (LBN) is registered with the Information Commissioner's Office (ICO) as a 'Data Controller' This privacy notice applies to you ('the service user') and LBN ('the Council'). The Council takes the privacy of your information very seriously.

This privacy notice relates to our functions relating to the Newham Local Plan Review Consultation (Regulation 19). It also provides additional information that specifically relates to this particular consultation, and should be read together with our [general privacy notice](#), which provides further detail.

What data do we collect and process

We collect your name, contact details, email address, job title and organisation if applicable and demographic equalities data if you choose to share it.

Why we collect your data

The consultation is a requirement of the Town and Country Planning (Local Planning) (England) Regulations 2012. We collect your data so that we can get your views on the legal compliance or soundness of the Local Plan, as well as its compliance with the duty to co-operate.

The lawful basis for processing your data

The lawful basis we use to process your data as set out in UK data protection legislation is:

Article 6 (a) Consent: the individual has given clear consent for us to process their personal data for a specific purpose.

Article 9 (a) Explicit Consent: the data subject has given explicit consent to the processing of those personal data for one or more specified purposes.

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

You can withdraw your consent at any time.

How we use your data

This data is collected, collated and then submitted to the Secretary of State, who will appoint an Inspector to conduct an independent examination of the Local Plan. Demographic data will be processed anonymously to assess the effectiveness of our consultation.

Where you have consented, your contact details will be added to our consultation database for future consultations and updates on the Examination in Public.

At submission representations will be made public on the council's website, including name of person and organisation if applicable making representation. Other personal information will remain confidential.

Representations, in full, submitted along with the Local Plan, evidence base and documents Submission Draft Newham required by legislation to the Planning Inspectorate and to the person the Secretary of State appoints as the Planning Inspector. Contact details will be made available to the Inspector and Programme Officer so they can contact individuals to participate in the Examination.

Consultation database is stored on Mailchimp and accessed by planning policy team only. Mailchimp stores names and email addresses of those on the consultation database in line with Mailchimp policies, particularly its [data processing addendum](#). Please be aware they may store personal data external to the UK specifically in the USA and/or EU.

Who we will share your data with

We will only share your data with the Planning Inspector appointed by the Secretary of State, the Programme Officer appointed by Newham, and within the planning policy team. Your name and organisation (if applicable) will be published on our website along with representations upon submission. Demographic data is not shared with the Planning Inspector or the Programme Officer.

We will not share your personal information with any other third parties unless you have specifically asked us to, or if we have a legal obligation to do so.

How long we will keep your data

We will keep your data safe and secure for a period of 15 year(s) in line with our retention Schedule. After this time, it will be securely destroyed.

How do we protect your data

We comply with all laws concerning the protection of personal information and have security measures in place to reduce the risk of theft, loss, destruction, misuse or inappropriate disclosure of information. Staff access to information is provided on a need-to-know basis and we have access controls in place to help with this.

See the [Planning Inspectorate Customer Privacy Notice](#) for details on how they keep your data safe and secure.

Know your rights

We process your data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Find out about your rights at [Your rights – Processing personal data privacy notice – Newham Council](#) or at <https://ico.org.uk/your-data-matters/> If you have any queries or concerns relating to data protection matters, please email: dpo@newham.gov.uk

Response Form

For guidance on how to complete this representation form please view the Regulation 19 Consultation Guidance <https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh>.

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*	2. Agent's Details (if applicable)	
<i>*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.</i>		
Title	Ms	
First Name		
Last Name	Martin	
Job Title (where relevant)	Head of Planning	
Organisation (where relevant)	Lee Valley Regional Park Authority	
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
E-mail Address (where relevant)		

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)

Policy

Implementation Text

Paragraph

Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☐

No

☐

4.(2) Sound

Yes

☐

No

☒

4 (3) Complies with the
Duty to co-operate

Yes

☐

No

☐

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Lee Valley Regional Park Authority (the Authority), in its previous responses to the consultation stages on the Local Plan had 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.

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 (PDF) 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 Lee Valley Regional Park Act 1966 (the Park Act) and this addition is supported.

However in order to ensure the Local Plan can be considered sound it is important that the policy text under BFN1.5h 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 under BFN1.5 h 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 amendment is therefore needed to the wording of policy text under 1.5h.

The new additional text added to the Justification and Implementation Sections (paras 3.9 and BFN1.5 respectively) is also noted and supported. Further amendments to the Justification text are 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.

Finally the Authority supports the addition of a reference to the Regional Park within the site profiles identified below under the category Natural Environment Designation.

N4.SA4 Limmo

N4.SA5 Canning Town Riverside

N7.SA1 Abbey Mills

N7.SA2 Twelvetreepark and Former Bromley By Bow Gasworks

N7.SA3 Sugar House Island

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

As stated above reference to the ‘vision of the PDF’ as set out under BFN1.5 h is confusing as it is not clear to what this refers. The Area 1 Proposals represent the ‘plan of proposals for the future management and development of the Regional Park’, (in this case within the London Borough of Newham) 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

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~~ 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...

Further amendments to the Justification text are 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. New text is shown in blue italics.

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.

Further additional wording is proposed under the Implementation Section BFN5.1 to ensure the link back to the PDF Area Proposals is clear in relation to planning applications.

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.*

continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☒

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To provide any additional information that may be required in relation to the Lee Valley Regional Park and the Park Act.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified about:

a. the submission of the local plan for independent examination

Yes ☒ No ☐

b. the publication of the Inspector's report

Yes ☒ No ☐

c. the adoption of the Local Plan

Yes ☒ No ☐


10. Would you like to be added to our consultation database to be notified about future planning policy consultations?

Yes ☒ No ☐

Please return to London Borough of Newham by 5pm 20th September 2024

Response Form for Regulation 19 Consultation.

Part B

	Local Plan Publication Stage Response Form	Ref: (For official use only)
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Newham Draft Submission
Local Plan

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Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part B – Please use a separate sheet for each representation

Name or Organisation: Lee Valley Regional Park Authority

3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)

Policy	
Implementation Text	GWS1b
Paragraph	
Policies Map	MOL and Sports Facilities in Green Space designations

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

X

No

4.(2) Sound

Yes

X

No

4 (3) Complies with the
Duty to co-operate

Yes

No

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Metropolitan Open Land

The Authority notes and supports the removal of the Lee Valley 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, (reference to the Newham MOL and Green Belt Review (2024) Appendix A MOL Site Assessments MOL Area 32)

The remainder of the Lee Valley 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 Lee Valley VeloPark area would require the open character of the area to be maintained. The Implementation text associated with GWS1b is helpful.

“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.”

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☐

Yes, I wish to participate in hearing session(s)

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9. Do you wish to be notified about:

a. the submission of the local plan for independent examination

Yes ☒ No ☐

b. the publication of the Inspector's report

Yes ☒ No ☐

c. the adoption of the Local Plan

Yes ☒ No ☐


10. Would you like to be added to our consultation database to be notified about future planning policy consultations?

Yes ☒ No ☐

Please return to London Borough of Newham by 5pm 6th September 2024

Response Form for Regulation 19 Consultation.

Part B

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Local Plan

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Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part B – Please use a separate sheet for each representation

Name or Organisation: Lee Valley Regional Park Authority

3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)

Policy	BFN1.6
Implementation Text	
Paragraph	
Policies Map	

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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Connectivity along Water Spaces

Through its consultee responses to the various stages of the draft Local Plan the Authority has 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 projects was well advanced and it was therefore considered appropriate that this should be reflected in the Local Plan. 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.

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 and this is welcomed.

The Authority **supports Policy BFN1.6** which specifically mentions the need for bridges across the River Lea; as set out below. 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.

“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.”

(Continue on a separate sheet /expand box if necessary)

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No, I do not wish to participate in hearing session(s)

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Yes, I wish to participate in hearing session(s)

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9. Do you wish to be notified about:

a. the submission of the local plan for independent examination

Yes ☒ No ☐

b. the publication of the Inspector's report

Yes ☒ No ☐

c. the adoption of the Local Plan

Yes ☒ No ☐


10. Would you like to be added to our consultation database to be notified about future planning policy consultations?

Yes ☒ No ☐

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Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)

Policy	<input type="text" value="GWS1 and GWS2"/>
Implementation Text	<input type="text"/>
Paragraph	<input type="text"/>
Policies Map	<input type="text"/>

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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The Authority maintains its support for Policies on Green Space GWS1, and Water Space GWS2 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 as set out below. 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.

Policy GWS2.2 a. and e. as follows:

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:

- 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

and under Policy GWS2 3b

3. Applications for water-related or water-dependent facilities on or adjacent to water spaces will be supported where:

- b. it can be demonstrated that the activation of the water space is 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.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☐

Yes, I wish to participate in hearing session(s)

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9. Do you wish to be notified about:

a. the submission of the local plan for independent examination

Yes ☒ No ☐

b. the publication of the Inspector's report

Yes ☒ No ☐

c. the adoption of the Local Plan

Yes ☒ No ☐


10. Would you like to be added to our consultation database to be notified about future planning policy consultations?

Yes ☒ No ☐

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Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)

Policy	<input type="text" value="GWS3"/>
Implementation Text	<input type="text"/>
Paragraph	<input type="text" value="Evidence Base list"/>
Policies Map	<input type="text"/>

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

X

No

4.(2) Sound

Yes

X

No

4 (3) Complies with the
Duty to co-operate

Yes

No

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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The Authority maintains its support for policy GWS3 Biodiversity Urban Greening and Access to Nature. This should, together with the strengthening of policy GWS2 which requires applications and development affecting and/or adjacent to water space to appropriately balance the need to activate water spaces with other considerations such as biodiversity and accessibility, help to protect the biodiversity of the water spaces within the Regional Park in Newham.

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.

(Continue on a separate sheet /expand box if necessary)

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One minor addition is required under Policy GWS3. 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.

(Continue on a separate sheet /expand box if necessary)

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☒

No, I do not wish to participate in hearing session(s)

☐

Yes, I wish to participate in hearing session(s)

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Yes ☒ No ☐

b. the publication of the Inspector's report

Yes ☒ No ☐

c. the adoption of the Local Plan

Yes ☒ No ☐


10. Would you like to be added to our consultation database to be notified about future planning policy consultations?

Yes ☒ No ☐

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Name or Organisation:

3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)

Policy

Implementation Text

Paragraph

Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

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N4 Canning Town

The Authority supports the additional wording added to the Canning Town Profile paragraph 4.17 which adds a reference to the Regional Park and 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.**”

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☐

Yes, I wish to participate in hearing session(s)

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9. Do you wish to be notified about:

a. the submission of the local plan for independent examination

Yes ☒ No ☐

b. the publication of the Inspector's report

Yes ☒ No ☐

c. the adoption of the Local Plan

Yes ☒ No ☐


10. Would you like to be added to our consultation database to be notified about future planning policy consultations?

Yes ☒ No ☐

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Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)

Policy

Implementation Text

Paragraph

Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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N7 Three Mills

The Authority supports the additional wording added to the Three Mills Profile under paragraph 4.30 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 Park Development Framework 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;**

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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No, I do not wish to participate in hearing session(s)

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b. the publication of the Inspector's report

Yes ☒ No ☐

c. the adoption of the Local Plan

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Yes ☒ No ☐

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Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)

Policy

Implementation Text

Paragraph

Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

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N8 Stratford and Maryland

The Authority supports the additional wording added to the Stratford and Maryland Profile paragraph 4.34 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;**

(Continue on a separate sheet /expand box if necessary)

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No, I do not wish to participate in hearing session(s)

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Yes, I wish to participate in hearing session(s)

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Yes ☒ No ☐

b. the publication of the Inspector's report

Yes ☒ No ☐

c. the adoption of the Local Plan

Yes ☒ No ☐


10. Would you like to be added to our consultation database to be notified about future planning policy consultations?

Yes ☒ No ☐

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Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)

Policy

Implementation Text

Paragraph

Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy SI3 and Lee Valley VeloPark

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 under paragraph 3.139. 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.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

It is still considered relevant that the Justification text under paragraph 3.139 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 ~~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 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.

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☒

No, I do not wish to participate in hearing session(s)

☐

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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9. Do you wish to be notified about:

a. the submission of the local plan for independent examination

Yes ☒ No ☐

b. the publication of the Inspector's report

Yes ☒ No ☐

c. the adoption of the Local Plan

Yes ☒ No ☐


10. Would you like to be added to our consultation database to be notified about future planning policy consultations?

Yes ☒ No ☐

Please return to London Borough of Newham by 5pm 6th September 2024

Response Form for Regulation 19 Consultation.

Part B

	Local Plan Publication Stage Response Form	Ref: (For official use only)
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Newham Draft Submission
Local Plan

For guidance on how to complete this representation form please view the Regulation 19 Consultation Guidance <https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh>.

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part B – Please use a separate sheet for each representation

Name or Organisation: Lee Valley Regional Park Authority

3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)

Policy D4 Tall Buildings & Table 1 Tall Building Zones

Implementation Text

Paragraph

Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

4.(2) Sound

Yes

☒

No

4 (3) Complies with the
Duty to co-operate

Yes

No

Please tick as appropriate

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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), West Ham Station (TBZ15) and Abbey Mills (TBZ16) and corresponding design principles in the relevant site allocations Abbey Mills (N7.SA1), Twelvetreets 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). In this respect new guidance set out in N7.SA1 Abbey Mills is also supported as follows:

“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.”

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 Authority therefore also supports new guidance set out in N7.SA2 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.”

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.

(Continue on a separate sheet /expand box if necessary)

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