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**Mr Chris Banks
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03 July 2012

Dear Chris Banks

Local Development Framework (LDF): Fish Island Area Action Plan Examination. Further representations by the Lee Valley Regional Park Authority: 635431.

Thank you for your email relating to the Fish Island AAP Examination. I note that the Authority has been listed in the Hearings Programme under 5 sessions covering Issues 1 to 5 and Issue 8.

The Authority had not intended to participate in the oral hearings (as indicated on our representation forms) given that both the written and oral methods carry equal weight, unless the Inspector considers it useful for the Authority to be present.

I attach with this letter a further copy of the Authority's original response; you will note this is no longer a draft letter (as per the version dated 9th February) as the representations submitted were endorsed by the Authority's Lower Lee Valley Planning and Regeneration Committee on the 12 April 2012. As with the draft version the letter covers representations made on both the Development Management Document and the Fish Island Area Action Plan. Two committee plans are also attached; these provide a context for Park's location in relation to Fish Island and Tower Hamlets as a whole, and are relevant to all the Authority's representations.

In relation to Issue 4 and the Hackney Wick Hub, the Authority wishes to make a further point to support its original representation concerning Policy FI 5.1.

The Authority seeks the following amendment to Policy FI 5.1 'Delivering a vibrant hub at Hackney Wick' point 6: (change in bold text)

6. New developments to be well integrated into the Hub and its surroundings, enhancing routes to, from and within the Hub to the wider

Fish Island Hackney Wick area and **to the Lee Valley Regional Park and** future Queen Elizabeth Park.

As previously stated the Hub, with Hackney Wick Station at its heart, has considerable potential to improve public access into the Regional Park by public transport, especially where pedestrian and cycle links between the station and the Park are enhanced and promoted.

Following representations by the Park Authority to the London Borough of Hackney on a similar point regarding the Hackney Wick Area Action Plan the following changes have been made to policy and supporting text in the Submission Document (April 2012), to promote routes and linkages between the Hub and the Regional Park.

Hub Policy 02 states:

Key design elements of the public realm and adjoining development should ensure that:

- a) All streets are designed as high quality safe routes for pedestrians, cyclists and vehicles. The routes linking Victoria Park to the new Olympic Park **and the Lee Valley Regional Park** should stand out as clearly legible pedestrian and cycle routes

Paragraph 6.3 Hub Principles states:

The Hub will be a key focus of activity in the Hackney Wick area. To ensure that this is achievable, the Hub development will be based upon a number of drivers. The Hub will

- Open up the station as a gateway to Hackney Wick, the Lee Navigation and the **Lee Valley Regional Park** and to the legacy facilities that will be available in the Olympic Park.....

As demonstrated in the Authority's original representation a similar reference to the Regional Park under Policy FI 5.1 'Delivering a vibrant hub at Hackney Wick' would improve the soundness of the Fish Island Area Action Plan at this point. It would also support Park Plan 2000 Proposal Waterway Corridor 7f which seeks to improve connections between the Park and public transport nodes such as Hackney Wick station.

Should further information be required on this matter or any of the points raised in the Authority's submission please contact me at cmartin@leevalleypark.org.uk

Yours sincerely

Claire Martin
Policy Officer

Lee Valley Regional Park Authority's Representations Fish Island Area Action Plan Examination



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12 April 2012

Dear Michael

Local Development Framework (LDF): Managing Development – Development Plan Document and Fish Island Area Action Plan, Proposed Submission Versions. Representations made by the Lee Valley Regional Park Authority.

Thank you for consulting the Lee Valley Regional Park Authority on the Managing Development DPD and the Fish Island Area Action Plan (AAP).

The Authority made detailed comments on the previous 'Engagement' versions of both these documents in July 2011. Officers of the Authority have considered how far these comments have been addressed in the Submission documents and the representations set out below focus on those matters outstanding. It is considered that the omissions identified undermine the soundness of the two documents, especially where these relate to requirements set out in the Park Act.

This matter was considered by the Authority's Lower Lee Valley Regeneration and Planning Committee on the 12 April 2012 at which Members approved the following comments as the Authority's formal response to the London Borough of Tower Hamlets.

Tower Hamlets LDF and the statutory duties of the Regional Park Authority

As you are aware the Lee Valley Regional Park Authority is a statutory authority created by the Lee Valley Regional Park Act 1966 (the Park Act). It has a statutory responsibility to either provide directly or work with partners to provide facilities for sport, recreation, leisure, entertainment and nature conservation throughout the 4,000ha of the Park. It has a political membership comprised of councillors drawn from across London, Hertfordshire and Essex, from both Riparian and Non-riparian

authorities, although the majority of our Members are drawn from the riparian boroughs. Councillor Denise Jones represents your council on the Authority.

The Authority is not a planning authority but it has a range of powers and duties in relation to the statutory planning process. Hence the Development Plan documents produced by Tower Hamlets are of particular interest to the Authority.

Sections 14 (subsections 4-7) of the Park Act requires local planning authorities to consult with the Authority on applications for planning permission which they consider could affect the Park. Section 14 (subsections 8-9) allows the Authority to refer the decisions of the riparian authorities to the Secretary of State if it is considered by the Authority that the decision taken materially conflicts with the proposals of the Authority for the development of the Park. The Secretary of State may then call in the application for his/her own determination. The local planning authority must await this determination before any grant of planning permission can be issued (as appropriate).

Section 14 (1) of the Park Act requires the Authority to prepare a plan setting out proposals for the future management and development of the Regional Park. Riparian planning authorities such as the London Borough of Tower Hamlets are under a mandatory obligation to include those parts of the plan affecting their area within their own relevant planning strategies and policies (Section 14(2) (a)) although inclusion does not infer that the planning authority necessarily agrees with them (Section 14 (2) (b)).

For the purposes of section 14 of the Lee Valley Regional Park Act 1966 the Park Plan (Parts 1&2) 2000 (Park Plan 2000), is still the adopted s.14 Plan of the Authority.

The Park Development Framework (PDF) Vision, Strategic Aims and Principles and the Thematic Proposals have been adopted by the Authority as a statement setting out the Park Authority's aspirations for future development and management. The PDF will eventually be supported by a series of area based proposals covering all land within the Park. These area based proposals will in due course amend either in part or in its entirety the Park Plan 2000 for the purposes of s.14. It should be noted that the PDF is consistent with the Park Plan 2000 and our remit. Accordingly both the Park Plan 2000 and the PDF are relevant in terms of Section 14 (2) of the Park Act and are formal statements of the Authority's position in respect of development within the Regional Park. Relevant Park Plan Proposals and Thematic Proposals are included within Appendix A to this letter.

Representations on the Development Management Document

Delivering Open Spaces

There is still no reference to the Regional Park, its statutory remit and proposals (as they relate to Tower Hamlets), within the Managing Development DPD. These documents and the provisions they set out should have formed part of the evidence base for the Development Management DPD and informed the policies relating to open space. This is a statutory requirement that is imposed upon the Council by virtue of section 14 of the Lee Valley Regional Park Act 1966 and without reference to the Authority's Proposals the Development Management DPD is considered unsound.

In assessing the structure of the Managing Development DPD it is considered that a reference to the Park should be included as part of Policy DM10 'Delivering Open

Space'. As previously suggested the following wording would be appropriate as an additional bullet point 3) under DM10:

3. Development should not adversely impact upon the public enjoyment of the Lee Valley Regional Park, its openness, ecological and heritage value. Development which affects the Park will be required to enhance recreational value, water based habitats and pedestrian and cycle routes into and through the Park especially where these aid connectivity between existing and new open spaces.

An additional paragraph (to follow 10.2) should also be included under the 'Delivering Open Space section as follows:

10.2 a) The open spaces, waterways and recreational facilities of the Lee Valley Regional Park form an important part of the borough's green and blue grid networks, and connect the borough with the wider Regional Park which covers an area of 4,000ha between Hertfordshire and North East London adjoining the River Lee. The Park is a valuable resource for the Borough with potential to contribute to creating healthy and liveable communities, particularly where links into this network can be enhanced and complemented by new open space delivered as part of development. The Regional Park Authority has a statutory duty to either provide directly or work with partners to provide facilities for sport, recreation, leisure, entertainment and nature conservation throughout the Park. The Council will support and work with the Lee Valley Regional Park Authority to deliver proposals set out in the Park Plan 2000 and Park Development Framework where they relate to Tower Hamlets.

It may be appropriate to add an explanation of the Park Authority's statutory duty and the provisions of the Park Act as they relate to the Council in Appendix 1 of the Managing Development DPD Glossary of Key Terms.

Water Spaces

Policy DM12 Water Spaces is supported. It recognises the importance of the Blue Ribbon Network and the need to protect its navigability, habitat and water quality. It also seeks to ensure that development provides appropriate setbacks from the water space edges. Water spaces such as the Limehouse Cut, the River Lee Navigation and East India Dock Basin form important elements of the Park within Tower Hamlets and offer opportunities for public recreation, biodiversity and habitat creation, events and learning.

Policy DM12 2 states that "where appropriate development will be required to contribute to the restoration of the water space edge". It is also important that development contributes to the long term management and maintenance of the water space, especially as these form part of the Borough's green infrastructure. A policy reference highlighting the importance of the management of the water space edge should be included as follows:

DM12 2 Development will need to provide appropriate setbacks from water space edges. Where appropriate development will be required to contribute to the restoration **and management** of the water space edge.

Representations on Sites Allocations

Bromley-by-Bow

To improve the soundness of the DPD the Authority is seeking greater clarity relating to the Park boundary. Park Plan and PDF proposals relate to land within the Park, it is therefore important that the Park boundary is clearly defined given the provisions of Section 14 (2) of the Park Act.

The Park boundary should be shown more clearly on Figure 24: 'Place of Bromley-By- Bow'. The statutory boundary runs along the eastern side of the Limehouse Cut until it reaches Three Mill Lane whereupon it crosses over to the western side of the River Lee Navigation. Within Site 6 'Bow Lock' the Park is therefore the 'Green Grid route' as identified on Figure 25. This route continues into the southern half of Site 7 'Bromley-by-Bow North East Quadrant' which again coincides with the Park boundary. North of Three Mills Lane the Park is part of the 'Activated Water space, (Figure 26). Site 7 lies adjacent to an important land holding and visitor attraction within the Park; the Three Mills Conservation Area. Whilst the design principles for the site are largely supported there should be a reference to the Regional Park under the ninth and eleventh bullet points as follows:

"...Specifically any development should:

- Be well-integrated with the Green grid routes to improve access to the local park, the wider Lea River Park **and Lee Valley Regional Park including Three Mills** and further north to Queen Elizabeth Olympic Park.
- Protect, enhance and integrate heritage assets on site, specifically within the Three Mills Conservation Area and in the surrounding areas within the borough, **and the London Borough of Newham and the Lee Valley Regional Park"**

Similarly design principles for Site 6 should be amended, under the third bullet point as follows:

- "The Green Grid route should be linked to the site to improve access to the wider Lea River Park **and Lee Valley Regional Park** and further to the north the Queen Elizabeth Olympic Park."

Leamouth

Site 13 'Leamouth Peninsula' lies adjacent to the Bow Creek Ecology Park and East India Dock Basin, two significant open waterside spaces within the Regional Park. The description of the site and surrounding area should make reference to this fact; both these sites are valuable open space and ecological assets for existing and future residents and visitors to the borough. East India Dock Basin also contains important heritage features and the Park Development Framework Thematic Proposals include a proposal for a heritage facility on this site together with its continued use for volunteer and educational activities.

The design principles (first and second bullets) for Site 13 Leamouth Peninsula should be amended as follows:

- Development should respect and be informed by the riverside character of the site and the surrounding areas of Leamouth, Canning Town, **and the Lee Valley Regional Park at East India Dock Basin** and Bow Creek Ecology Park.

- As a priority, walking and cycling connections should be improved to, from and created within the site. These should be focused on the north-south and east-west routes and include bridges to Canning Town town centre and Bow Creek Ecology Park **and improved links through to East India Dock Basin**

Representations on the Fish Island Area Action Plan

It would be helpful if from the outset the Area Action Plan acknowledged the relationship between Fish Island and the Regional Park. This would assist in satisfying the requirements of the Park Act and improve the soundness of the AAP as the Fish Island area includes parts of the Regional Park; its boundary extends along the towpaths of the Hertford Union Cut, Hackney Cut and River Lea and the Greenway. These form important connections into the main body of the Regional Park and with the other major leisure and open space assets Victoria Park and the Queen Elizabeth Olympic Park.

The section entitled 'The Area Today' could be amended under paragraph 1.36 as follows:

1.36 The Hertford Union and Lea Navigation canals that run through Fish Island, along with the River Lea, help to define the unique waterside character of the area. **The boundary of the Lee Valley Regional Park extends along the towpaths of these canals together with the River Lea and Greenway offering important connections into the main body of the Regional Park and with the other major leisure and open space assets such as Victoria Park and the Queen Elizabeth Olympic Park.** Recent improvements to the towpath network have helped to enhance connections along the waterways however there are currently few bridges, reducing connectivity within Fish Island.

It would also be relevant to identify the Lee Valley Regional Park as an opportunity under Parks and Open Spaces page 20 para 1.47 as follows:

"Fish Island is situated between **three** significant public parks, Victoria Park to the west and **the Lee Valley Regional Park** and future **Queen Elizabeth Olympic Legacy Park** to the east."

The Regional Park boundary should be included on the Key Diagram, it is a statutory designation within Tower Hamlets and forms part of the boroughs green and blue grid networks. Proposals within the Park Plan 2000 are relevant to the Fish Island AAP in particular PW8a and WC 7f and 7g as appended. The statutory requirements of the Park Act and Plan proposals could be referenced under 'How Will the AAP Relate to Other Plans and Policies section (page 6).

Lee Valley Regional Park

The Lee Valley Regional Park Authority is a statutory authority created by the Lee Valley Regional Park Act 1966 (the Park Act). It has a statutory responsibility to either provide directly or work with partners to provide facilities for sport, recreation, leisure, entertainment and nature conservation throughout the 4,000ha of the Park. Part of the Regional Park lies within the borough, including Fish Island. Section 14 (1) of the Park Act requires the Authority to prepare a plan setting out proposals for the future management and development of the Regional Park. Riparian planning authorities such as the London Borough of Tower Hamlets are obliged to include those parts of the plan affecting their area within their own relevant plans although inclusion does not infer that the planning authority necessarily agrees with them.

The Park Plan 2000 is the Authority's current Plan of Proposals and this is now being updated by the Park Development Framework which will eventually be supported by a series of area based proposals covering all land within the Park. These area based proposals will in due course amend either in part or in its entirety the Park Plan 2000 for the purposes of s.14. Proposals in the Park Plan and PDF are relevant to the future of Fish Island.

Better Public Transport and Hackney Wick Hub

The AAP Policy FI 3.6 which sets out actions to improve public transport in Fish Island is welcomed. Policy 3.6 3. *'New Barclays Cycle Hire Docking Stations – extending the TfL Cycle Hire Scheme network to cover Fish Island will offer cycle access to all who use Fish Island'* is strongly supported. Cycle Hire and Docking facilities should also be promoted as a visitor service for leisure purposes. An additional paragraph of supporting text should be added to the 'Better Public Transport' section. For example extending the TfL network or encouraging other cycle hire providers would enable people to explore the wider Regional and Olympic Park areas. Proposals within the Authority's PDF supports proposals to expand cycle hire facilities within the Park.

The Authority maintains its support for the AAP policies which seek to deliver a vibrant hub at Hackney Wick, however a minor change is required to improve the soundness of the Plan at this point. The AAP should recognise that the Hub with Hackney Wick station at its core has considerable potential to improve public access into the Regional Park by public transport (this should have been picked up via the evidence base). The Park Plan proposal Waterway Corridor 7f recognises this fact and states; *"Footpath and cycle route connections with the Corridor to be provided especially from outside the Regional Park and from public transport nodes such as Hackney Wick Station and Clapton Station. Existing links and bridge crossings to be upgraded and pedestrian and cycle access along the towpath safeguarded"*

Policy FI 5.1 'Delivering a vibrant hub at Hackney Wick' point 6 should be amended as follows:

6. New developments to be well integrated into the Hub and its surroundings, enhancing routes to, from and within the Hub to the wider Fish Island Hackney Wick area and **to the Lee Valley Regional Park and** future Queen Elizabeth Park. .

Creating a High Quality Environment

The Regional Park is a statutory designation that lies within and adjacent to the borough. It is a strategic open space and forms part of the boroughs green and blue grids. To ensure the soundness of the AAP this needs to be recognised within policies relating to open space provision within Fish Island East adjacent to the Park.

An amendment is needed to Policy FI 6.4 Fish Island East to ensure it takes account of the Regional Park as a key strategic open space. The following addition should be added to FI 6.4 - 6:

6. Development must enable the creation of high quality, usable and flexible linear open space along the waterfronts and include strong linkages across the area to strategic open space at Victoria Park, **the Lee Valley Regional Park** and the future Queen Elizabeth Olympic Park.

The Public Realm Priority Routes policy FI 6.7 is welcomed particularly the emphasis on development contributing to an enhanced open space network within the borough and the introduction of new open spaces in line with the Green Grid Strategy. The Regional Park forms part of the borough's green grid and it would be useful if the public realm improvement for Wallis Road identified under Policy FI 6.7, as one of the borough's priorities could include reference to the Regional Park as follows:

"Implementation

Wallis Road to strengthen the key route from Victoria Park, **Lee Valley Regional Park** and the future Queen Elizabeth Park to deliver a new park to park east-west route by enhancing the pedestrian and cycle environment."

I hope the above representations will be taken into account as part of the Submission versions of the Development Management DPD and Fish Island AAP. Please feel free to contact me on any of the matters raised.

Yours sincerely

Stephen Wilkinson
Head of Planning and Strategic Partnerships

Appendix Park Plan 2000 Extracts Section and Site Proposals relating to London Borough of Tower Hamlets

WC7 Waterway Corridor including Hertford Union Canal

In addition to Park-wide Proposal WC:

a Visitor facilities on or adjacent to the towpath at Springfield Park, Springfield Marina, Lea Bridge Road and Old Ford Lock, to be enhanced and promoted as focal points along the corridor.

f Footpath and cycle route connections with the Corridor to be provided especially from outside the Regional Park and from public transport nodes such as Hackney Wick Station and Clapton Station. Existing links and bridge crossings to be upgraded and pedestrian and cycle access along the towpath safeguarded.

g Existing green edges alongside the waterways to be protected and enhanced and new green edges established as part of developments adjacent to the water.

8 Area for informal recreation and nature conservation centred on the industrial heritage, green links and important water based habitats with major events, cultural activities and performing arts taking place on key sites and waterways.

a The high quality enhancement and interpretation of the heritage and ecology of key sites and the waterways to be continued in association with their promotion as an integrated range of visitor attractions. Educational activities throughout the area to be supported and expanded.

b Performance arts and arts events to be developed as a major part of the attractions and activities in and around the Three Mills Island and the East India Dock Basin.

c The network of paths, cycleways, waterways and other linear areas of Regional Park to be safeguarded and be:

- retained, where open to the public, as important pedestrian, cycle and boating routes,
- maintained as important wildlife corridors with new habitats created to diversify further this resource,
- extended to link in with adjoining areas especially where links can be established to other heritage, ecological, and visitor attractions, and
- interpreted to celebrate historic features of the area.

d Landscape and access enhancement work to be undertaken throughout to maintain the existing attractive features of the area, strengthen physical and visual links between sites and to celebrate the particular character and identity of each site.

e The creation of new waterside pathways to be encouraged and every opportunity taken to have land set aside as part of development proposals to accommodate these new routes.

f Improvements to public transport and the creation of safe access between public transport nodes, key sites and linear routes to be undertaken throughout this area and in conjunction with the Lee Valley Line Proposal. Unnecessary barriers to pedestrian and cycle access to be removed, Safe crossings of the A102M and A11 to be implemented and use of the waterways as an access option to be explored.

WC8 Waterway Corridor

In addition to Park-wide Proposal WC:

a Waterside focal points to be centred around Three Mills Riverside, Bow Locks and Limehouse Basin with the development of boat trips and walking trails to link together different areas of the Regional Park.

b The quality of the water to be improved and areas of open space and pockets of undeveloped land adjacent to the water corridor to be managed or maintained so that they contribute to its ecology and visual character.

c Environmental improvements to the boundaries of adjoining industrial sites to be instigated in partnership with landowners and key agencies.

d New development to be located and designed so as to safeguard existing paths, widen existing routes and provide new routes where this improves public access.

PW8 Lee Valley Pathway and Lee/Thames Link

In addition to Park-wide Proposal PW:

a The route along Greenway and the towpath of Three Mills Wall River to be improved and missing links or bridging points completed.

c Connecting links into Bow Creek and the East India Dock Basin to be implemented and routes from Canning Town Station to the Lee Valley Pathway to be signposted and promoted.

8.2 Waterside Gateway with good public transport connections and pathway links. Ecological resources and heritage features protected and developed as part of an integrated visitor attraction.

In addition to Section-wide Proposals:

b Existing heritage features and landscape at East India Dock Basin to be protected and enhanced to establish a high quality waterside gateway and entrance to the Regional Park. The potential for events, arts use and filming to be realised, using both the land and water resources with the development of links to similar and complementary facilities nearby.

c Water based trips and themed trails to be developed in conjunction with other sites in the Regional Park and along the Thames.

d East India Dock Basin to be conserved and enhanced as a bird refuge with foot and cycle access into and through the site carefully designed so that disturbance of the wildfowl is kept to a minimum.

e Pedestrian and cycle links between Bow Creek Ecology Park and the East India Dock Basin to be maintained and enhanced with the addition of safe, attractive crossing points of the A13 highway that divides the two sites.

f Pedestrian routes between this area and the local DLR stations and other public transport nodes to be clearly identified and waymarked.

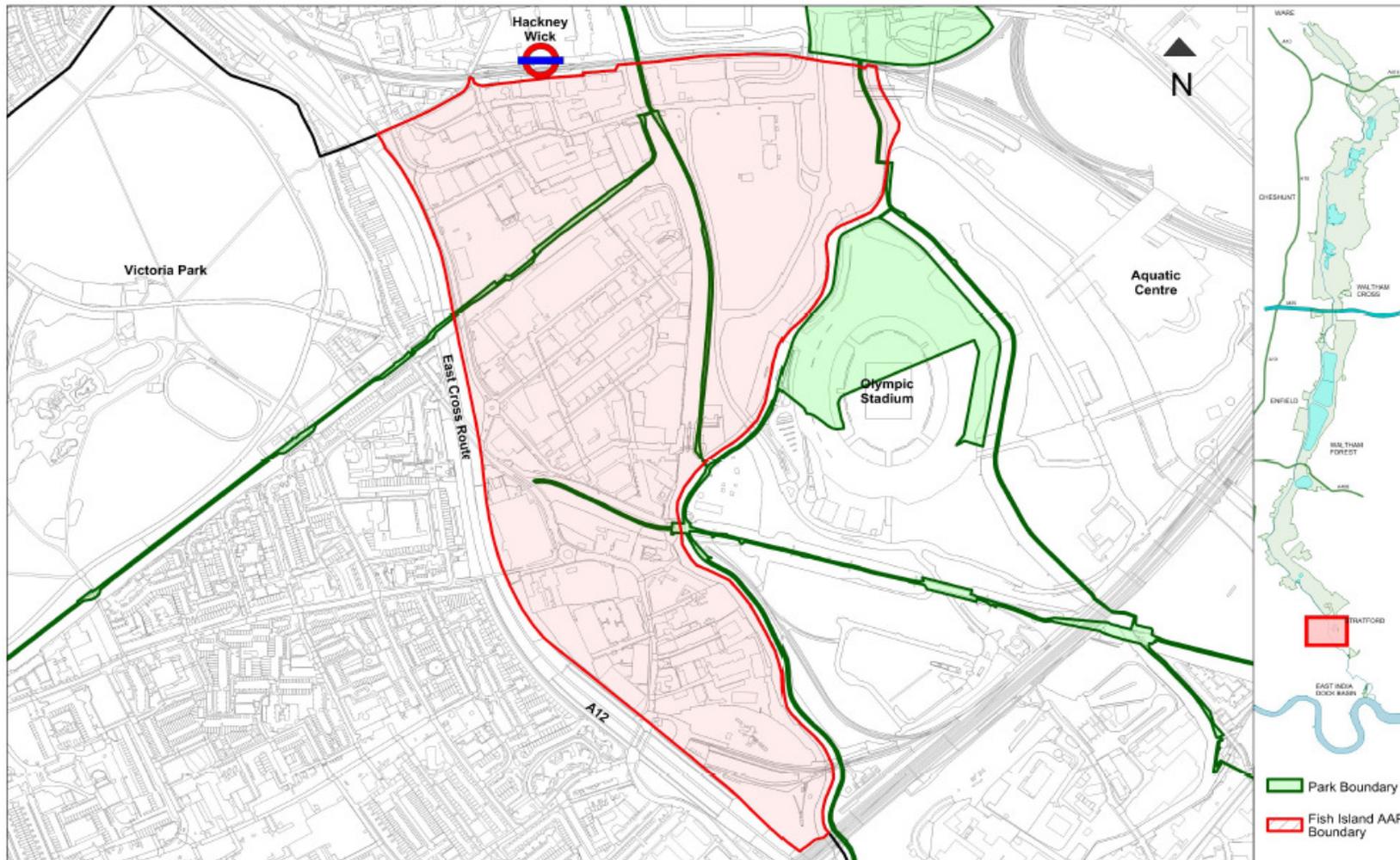
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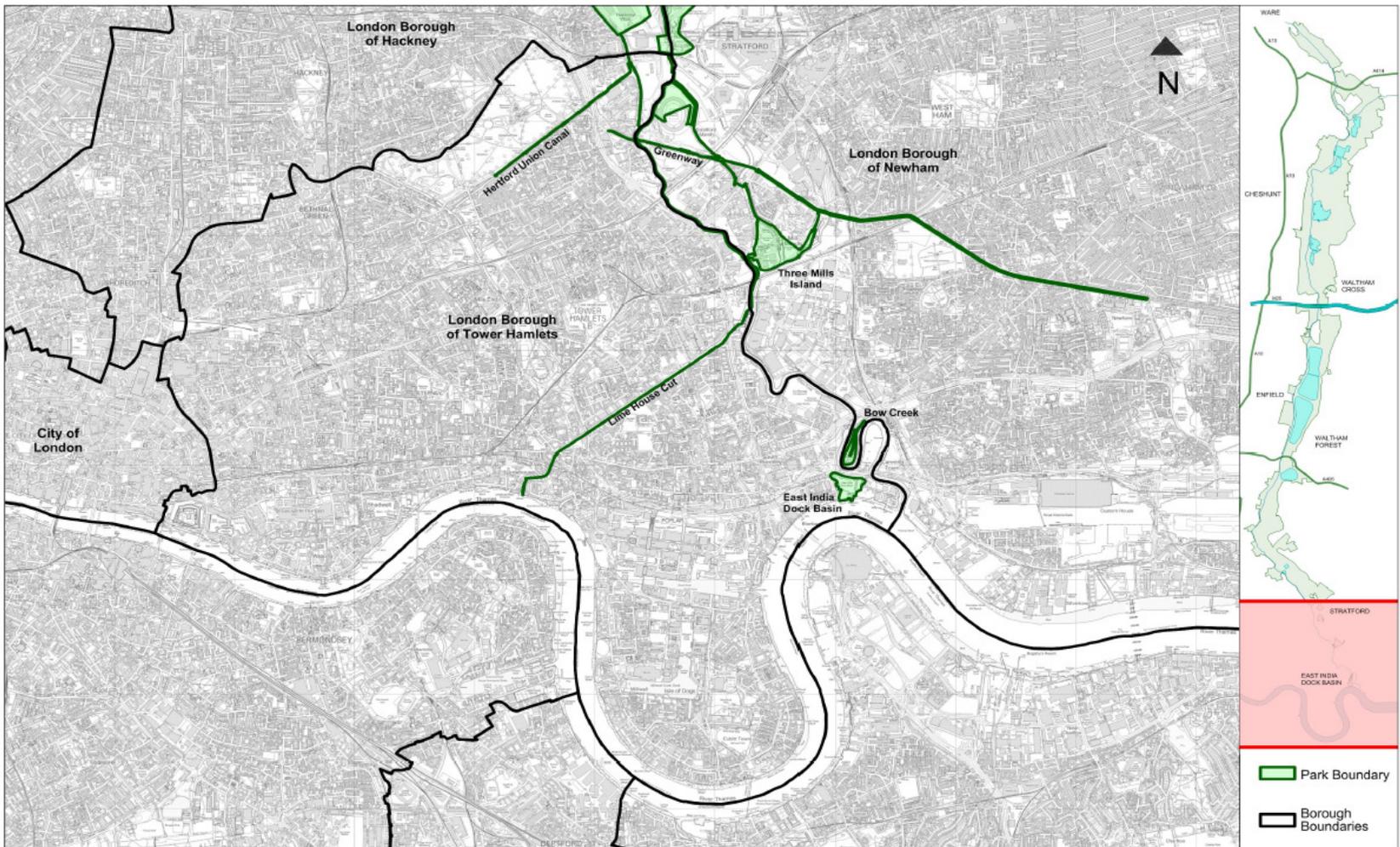
WC = Waterway Corridor

PW = Lee Valley Pathway Corridor

Park Development Framework Thematic Proposals Jan 2011

Thematic Proposals identify opportunities within the Park in Tower Hamlets for new visitor facilities particularly at East India Dock Basin in association with new land based recreation and leisure both within the Park and the Lee River Park. East India Dock Basin is designated as a site of special biodiversity interest where access to nature can be enhanced. East India Dock Basin is also identified by proposals as an important site for educational and volunteer activity and as a site for a proposed heritage facility.





LVRPA Within London Borough of Tower Hamlets

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