



**Campaigning to protect the Lea Valley Park as a green lung for London**

27<sup>th</sup> July 2012

PDF Area Proposals Consultation  
Planning and Strategic Partnerships  
Myddleton House  
Enfield  
Middlesex EN2 9HG

Dear Sirs,

Consultation Response  
Areas 3 to 5

The Lee Valley Federation offers the following comments on the Park Authority's proposals.

#### General Observations

We find ourselves largely (but not entirely) in agreement with the proposals, as far as they go, but we are very concerned about the lack of ambition of the Park Authority to make more of the Park in Areas 3 to 5. The comments that follow are no doubt more "high level" than the Park Authority desires but we hope that the Park Authority will give careful consideration to them.

It appears to us as follows:

1. There is a lack of identity, a lack of activity, a lack of animation, and a lack of people throughout this stretch of the Park. There are some islands of Park-related activity – at Picketts Lock and the King George V sailing base for instance – but the sense as one passes through the Park in this area is that it is neglected and uncared for. If we can give an example, a tour of the periphery of Banbury Reservoir reveals nothing but neglect, squalor and dereliction. If one were to tell a visitor from abroad (or Mars) that this area has for more than 40 years been part of a Regional Park dedicated to leisure

and recreation, the visitor would think one mistaken or deranged! Indeed, in relation to the areas north and south of the North Circular there is a feeling that the land has been expropriated from local people (due to the creation of barriers, and the general neglect), rather than being made available for their enjoyment.

We think it is right to draw a distinction in this respect with areas further north and south where there is a greater sense of human presence and activity (not just confined to the formal leisure facilities) of people enjoying the “green lung” which is a very large part of what the Park is supposed to be about.

2. The lack of any sense of Park identity makes the whole area more vulnerable to development pressures. It also makes it harder for the Park to argue convincingly for planning gain in relation to proposals like Meridian Water. If the Park Authority has cared so little for the environment over 40+ years – it might be argued – how strong is the case for giving this agenda priority now?
3. We feel that the Park Authority has become caught in an unvirtuous circle where neglect has led to declining interest in or awareness of the Park. We surmise that the response of sporting and community groups to the Area 3 to 5 proposals will prove to be minimal. The Park Authority might take this as representing approval of its proposals. Or it might take it as an alarming signal of lack of awareness and interest in what the Park Authority is doing.
4. The Park Authority will have its “hubs” making the case (without great conviction we feel) for four hubs – at Hale Wharf, Stonebridge Lock, Banbury and Ponders End as well as a “strategic leisure destination” at Picketts Lock. To take just one of these – there seems to be no rhyme or reason for a hub at Ponders End other than the fact that a (not very high capacity) road crosses the Park at this point.

We do not argue against hubs in principle and indeed we argue below for more ambition rather than less in relation to one of them – Stonebridge Lock. But we think that the Park Authority needs in this area to forge attractive and legible spaces between the hubs (actual or imaginary) which the Park Authority wishes to have.

5. We deprecate a planning process where the Park Authority every 10 to 15 years makes the appropriate plans and then does nothing to bring them about. To take the land around Banbury Reservoir as a case in point, the 1986 Park Plan proposed

Site No 8.1      With the agreement of Thames Water the area will be landscaped to improve its present unsatisfactory appearance and to make it available for informal recreation

In the 2000 Park Plan we have:

- 5.3.e Boundaries of individual sites and alongside the North Circular to be protected and improved
- 5.3.f Landscape investment to be made at the entrance to the Regional Park from the North Circular Road. Any improvement should be of a high design quality to reflect this gateway to the Regional Park.

We do not doubt that the appropriate response for the Park Authority to this expression of concern is to say that implementation and phasing of the new Park Plan – once approved – is a matter to be considered by the Park Authority in the light of available resources and other priorities. We could not argue with that response but we would like to see some acknowledgment on the part of the Park Authority – in its deliberations on these proposals – that it must have the commitment to do immeasurably better in the coming Park Plan period.

6. We draw attention to the Upper Lee Valley Landscape Strategy issued in February 2010 which identified a large number of projects for the improvement of the environment within Areas 3 to 5 which receive scant reflection in the current proposals. It seems to us in fact rather bizarre that so much work should have gone into the Upper Lee Valley Landscape Strategy only for many of its proposals to be ignored in the proposed Park Plan.

We run at this point into a difficulty that we encountered in making representations about the Walthamstow Marsh Landscape Design Strategy. We were told by Mr Cairns – the then Head of Environmental Design – as follows:

*The Authority will over the course of the coming 12 months be developing more comprehensive area based proposals for the Park as part of the ongoing refinement of the Park Development Framework. That process will include a structured engagement process for landowners, local authorities and user/interest groups, and we believe this will be a more appropriate vehicle for articulating the Authority's proposals for land within the Park but owned by others.*

In other word the Park Plan Proposals (in that case Area 2) were the “*appropriate vehicle*’ to articulate land use proposals. But in practice, the Area 2 proposals entirely lacked the granular level of detail in the Walthamstow Marsh Landscape Design Strategy. We therefore arrive at a situation (which looks all too likely to be replicated in Areas 3 to 5) where the formal statutory planning document deals in broad generalities whilst the detailed document – containing excellent granular proposals – gathers dust on the shelf.

May we ask how the Park Authority addresses this point?

7. Related to the previous point – the current Area 3 to 5 proposals contain strikingly less detail of what the Park Authority actually proposes to achieve than the plans for the corresponding areas in the 2000 Park Plan and also generally significantly less detail than the proposals for Area 2. When the Park Authority accepted that the Park Development Framework needed to be augmented with area plans (in order to satisfy the requirements of the Lee Valley Regional Park Act) the implication was that there would be a reasonable level of specificity about what the Park Authority hoped to achieve.

We feel that there is some ambiguity whether the Park Authority now sees this document as a planning framework or a Master Plan – in our opinion these proposals are borderline at best in meeting the requirements of the 1966 Act. We also suspect that the Park Authority has taken on too large an area and applied too little resource in bringing out this batch of proposals.

We hope that the Park Authority will be open to taking some of its proposals to a higher level of detail before finalising them.

8. Finally, in these general comments, we draw attention to what is said in the Introduction to the Upper Lee Valley Landscape Strategy.

*“The Upper Lee Valley<sup>1</sup> contains potentially outstanding areas of green spaces, waterways and reservoirs. These spaces have the potential to significantly improve the quality of life of people who live and work in the area and spread the benefits of the Olympic legacy. At the same time, the area suffers from a significant fragmentation, a lack of visual and physical connectivity and unclear function, leading to a lack of a sense of place or strong unifying identity. A disconnected landscape, poor environment and low value land uses reinforce a poor image and an undervaluing of the area by local communities.”*

We are in entire agreement with this statement and we consider that the success of the Park Authority in Areas 3 to 5 will depend on the extent to which it addresses these issues.

In relation to Walthamstow Wetlands and Douglas Eyre we wish to table as part of these submissions the proposals set out in our leaflet “Lower Lee Marshes” which are on the Federation’s website and are being submitted with the hard copy of these submissions.

We hope that these observations will be brought to the attention, without abridgement, of the members of the Park Authority.

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<sup>1</sup>The “Upper Lee Valley” is a term of art in this document but the preponderant part of it deals with Areas 3 to 5.

## Comments on Specific Proposals

Since the main expertise of members of the Lea Valley Federation is in the south of Areas 3 to 5, our detailed comments are mostly limited to Area 3 although we also make some brief comments on areas further to the north.

What follows are comments rather than drafting proposals. We assume that – as for Area 2 – there will be a further iteration of the plans after the Park Authority has considered the first round of comments. We would make more specific drafting proposals at that point.

### Area 3

Walthamstow Wetlands Visitor Proposals	<p>The proposals are clearly strongly influenced by the current proposals of the Walthamstow Wetlands Project. We are strongly supportive of that project and can entirely understand why the ambitions of the project have been scaled down to some degree in making the current HLF application. We would suggest, however, that in defining ambitions for the next 10–15 years the Park Authority should be stronger in stating what it hopes might be achieved over that period. Specifically:</p> <ul style="list-style-type: none"><li>•1 Access to the site from Coppermill Lane should be expressed as a more unequivocal objective. We do not doubt that there are management issues to be addressed but the important point is that the Reservoirs abut areas (in Area 2) which are actively used and enjoyed by large numbers of people. If an active connection can be established between Area 2 and the Wetlands this would be quite transformative in attaining the connectivity agenda put forward in the Upper Lee Valley Landscape Strategy. We suggest that the Park Plan should say something along these lines.</li><li>•2 The Plan should also advocate seeking to achieve a point of access (not necessarily 24/7) from Douglas Eyre playing fields – see further comments below</li><li>•3 We understand that the release of West Warwick reservoir by Thames Water is off the agenda for the present but in a 10–15 year planning document the objective of securing West Warwick for Park use – which would wonderfully enhance the connectivity and legibility of the Park – should be very strongly expressed.</li></ul> <p>Furthermore, we strongly feel that this document should set out a commitment that even if West Warwick is not released, the Park Authority</p>
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Walthamstow Wetlands Visitor Proposals

will use all efforts to secure: (i) a reasonable scheme for access to the Reservoir and (ii) a cycle-access route at the base of the reservoir adjacent to the railway line. Whilst we do not doubt that Thames Water takes a cautious view about public access the fact is that many reservoirs have public access and moreover the Walthamstow Reservoirs as a whole *already* are already accessible to the public to a sufficient degree to satisfy any potential malevolent user<sup>2</sup>. What we seek, and what we think this Plan should encompass, is an ambition to make West Warwick accessible in a more effective and visible way, particularly by creating new points of access. (Please see also comments re Markfield Park below.)

- <sup>4</sup> There is considerable open space on the western margin of the reservoir site north of Forest Road and there should be an objective to create connections with The Paddock (see further comments below) and Tottenham Marshes.

Landscape and Heritage

(1) The Plan advocates bringing the Old Coppermill into public use – with which we agree – but we would like to see this ambition given more point and emphasis. The River Lea Valley has a fascinating early industrial history<sup>3</sup> and there is a lack of convincing facilities in the Park supporting interpretation<sup>4</sup>. The Coppermill, representing a site where there was a working mill – put to a variety of uses over the centuries, and sitting athwart a recognisable mill stream (although sadly neglected by the Park Authority in its lower reaches), represents an ideal historical interpretation centre. As we understand it, the Coppermill is somewhat on the back burner within the Walthamstow Wetlands Project which has to temper its ambitions with realism about what can be funded in the short term – but we would like to see the case for Coppermill as a heritage resource more clearly articulated in this document.

(2) There is a particularly valuable river landscape from Spring Hill to Forest Road with the whole of the East Bank being in the ownership of Thames Water. It seems to us that there is some danger that proposals could be brought forward to develop north of the railway crossing. The Plan should express a positive object to protect and preserve the landscape and ecological margin by the river.

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<sup>2</sup> There is open access at Ferry Lane for payment of a £1 fee into a slot machine. The charge is not enforced and anyone can walk in without paying if they wish.

<sup>3</sup> This history has been extensively documented in the work of Dr Keith Fairclough

<sup>4</sup> There is interpretation at the Tide Mill at Three Mills but limited to that site

## Markfield

Markfield clearly functions primarily as an urban park but the work done at the northern end to restore the beam engine and filter beds (as well as the introduction of an excellent café) has given it an added dimension. What Markfield lacks is any connectivity with the rest of the Park and it is a fact that many regular users of Springfield and the Rowers' café are wholly unaware of Markfield. A bridge connection to West Warwick and the creation of a new route linking to Walthamstow Marsh (also creating new circular walking possibilities) would transform this situation and the Plan should say this.

## Douglas Eyre

Douglas Eyre is a dead end space which could easily be connected with adjacent areas of the Park without sacrificing its present sporting use. We agree with everything in the document, particularly the proposal to create a through route on the western margin and enhancement of landscape character. We would like the document to go further by:

- 1 Supporting the creation of a woodland ecological margin at the north end where there is a derelict changing pavilion and no current sporting use.
- 2 Supporting the creation of an entrance point – almost certainly part time – on to the reservoirs using existing bridges over the flood relief channel
- 3 Supporting access to Blackhorse Road using the existing gate giving on to Hawarden Road and to Forest Road using a disused path under the railway line.

Our proposals are illustrated in our “Lower Lea Marshes” publication.

## Tottenham Marsh – Stonebridge Lock

Stonebridge Lock presents an interesting opportunity for a leisure hub. In common with Spring Hill:

- 1 it does not (and should not) have capacity to deal with a high volume of cars and parking
- 2 it is (just) sufficiently remote from traffic and surrounded by green space, to have a verdant, riparian quality.

The Park Authority should see Spring Hill as a template and consider how the quality of this area can be built on to create an attractive and peaceful riverside hub.

We have the following suggestions:

- 1 There is an extreme shortage of moorings and we would like to see the possibility of excavating a dock explored to increase the number of

Tottenham  
Marsh –  
Stonebridge  
Lock

moorings. The Park would need to work with and/or sponsor groups genuinely representing the interests of the boat-owning community. The Park Authority will be aware that many boat owners have quite alternative lifestyles and if they are genuinely involved in the ownership of whatever is created; it will create secondary activity (such as cafes, floating bookshops and potteries and so forth) which will create activity and interest. The Upper Lee Valley Landscape Strategy proposed a produce market for Stonebridge Lock and we should like to see a space for a weekly market and other small scale outdoor events designed into the proposal.

- 2 Tottenham Marsh was at one time much more used by the local community with local facilities including a much-loved outdoor swimming pool before the war. We would suggest that an outdoor pool be re-introduced, not an Olympic type pool but one with a large grassy sitting out area. Outdoor pools are at a premium in London and pools aimed at relaxation over fitness are almost non-existent. This proposal is also made in the Upper Lee Valley Landscape Strategy and we would also endorse and support the proposal in the Strategy for a paddling pool.

- 3 Stonebridge lock lies at the southern end of a lengthy lock free section which will presumably become more appealing when the Meridian Water development replaces the current dereliction close to N. Circular Road. The Park Authority should explore with voluntary groups whether a facility for canoeing or rowing would have demand (without cannibalising the support for facilities at Spring Hill and Springfield).

- 4 Lastly, whilst we do not advocate change to the general character of Wild Marsh West, we consider that the character of the river could be greatly enhanced by a programme of tree planting.

We think that all of these ideas are more likely to “fly” if the Park Authority works with third parties rather than necessarily acting as provider itself.

All of these proposals would work with the grain of the Authority’s proposals for cycle hire, pedestrian access etc.

The Park Authority faces the difficulty that there is little engagement with this area (for which the Park Authority itself bears some responsibility). So it is unlikely that the local (or wider) community is likely to express aspirations of the sort outlined above – either spontaneously or in relation to this consultation. We would like to see the Park Authority actively engender discussion of proposals of this nature. If the Park Authority is with us on this point it will need to consider how they can be foreshadowed in this Park Plan.

#### Hale Wharf

We appreciate the difficulties at Hale Wharf and broadly support what is said here. We would add that if there are convincing proposals to increase the use of Tottenham Marsh this strengthens the case for leisure use of Hale Wharf.

We do not agree with the wholly negative comments about the “rationalisation” of moorings and we would like to see more moorings permitted.

Lastly we believe that the creation of a commercial wharf should be actively canvassed in relation to Hale Wharf. We appreciate that the demand for such a wharf is unproven but this is a 10–15 year planning document and moreover any development plans for Hale Wharf would have a much longer timescale. We think that the fact that the Park Authority’s formal remit as is a provider and enabler of leisure should not blind it to the desirability of supporting commercial navigation. The character of the Lee Navigation as a navigable waterway is one of the most important factors forging a legible unity between the different geographical areas of the Park. It seems to us entirely right that, given the suite of responsibilities that it has under the 1966 Act, the Park Authority should speak up for uses which promote the use of the waterway.

#### The Paddock

The Paddock is a pleasant enclave but appears to be little used, being an entirely dead end space adjacent to a busy road. The Paddock could be linked to Hale Wharf and also it could be linked by a bridge to the very attractive land on the western margin of Thames Water estate by the River Lea diversion. There is clearly scope for some of this land to be taken out of the operational site. We therefore strongly support the exploration of options to create a link to the Walthamstow Wetlands and would prefer to see this point expressed somewhat more strongly.

#### Ferry Lane – Forest Road

We consider that partially removing the southern wall to open up views would detract from the sense of isolation of the Walthamstow Wetlands and would be an entirely retrograde step. We also consider that any replacement fence would also be an unattractive eyesore, whereas the existing wall is not.

## Area 4

We have no substantial comments on the proposals for Area 4, all of which appear to us to be helpful and in particular we agree with the aim of the Park Authority for further development of Picketts Lock.

We would only repeat our general remarks in relation to this area. Aside from Picketts Lock it seems to us that the Park Authority, over more than 40 years, has scandalously neglected its duties in this area resulting in the utmost lack of connectivity and a general air of dereliction. The Park Authority needs to create a plan/programme to improve the environment of this area and we should like to see the Park Authority use the park Plan to commit to doing so.

## Area 5

Ponders End and Lea Valley Road	We are generally in favour of the proposals but think it better to concentrate on individual schemes and proposals on their respective merits rather than to think in terms of a visitor hub.
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	There is a long quiet lock-free stretch to Enfield lock making canoe hire facilities a reasonable option. We suspect that Enfield Lock, being more of a character area may be a more attractive base (and the implication in terms of traffic would be very modest).
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King George Reservoir and margins	We consider that the Park Authority has for over 40 years missed the opportunity to make something of the very attractive corridor of land to the west of George V between Ponders End and Enfield Lock. We are unsure of the ownership of this land but there is obviously scope for a very major programme of tree planting and the creation of a tree-lined bridleway to complement the towpath. (A cycle hire facility at Ponders End is much more likely to “fly” if there are attractive routes to cycle.)
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	We also consider that the redevelopment of the Brimsdown bank has been quite haphazard – some new developments respect the riverbank – others impinge harshly upon it. We appreciate that the Park Authority does not own this land and we believe that it is not in the Park but the Park Authority should take some responsibility for the future to work with the local authority and others to create incentives for owners on the west bank to create a landscape and ecological margin on the river bank.
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King George Reservoir and margins	We agree with what is said about George V save that (subject to ornithological advice) it would be very desirable to create some access/viewing point on the north west, as well as the north east side, linking to Enfield Lock.
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Enfield Lock	<p>The area to the south of Enfield Lock – around Swan and Pike Pool is particularly secluded and attractive and we consider that the Park Authority (acting as a landowner and also using encouragement to neighbouring utility landowners) could act as enabler and catalyst (rather than as provider) should seek to protect and enhance this area. We consider that there is almost certainly scope for voluntary sector activities which could bring life and animation to the area (as at Spring Hill Hackney).</p>
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We suggest as follows:

- The Park Authority needs, as a policy, to apply more resource to the housekeeping of this area – starting with a very small scale centre with toilets and space for cycle hire and a leased out cafe.
- A more active but light-hand approach should be taken to maintaining and improving the environment, starting with Swan and Pike Pool
- The Park Authority should take responsibility for promoting a park-compatible use for the area of the Rifles pub.
- The Park Authority should initiate local consultation (involving Enfield Council) soliciting proposals for park-compatible projects
- The Park Authority should commit itself as landowner/landlord to facilitating appropriate park-compatible proposals.

In brief – by setting its sights at an appropriate level, we think that the Park Authority has some prospect of engendering a virtuous circle leading to greater use and enjoyment of this attractive area.

Gunpowder Park and Sewardstone	We suspect that Gunpowder Park needs a re-think; it somewhat falls between two stools as the wild informal space it used to be and the more formal recreation space (wide gravel paths and visitors' centre) that the Park Authority has aimed to achieve. We think that possibly the Park Authority should consider a separate consultation exercise with users about the future of this area.
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Myddleton  
House

We think that the work done by the Park Authority has greatly enhanced the appreciation and enjoyment of these wonderful gardens and we could not more strongly agree that steps should be taken to connect it to surrounding Green belt space, particularly by the creation of bridge(s) across Turkey Brook to Forty Hall.