

LEA VALLEY FEDERATION

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PDF Consultation

Lee Valley Regional Park Authority,
Myddelton House,
Bulls Cross,
Enfield,
Middlesex EN2 9HG

4th February 2010

Dear Sir or Madam,

Comments on the Draft Park Development Framework

This letter is a response from the Lea Valley Federation to the consultation exercise around the Lee Valley Regional Park Authority draft Park Development Framework. The Lea Valley Federation (LVF) is a coalition of community groups and individuals concerned to protect the character of the Lee Valley Park as a green lung for London.

Our central comment is that this Plan, unlike its predecessors, contains no specific land use proposals and that this omission is a fatal weakness. We are worried that the current draft PDF weakens the leadership and authority of the LVRPA in its duty to protect existing amenities and to develop the future amenities in the marvellous space which is the Lee Valley Regional Park. In the absence of leadership from the LVRPA, there is no strategic view and no protection of the Park.

The Value of the Lee Valley Park

Members of LVF know that the Park is a lifeline to many of us who live near it; for those who know it, it makes city life incomparably better than if it was not there. Lovers of the park have devoted time and pleasurable effort over years to knowing it, its pathways, woods, views, its birds, animals and vegetation in their detail, complexity and variety. Many use its irreplaceable spaces for recreation and competitive games.

The Park is land which speaks to us of space, of freedom and of possibilities; its borders defined by natural features, rising ground to east and west, and in its flood-plain the historic River Lea. It is a space where we learn about the relationships which make the natural world on which our civilisation and its economy depend.

We have been gifted the Park by those who preceded us. Not many years ago it was proposed to extract gravel from Walthamstow Marsh. A campaign saved the Marsh and today it is one of the finest pieces of open land anywhere in the Park. Many who won that battle are today preparing for another struggle.

The Park is again under pressure for developments incompatible with its status as a Regional Park, and which claim justification by reference to strategic regeneration aims. What is happening now at Essex Wharf is a clear example of the threat we are all faced with (see below).

Each generation must fight in order to learn the value of what it possesses. The Park would not exist had not people seen its value and protected it with vigour, persistence and political dexterity. Guardianship of such a delicate environment demands strength of mind and political will from the guardian, the LVRPA.

There will be new pressures in the future, many of them around issues of environmental quality, such as river water. A LVRPA well-armed with arguments and prepared to fight for its responsibilities will win support. We want the LVRPA to stand up to pressures from government when it, from its remoteness, imposes a narrow, incomplete definition of our best interests.

The LVRPA must define a robust plan in order to defend the Park. We believe the law charges it to do this.

The warning from Essex Wharf

The consequence of failure to create a robust plan for the Park is starkly shown by the threat to Essex Wharf, opposite Millfields; in the last 2 years an attempt to build housing on this site has been defeated, not, unfortunately, on the principle of its unsuitability for housing, but on the far weaker ground of poor design. The LVRPA opposed the scheme on the grounds that the site was best suited for leisure-orientated use, as its then-current plan envisaged. Now, another bid for housing on the site is currently under consideration by Waltham Forest.

The LVRPA must bear some responsibility in recent times for failing to persuade Waltham Forest to accept its own leisure-oriented vision for this site; we wish that the LVRPA make stronger efforts in future to back up its ideas; the planning authority for its part has grossly failed in its responsibility to specify any use whatever for this significant site, leaving it effectively up for grabs.

Housing on this site would traduce the Park concept, and if built will create a problem for the boroughs of Waltham Forest and Hackney, marooning a large number of people on an isolated site which all published plans have defined as a part of the Park/river system.

This is not how our planning process should work.

Specific criticisms of the Draft PDF

1. The draft PDF, having no specific land use proposals, allows the riparian authorities to ignore LVRPA proposals in the face of more urgent pressures when drawing up their own statutory plans.
2. Flexibility on the part of LVRPA is desirable in pursuit of the vision of the Park's future, but without a robust plan flexibility cannot protect the Park from development which, while conforming with economic and other aims of the London Plan, will compromise and reduce the value of the Park as a recreation resource to the people of London.
3. The LVRP is unaffected by recent legislative changes in planning law. The LVRPA is therefore not required to replace specific land use proposals with development frameworks, though this is what it has done. As stated at

(1), without land use proposals the LVRPA cannot discharge its duties to plan and guide development nor protect the Park as the Act requires.

4. The Lee Valley Regional Park Act Section 14(1) requires the Park Authority to:

Prepare a plan showing proposals for the future use and development of the park, and ... from time to time review such proposals.

This is so that riparian planning authorities are aware of the LVRPA's land use proposals and can reflect them in their own statutory spatial development plans as set out in Section 14(2) of the Act:

Shall from time to time include in their development plans or in any proposals for any alterations or additions to their development plans such part of the [Park Plan] as relates to their own area.

Therefore, we believe, the current PDF does not meet the requirements of the Act.

Many East Londoners are looking to the LVRPA to lead on this and actively protect the imaginative vision of the Park first proposed by Patrick Abercrombie. The current consultation period has been too short and the chance to engage with the wider public has been missed. Consultation has been less extensive than for both the preceding plans. The draft plan must be revised and re-consulted.

Yours,

Steering group
Lea Valley Federation