

PDF Area Proposals Consultation,
Planning and Strategic Partnerships,
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Date : 27th July 2012

Dear Sir/Madam,

Re: Consultation by the Lee Valley Regional Park Authority on Draft Proposals for the Regional Park from Coppermill Lane to the M25 Motorway – Areas 3, 4 and 5

Thank you for the opportunity to comment on the consultation on the Draft Area Proposals being developed as part of the Lee Valley Regional Park Authority's (LVRPA) Park Development Framework. I understand that the Draft Proposals for Areas 4 and 5 include areas within the London Borough of Enfield; therefore officer level comments are provided with respect to these areas below.

General comments

As you may be aware, the Council is making progress in preparing its statutory Local Plan, including the adoption of Enfield's Core Strategy (2010), s106 Supplementary Planning Document (SPD) (2011); and the current consultation on the draft Development Management Document (DMD), Central Leaside: towards a draft Area Action Plan (CLAAP), and Meridian Water Masterplan SPD which ends on 3rd August 2012. Work is also ongoing to prepare the North East Enfield Area Action Plan (NEEAP), and a direction of travel document should be available for consultation in early August. With the support of the Council, the Greater London Authority (GLA) are also preparing an Opportunity Area Planning Framework for the Upper Lee Valley to ensure that infrastructure planning and investment decisions are geared towards delivering the vision for this area.

The adopted and emerging documents in Enfield's Local Plan identify the regeneration potential and priorities for this section of the Lee Valley; which are focused on the Regeneration Priority Areas of Meridian Water and Ponders End. At Meridian Water, there is the potential for up to 5,000 new homes and up to 3,000 new jobs. The plans also propose significant links to the Regional Park, and opportunities to open up new access to the area. At Ponders End, three key development sites provide the potential for up to 1,000 new homes and a mixture of employment, leisure and community uses, some of which are directly adjacent to the LVRP. Overall, the strategic development sites in Enfield, and development across the wider sub region, will provide a critical mass of investment and regeneration in the Upper Lee Valley.

Given the momentum of change in this area it is encouraging that the Lee Valley's draft Proposals for Areas 4 and 5 refer to and aim to take account of the regeneration proposals being developed through Enfield's statutory Local Plan. The Council are keen to work with our partners, including the LVRPA, to meet shared objectives, generate cumulative benefits across the wider area, and facilitate a more holistic approach towards regeneration of the Lee Valley. Therefore, proposals to increase access to, the use of and enhance the quality of the Park, for existing and future residents are broadly supported.

Having reviewed the Draft Proposals for Areas 4 and 5, more detailed officer level comments are set out below for your consideration.

Detailed comments

Area Context

- Areas 4 and 5

This context should explain the future opportunities for change including reference to the regeneration proposals adjacent to the Park such as Central Leaside (Meridian Water) and North East Enfield (Ponders End). This would also be useful in providing clarification for the reader, as these Priority Areas and key planning documents are mentioned without explanation in the Schedule of Proposals.

It would also be useful to understand how the proposals contribute to delivering wider positive impacts such as the potential to generate local employment, skills and training opportunities, and we would welcome further information in the Area Context and Schedule of Proposals on this issue.

- Area 4, page 2, 1st paragraph – Areas 4 and 5 are designated as a Site of Metropolitan Importance for Nature Conservation (SMINC) and therefore the areas of ecological interest extend beyond the locations listed in this paragraph.
- Area 4, page 2, 8th paragraph - need to be clear that the proposals need to go through the planning process and relevant policy tests would need to be satisfied.

Schedules of Proposals - general

- Support references to Decentralised Energy Networks (DEN) on the Picketts Lock site, however the use of and contributions to the DEN should be a park wide strategy to ensure that any and all opportunities are captured.
- There are gaps in the Schedule of Proposals for the Community and Environment themes for 4A.1, 4A.3 and 5A.2. There is the potential to cross reference other proposals if they would otherwise be duplicated in these themed sections.
- As mentioned above, the Meridian Water Masterplan SPD is currently out for public consultation. Therefore, the content of the masterplan may change depending on the nature and extent of responses received. Please bear in mind this possibility and reflect any changes made to the Masterplan in the future preparation stages of the Draft Area Proposals. The consultation on the masterplan is due to end on 3rd August 2012, and it is anticipated that the masterplan will be adopted by early next year.
- See comments above regarding the need for information on other positive impacts.

Schedules of Proposals - specific

- 4A – All of the Environment proposals for the different sub areas should include and provide support for water freight along the River Lee Navigation, including any works required to the waterway to facilitate this. The Council are proactively encouraging and supporting more sustainable means of transport, and work is ongoing to consider the viability and feasibility of waterborne freight along the River Lee Navigation. This priority therefore needs to be reflected in the Draft Area Proposals.
- 4A.2 - The LVRPA proposals for this sub area need to consider the Thames Water proposals for their site on Lower Hall Lane. As you may be aware, Thames Water's proposals are currently subject to consultation.

Also, there are multiple proposals for this area, including flood compensation, orchard, outdoor active recreation etc. It would be useful if this document addressed how any conflicts between the different uses will be resolved and managed.

- 4A.2 (Biodiversity) – For clarification, please amend the text as follows (new text is shown in red): Restoration of land on both sides of the North Circular to include **flood compensation**, habitat creation and enhancement to strengthen ecological.....
- 4A.2 (Landscape and Heritage) – The Council have prepared a Report on

Location of Tall Buildings and Important Local Views in Enfield (2012) alongside the DMD; this report is available to download using the following link: <http://www.enfield.gov.uk/dmd>. You may wish to review and comment on this document, so that there is a clear consensus on key views for the Park.

- In combination with Area 5 proposals, 4A.3 should aim to improve entrances into the Park in this location. The northern section of 4A.3, west of the reservoir, also includes land which need to be upgraded, this should be reflected in the schedule of Proposals text.
- 4A.4 (Visitors) - The principle of developing Picketts Lock as an area for the development of additional sports and recreation facilities is supported by Enfield's Core Strategy. However, the Draft Proposals need to make clear that in some cases the nature of development (such as the hotel, spa and conference centre) would be considered inappropriate in the Green Belt, exceptional circumstances would need to be demonstrated, and a sequential test is required. More emphasis should be placed on the long term strategic vision for the site shared by the Council and the LVRPA, which is for new sports and recreation uses/facilities, and this section should show a commitment to developing and refining options with regards to this. Indeed, some of the potential leisure uses at Picketts Lock, which are still subject to further testing and options appraisal, have been identified in the Discover Central Leaside: Towards a Draft AAP document. However, the Council and the LVRPA together with its stakeholders should be guided through a coordinated approach to and development through the production of a masterplan or similar, setting out the parameters for future development, for this site.

This section could, however, set out the other key principles for this site, including the need for improved public transport and pedestrian accessibility, high quality design and landscaping taking into account the sensitivity of the green belt location, and a new towpath/pedestrian route along the River Lee.

The proposals for a water taxi are welcomed, however, there needs to be an understanding of the type of market for this to determine the destinations that will be served. There is the potential to link Picketts Lock into the adjoining area of Tottenham Hale to provide connection to the underground system and further south to the Olympics and its legacy transformation. The proposed foot and cycle bridge welcomed, and the Council hopes the LVRPA will work with the Council on these proposals.

- 5 - As you are aware, the adopted Enfield Core Strategy (2010) proposes the continued consideration of the potential merits, benefits and impacts of a Northern Gateway Access Package (NGAP) to improve accessibility and movements within north east Enfield and support existing and new businesses in the Upper Lee Valley. Enfield Council intends to build upon previous work to investigate the need for NGAP through the North East Enfield Area Action Plan (NEEAAP) process.

Proposals for this area need to allow for flexibility for these proposals to come forward, if it can be demonstrated that they are required. The Area Context should highlight this as a key issue and indicate high level support for the objectives of NGAP, which seek to improve accessibility and movements within North East Enfield.

- 5A.2 (Sports and recreation) – For clarification, please amend the text as follows (new text is shown in red): Any built facilities and new activities would need to be located and operated without detriment to the reservoirs designation as an SSSI and Green Belt

Maps

- The maps should highlight the location of key regeneration areas/proposals and reference relevant documents in the Area Context and Schedule of Proposals.
- There is inconsistency between the text and maps e.g. 5A.2 (Landscape and Heritage) – inconsistency with regards to open space adjacent to Mollison Avenue, 5A.4 (Community) – location of large art installation not shown on maps
- The maps includes shading/notations which are not shown in the map key, so it is difficult to interpret the proposals e.g. Area 4 (Sport and Recreation), Area 5 (Visitors), Area 5 (Landscape and Heritage). Therefore, we reserve the right and request to make further comments on the nature of proposals not clearly shown as part of the current consultation.
- Area 4 (Sport and Recreation)
 - This map identifies the potential for Sports Development Programmes on sites adjoining the Enfield borough boundary. Whilst broadly supported as a Park wide strategy, it would be helpful for these proposals, as they are developed, to consider any likely transport implications in the surrounding area
- Area 4 (Visitors) - The description of facilities at Picketts Lock is inconsistent with text in the Schedule of Proposals
- Area 4 (Community) - The art installation proposed south of the A406 needs further consideration. The potential reconfiguration of the road network in this location (around the Cooks Ferry Roundabout) may mean that the art installation will be better located further south or west.
- Area 5 (Visitors)
 - The siting of the proposed foot and cycle bridge needs to take into account the building on the western side of Mollison Avenue which is not currently shown on the map.
- Area (Environment) – The proposal for an energy centre and small scale wind

turbines is located outside of the LVRPA area. This could create confusion between the LVRPA proposals and those put forward by Enfield Council within its planning area. References to relevant Enfield Council documents which include these proposals need to be included so that the source of this information is clear.

- Area 5 (Visitors)
 - What is meant by the term small scale public facilities?

I hope you find these comments helpful in refining the LVRP Area Proposals within Enfield. The Council looks forward to working with the LVRPA on the regeneration opportunities across the Upper Lee Valley as a whole, and would like to be notified of and involved in future consultations on the Park Development Framework.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Lauren Laviniere', with a stylized, cursive script.

Lauren Laviniere

Senior Planning Officer
Planning Policy, Projects and Design.