

Core Strategy Preferred Options Consultation  
Spatial Planning Team  
Fir Tree House, Waltham Forest Town Hall  
Forest Road, Walthamstow E17 4JF

and by email to Andrew Russell, Spatial Planning Team

10th March 2010

Dear Sir or Madam,

## **Comments on the LDF Core Strategy**

This letter is a response from the Lea Valley Federation to the consultation on the LDF Core Strategy. We are aware that the deadline for comments has passed but trust that there is still time to take our views into consideration.

The Lee Valley Federation is a coalition of community groups and individuals concerned with the Lee Valley Park. The objectives of our organisation are to preserve the Park as a green lung for London, protect its open spaces from inappropriate development, promote better understanding and protection of Park wildlife habitats and to secure genuine user participation in decisions.

### General comments

The L.V.F. welcomes the general thrust of the document, which is a significant step to coming to grips with the many conflicting pressures acting on a planning authority in London. The writers are to be congratulated for the vital task of drawing together many previously unrelated spatial planning threads. The document promises greater clarity and focus on the task and we watch with great interest the detailed development of the strategy through the implementation phase.

The language used in the Summary document is in many places too generalised to be helpful to the lay person; specific locations and sites are not referred to, with the exception of Walthamstow Town Centre (Policy 8). The Vision set out at the head of the Summary was not clearly contextualised, and only made sense to this reader when read in the full Preferred Options report.

The L.V.F. is concerned with the Lee Valley Regional Park and the Report has been considered from the simple standpoint of the relationship between, and mutual effects on, the Borough as a planning authority, and the Lee Valley Regional Park. The Lee Valley Regional Park can have major impacts on the following Core Policies; 1, 3, 4 , 5, 7, 9 and 10.

Below are comments on various parts of the Core Strategy document.

### Policy 1

*1 Ensure a continuous supply of land and homes to meet a range of housing needs including affordable housing, family housing and accommodation needs of specific groups within the community, whilst doing more to offer a range of housing choices which are of high quality in the right places.*

by focusing on large brownfield sites for housing in Walthamstow Central, Blackhorse Lane and the North Olympic Fringe growths areas, encouraging investment in small site housing development, making the most efficient use of existing housing estate sites and bringing empty homes back into use. All sites will need to be well serviced by public transport and provide convenient access to employment opportunities and social infrastructure.

We suggest Policy SO1 might be more clearly put thus:

“Ensure a continuous supply of land in order to offer high quality well-located housing meeting a range of housing needs including affordable housing, family housing and accommodation needs of specific groups within the community.”

We note that the draft Sustainability Appraisal (p.28) recommends

The phrase ‘continuous supply of land’ is disingenuous and could be changed to indicate that Council will endeavour to maximise the use of its brownfield land in order to meet its housing targets or similar.

We agree with this clarification which accords with our view that development should be located in established well-serviced centres of activity.

### Policy 3 Cultivate Civic Participation and Social Cohesion

*Strategic Objective 3 -Strengthen and improve sustainable communities, and reduce existing deprivation in the Borough, by ensuring the timely delivery of appropriate social, physical and green infrastructure.*

The Lee Valley Regional Park is a very large, valuable, irreplaceable, multi use and sustainable community facility. Access to the park is one of the major benefits of life in Waltham Forest.

There are significant barriers cutting the Lee Valley Park off from the people of Waltham Forest, reducing people's perception of the existence and offer which exists on their doorstep, e.g. “severance valley”. LVF

believe that access to the Park for the people of Waltham Forest should be improved.

Improved access and use of the Lee Valley park by people in Waltham Forest will strengthen the perceived value of the Regional Park, which has historically struggled to be taken seriously by the various Authorities which border it or have jurisdiction over aspects of it.

We note and approve the intention to upgrade various green spaces within the Borough as transitional spaces between built-up areas and the Lee Valley Park.

We agree with the creation of links to the Lee Valley Park from Leyton along Ruckholt Road, and upgrading existing pedestrian bridges and underpasses across the rail tracks at Orient Way and Argall Way (as set out in the Northern Olympic Fringe document) and Coppermill Street. We agree with the proposal included in the Lea Bridge Framework – Issues and Options to create a link between the Low Hall open area and Walthamstow Marsh. These will however be problematic in terms of land acquisition and cost.

#### Policy 4 Responding to Climate Change

*Strategic Objective 4 - Ensure that our patterns of development and use of resources support the long term sustainability of our environment and respond to climate change in a practical and effective way.*

Developments within the flood plain of the River Lee should be discouraged because they require expensive mitigation and increased CO2 emission in construction and maintenance.

The topography of the Borough leads naturally to favouring development around existing centres and away from the flood plain.

Two sites that properly belong within the Lee Valley Regional Park are currently under development threat. Recently the site at Essex Wharf has come under threat of development for housing, and the Thames Water site is also threatened in the very near future. Neither of these sites are included within recent planning consultation documents relating to the Northern Olympic Fringe, or to The Lea Gateway. Both sites are placed in this position in the absence of strong historical direction from the land use plan for the Borough. Both these sites should now be clearly excluded from the possibility of housing or employment-led development and allocated to leisure-based use (“hubs of activity” as identified in the Lea Bridge Framework).

We approve the use of land east of Orient Way for new housing, which being more extensive and better located in relation to town centres and transport, is a more appropriate location than the Essex Wharf and Thames Water sites.

### *Protection and Enhancement of the Natural Environment*

The natural environment is valuable as a resource for human leisure, recreation and learning, and also as a reservoir of biological species diversity.

There is an unavoidable conflict between development and the protection of natural environments which no form of words can reconcile.

If access to an area of natural space with a given level of biodiversity is improved such that more people visit it, the diversity of species in that space is likely to fall, due to changes to the habitat and its disconnection from other natural spaces which could re-populate it.

Natural environments in the context of Waltham Forest will inevitably include land which may have been developed or used by human agency at some time in the past; many such sites if allowed to fall derelict in time build new levels of species diversity.

Biodiversity is a measure, not a quality, therefore biodiversity and natural spaces are not synonyms. Waltham Forest has spaces that can be thought of as natural but which may not be very high in measures of biodiversity.

The Plan maintains, and we do not dissent, that biodiversity of, and human access to, natural space are both desirable. We believe that the details of these conflicts should be addressed in greater depth. The Policy must define strategies to resolve, or in specific instances, to choose between the conflicting demands thrown up.

### *Developing a Sustainable Transport Network*

We approve the encouragement of waterborne transport; the River Lee is available on the western border of the Borough. We would like to see protection of suitable riparian sites which could be used for loading and unloading to water transport as described in the London Plan Blue Riband Plan.

### *Policy 7 Ensure Residents are Fit and Healthy*

We approve pledges to protect existing open spaces, Green Belt areas and Metropolitan Open Land, and to provide new spaces. Such opportunities are likely to be opportunistic, and open spaces will inevitably be distributed rather unevenly; chances to open up spaces in any appropriate location should be taken.

## Policy 8 Vibrant Town Centres

We agree with the objective of enhancing Walthamstow Town Centre and other gravitational foci. The policy is vague on differentiation between centres.

## Policy 9 Transform Design and Quality of Public Space

*Strategic Objective 9 - Create positive and inclusive environments (buildings and spaces) of high quality that contribute to the distinctiveness of Waltham Forest's neighbourhoods, whilst also protecting and enhancing the borough's built heritage assets.*

We agree with the general principles set out; we hope that the Lea Bridge Gateway, the prime opportunity for a high-impact link to the Lee Valley Park, will receive attention as part of this commitment to high quality urban design.

We note that the WF draft Equality Impact Assessment Report is weakly in favour of the Policy and identifies the London Plan as the only external driver for change. We believe that the policies and context of the surrounding areas and the various authorities which border on the Borough should also be examined and acknowledged i.e. LVRPA, LB Hackney etc.

Remarks about housing design & quality appear in Design & Quality of Public Spaces(13.10, .11), not in Housing Policy paragraphs, revealing a conflict between London Plan targets, and enhancing the quality of living in the Borough.

## Policy 10 Improving Community Safety

*Strategic Objective 10 - Ensure that Waltham Forest is a safer, more accessible and inclusive place where people want to live, work and visit and where anti- social behaviour, crime and the fear of crime no longer reduces the quality of people's lives.*

Policy CS 10 paragraphs A, C (which mentions the area of the Northern Olympic Fringe) and E are supported and that the relation between smaller and larger public spaces is acknowledged here.

## Implementation and Monitoring

### Working with Partners

We welcome the commitment to work in partnership with other Authorities able to contribute to the future development of life and work in the Borough. In particular we draw your attention to the contribution of the Lee Valley Regional Park Authority to infrastructure development.

### [Interactive Infrastructure Assessment Model](#)

We ask that Waltham Forest make the output from this model available to community groups and to the public. This will be a significant contribution to the objective of promoting civic participation and social cohesion (Core Policy 3)

### [Infrastructure Delivery Plan](#)

We welcome the proposal to introduce the Infrastructure Delivery Plan to match services and facilities to the provision of existing and new housing.

### Realising development opportunities in key regeneration areas

The commitment to focus regeneration and redevelopment in identified areas for reasons of environmental, economic and social sustainability is welcome.

### [Planning Regulatory Framework](#)

We strongly welcome a more robust approach promised by the commitment to a clear framework for planning decisions, and more prescriptive planning decisions at pre-application and application stage.

### [Planning Obligations](#)

We note the intention to pool future planning contributions from development in order to provide infrastructure identified in the Infrastructure Delivery Plan. We urge Waltham Forest to define a robust sense of value and to work in concert with other Planning Authorities when arriving at rates under the Community Infrastructure Levy (CIL) regime, shortly to supersede the Section 106 arrangements and to avoid adverse market effects of competition between Planning Authorities.

Yours,

The Steering Group  
Lea Valley Federation