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Dear Darren

### **Draft London Plan consultation**

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

### **Abercrombie's Vision and the Authority's strategic purpose**

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

### **The existing and developing offer**

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

Furthermore, the Regional Park is a major venue for sporting and cultural events attracting around 270,000 spectators at over 300 events each year. Each venue and large areas of parklands are used for international, national and local events. Since opening in 2014, our two legacy venues within London, the LV Hockey and Tennis Centre and the VeloPark have hosted 18 international events. This year they will host the FIH Women's Hockey World Cup and the UCI Track Cycling World Cup with an emerging programme for the next three years which includes the Commonwealth Games cycling in 2022. The Regional Park will continue to play a significant role in meeting London's leisure needs during the plan period. This should be referenced explicitly in your plan.

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

### **Providing a framework for development opportunities**

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

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

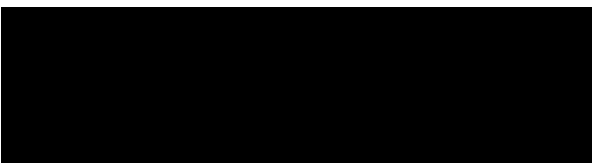
Whilst there are references to the Lee Valley Walk, the draft plan should recognise the importance of the Regional Park as it provides a route for walking and cycling to support visits through north east London – connecting to Hertfordshire and Essex. It is a key part of the Mayor's proposals for delivering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

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

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

I would also be happy to meet with you and your team to go through any of the above points. Thank you for considering our comments.

Yours sincerely,



Stephen Wilkinson  
Head of Planning and Strategic Partnerships

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