



Enfield Council
Civic Centre
Silver Street
Enfield
EN9 3XA

8th September 2021

Dear Helen

RE: CONSULTATION ON THE NEW DRAFT LOCAL PLAN MAIN ISSUES AND PREFERRED APPROACHES (REGULATION 18 CONSULTATION) - LEE VALLEY REGIONAL PARK AUTHORITY REPRESENTATIONS

Thank you for consulting the Regional Park Authority on the new Draft Local Plan Main Issues and Preferred Approaches document (Regulation 18 consultation).

A report on this matter was considered by the Authority's Members at the Lee Valley Regeneration and Planning Committee on the 6th September 2021 when the following comments were agreed. Recent meetings between officers have already proved useful on key matters relating to the Local Plan and sites within the Regional Park and further more detailed discussion on the matters raised below would be welcome, particularly in relation to the Pickett's Lock site allocation and the detail for industrial site allocations within the Regional Park.

Draft Local Plan Vision and Objectives

The Authority notes the comprehensive range of strategic and development management policies included within the current draft Local Plan and endorses the strong emphasis within the spatial vision and its four underpinning themes on establishing a high quality, biodiverse and green environment for the well-being and enjoyment of Enfield's residents, employees and visitors; the Regional Park and the work of the Authority make an important contribution to the vision in this respect.

It would be appropriate therefore for the strategic objectives to include a reference to the Regional Park, potentially under the 'Deeply Green Place' theme. For example, an extra bullet point could be added stating

"To support the Lee Valley Regional Park Authority in the protection, enhancement and provision of the diverse range of open space, habitats, sporting and leisure venues within the Regional Park in accordance with its Park Development Framework proposals."

A substantial area of the Regional Park lies within the London Borough of Enfield, (approximately 653 hectares, or 16.27% of the total Park area) and includes sites such as the open spaces of Rammey Marsh, the King George V and William Girling reservoir SSSI, Enfield Lock and the Lee Navigation, the Lee Valley Athletics Centre and Pickett's Lock and land either side of the North Circular Road. PDF Area Proposals for the Park area within Enfield were adopted in April 2013 and focus on improved visitor facilities and public access, redevelopment of Pickett's Lock as a strategic leisure destination, and habitat enhancements at Rammey Marsh and Swan and Pike Pool. Partnership working is also highlighted as a key mechanism for habitat and public access improvements, particularly in relation to the large areas of water in this area; the reservoirs, Lee Navigation and at Ponders End Waterfront.

Lee Valley Regional Park and Placemaking

The main concern with the current plan is the lack of specific policy support for the Lee Valley Regional Park and the Park Development Framework proposals. The current Core Strategy includes support for the Park under Policy 35 and an equivalent is sought within the new Local Plan in order to satisfy the requirements of the Park Act 1966. A policy statement supporting the adopted Park Development Framework Area proposals as they relate to the Park within Enfield would fulfil the requirements of the Park Act Section 14 (2) (a); explanatory text should set out the statutory role of the Park Authority and its planning functions; examples of text to be included are attached as Appendix A to this letter.

This additional policy could sit within the Placemaking section of the Plan, potentially by adding a new second part to Policy PL8 Rural Enfield, given that the Regional Park makes up the eastern half of the 'Rural Enfield – London National Park City' designation. Placemaking Policy PL8 could be renamed '**Rural Enfield and the Lee Valley Regional Park**'. Alternatively, the policy could be included within the 'Blue and Green Enfield' section 6 of the Plan, given the Regional Park is a significant element of the Borough's green and blue infrastructure. The following wording is proposed as a starting point for discussion with explanatory text included in Appendix A:

Lee Valley Regional Park Policy

The Council will support the work of the Lee Valley Regional Park Authority to realise the full potential of the Regional Park in accordance with the Park Development Framework proposals and to deliver a diverse range of open green and blue spaces, habitats and ecological enhancements, major sporting and leisure venues and visitor attractions.

Placemaking Meridian Water Policy PL5.

The Placemaking vision for Meridian Water is supported and detailed policy guidance for this area welcomed in particular the points relating to the delivery of green corridors, public open space and the requirement for development to contribute to the naturalisation and ecological enhancement of existing waterways. Reference to the Lee Valley BAP is welcomed under bullet point 5 as is the requirement that planting must be consistent with the habitats and character of the Lee Valley Regional Park.

A clearer statement is required within the placemaking vision and policy about the need to establish attractive and safe walking and cycling links through to Pickett's Lock in the north and areas of the Park to the south. Reference is made (bullet point 9) to the need for Development to "deliver new strategic connections from Meridian

Water to key destinations (such as Edmonton Green, North Middlesex Hospital and Angel Edmonton) and neighbouring Boroughs (via the Lee Valley Regional Park) to overcome physical severance”, but Pickett’s Lock should be named as a key destination in its own right and the policy emphasis should be on walking and cycling connections. Likewise, connections through to the south at Tottenham Marshes and to the wider extent of the Park beyond need to be highlighted to present the full scope of open spaces and leisure opportunities available and which will be on the doorstep for the new residents and employees of Meridian Water

The Authority is supportive of the aspiration for the enhancement of the river and to encourage the public connection to the waterways, however the need for space for nature should not be overlooked. Within emerging designs, refuge or quiet areas should be incorporated to enable species with a large home range, such as otter to both move through and rest up. Similarly, for species such as Water Vole to colonise and establish territories, breed and thrive there is a need for undisturbed areas.

Concern remains however about the demands policy is potentially placing on the waterways within this area – the waterways are identified in policy as part of the public realm, a focal point for cultural activity, with access routes alongside, and an important ecological resource. Bullet point 11 proposes the Lee Navigation as a venue for water sports facilities. Further thought should be given to the primary role of the waterways and how the various demands can be balanced. There is a similar concern in respect of the detail of Policy BG7 ‘Watercourses’.

Placemaking Rural Enfield PL8

The Strategic Policy ‘Rural Enfield – a leading destination in London’s National Park City’ is an interesting concept and the Authority would welcome the opportunity to engage with the Council on this topic and consider how the concept might align with the Regional Park. A process of collaborative working would be beneficial on matters such as visitor hubs, recreational routes and landscape scale habitat creation and connectivity.

The re-wilding aims of the policy are supported in principle as is the new cultural gateway hub proposal for Enfield Chase. The policy also includes proposals for improved hubs of sporting excellence at Tottenham Hotspur training ground and Ponders End (PL8 h) but does not mention the Athletics Centre at Pickett’s Lock. This site does not appear to be included within the placemaking policy designation and the Authority would question why this is the case? This is a key site within the Regional Park and would be a major asset to the London’s City Park and Rural Enfield designation.

Blue and Green Enfield

Strategic Policies BG1 and BG2

The Regional Park forms a significant part of the Borough’s blue and green infrastructure resource. Policy within this section is in general supported and references to the Regional Park welcome particularly where they identify measures to overcome issues of physical severance, inaccessibility and the fragmentation of spaces and habitats. In particular, Policy BG1 point 2 which refers to the prioritisation of a range of future blue-green interventions including expansion of routes into the Regional Park and new continuous and publicly accessible linear parks such as Brooks Park and Edmonton Marshes which are proposed as part of Meridian Water.

Reference to the “revitalisation of open spaces and leisure/recreational activities at Banbury Reservoir, Picketts Lock, Hotspur Way, Ponders End and Whitewebbs Park” under BG1 2.j. is also noted.

Policy BG2 Protecting Nature Conservation Sites includes a reference to the need for development involving over 100 new homes within 6km of the boundary of the Epping Forest SAC, (known as the “zone of influence”) to secure appropriate mitigation and avoidance measures in the form of strategic alternative nature green space (SANG) to offset any potential effects arising from increased recreational pressure and air pollution on the Epping Forest SAC. The LVRP and Pickett’s Lock are identified as locations for SANG mitigation in terms of recreational pressure.

The Authority’s officers would welcome further discussion on this point in due course; a similar discussion is underway with officers at Waltham Forest who are working on a SANGS SPD. It will be necessary to understand the implications of the HRA Report and its recommendations for revising policy to ensure “the Local Plan provides specific guidance on the circumstances in which SANG, developer contributions and/or project level HRA will be needed, and the quantities required” and that this is referenced in policy text (paragraph 6.10).

It will be important to identify appropriate sites within the Park to meet the requirements of SANG mitigation and understand what this will mean for the long term management in relation to the Authority’s venues and open spaces and delivery of the PDF proposals. The open spaces within the Regional Park, many of which are designated as part of the Lee Valley SPA, already face considerable recreational pressure from visitors and increased numbers of local residents, which makes their management for ecological objectives in accordance with these designations difficult.

Green Belt Policy and Pickett’s Lock

Most of the Park within Enfield is designated as Green Belt. It is noted that Pickett’s Lock has retained its description as a major developed site in the Green Belt containing ‘substantial areas of previously developed land’ (explanatory text para 6.5.5) under Policy BG5 ‘Green Belt and Edges of the Countryside/urban area’. This is welcome and links to the policy (BG5 2.) which allows for the partial or complete redevelopment of previously developed sites in accordance with restrictions in terms of the impact on the openness of the Green Belt and increases in traffic generation.

However, the draft Policies Map does not indicate the designated area of the Pickett’s Lock major developed site; there has previously been considerable debate between officers as to the area that might constitute previously developed land given the site’s planning history and the permanence of structures, hardstanding etc as part of the major developed site. However, the current draft Policies Map shows only the Site Allocation SA56 keyed on the map as ‘Preferred Option for Spatial Growth Sporting/Leisure’ and which covers a portion of the site relating to the car park and cinema and does not for example include the camp site, athletics centre or site of the previous leisure centre.

There should be a much greater emphasis within the Local Plan on the strategic importance and potential of Pickett’s Lock in the eastern part of the Borough. The Council is aware and indeed has been generally supportive of the Authority’s commitment to secure a major leisure investment in the site relating to the whole Pickett’s Lock site and which will require a site wide approach in planning terms. Following an initial Duty to Co-operate meeting the Authority would wish to discuss this point in further detail and it has been agreed that a revised site allocation for

Pickett's Lock will be provided that better reflects the Authority's ambitions for the site in accordance with the Park Development Framework Area Proposals and current joint working on The Wave London project. Likewise, Council officers will be advising on the 'missing' Policies Map notation for major developed sites in the Green Belt, which should apply to Pickett's Lock. The Authority may wish to comment further on this point in due course.

Other Blue Green Policy

The main thrust of Policy BG 7 Watercourses is supported; the aim to protect, enhance and maintain the quality of the network of watercourses. The requirement for development to incorporate suitable setbacks to protect the water's edge is endorsed; this will be important within the Meridian Water development and protecting the River Lee Navigation. The policy requirement for the siting of marinas and commercial/residential moorings away from the main course of the River Lee and Navigation is supported (Policy BG7 bullet point 3).

Policy BG8 Urban Greening and Biophilic Principles, which seeks to maximise opportunities to green the borough's urban and more rural environment, including the Regional Park is supported. As the Plan acknowledges measures such as green/brown roofs, living walls, trees and soft landscaping treatments, will have multiple environmental benefits for biodiversity, flood mitigation, urban cooling as well as improve the quality and aesthetic value of the area if appropriately implemented and maintained over time.

Design and Character

The detail of policy relating to Design and Character is welcomed. Policy DE5 Strategic and Local Views is supported. It identifies the long distance views out from the Park at Rammey Marsh across to the open countryside beyond the M25 as important. Similarly, a number of other views across the Park (and the Borough) from outside Enfield to the east are also identified. Policy seeks to ensure development positively contributes to the setting and integrity of these views as they make a significant contribution to the character and identity of the Borough. The protection and significance of views out from and across the Park are recognised in PDF Area Proposals particularly in relation to Rammey Marsh.

The Area of Special Character designation is retained across the majority of the Regional Park on the draft Policies Map; it also covers the Rural Enfield area (also the London National Park City area). Policy DE11 Landscape Design sets out the requirements for proposals within this designation and this detail is welcomed. It seeks to ensure landscape character and distinctiveness including its biodiversity, cultural value and tranquillity are restored, conserved and enhanced as part of development proposals.

Housing

Policy SP H1 Housing Development Sites identifies a list of sites to be allocated for housing development but it is noted that the site 'Pickett's Lock Lane' which the Authority submitted for potential residential development under the Call for Sites process has not been included. This has been raised with officers at Enfield and further discussion on this matter would be helpful.

Gypsy and Traveller accommodation requirements are to be considered as part of a separate Gypsy and Traveller Local Plan, DM H10. Officers would welcome involvement with this document if it is likely to impact land within the Park.

Economy

Draft Strategic Policy E1 Employment and Growth has identified two sites within the Park as suitable locations within the green belt for industrial and logistics development

- Rammey Marsh West, (SA52) part of which, 5.7ha is owned by the Authority and
- Land south of Rammey Marsh West (SA55) which lies to the north and west of Innova Park.

Site proformas presented for each are noted as is their status as policy indicating key requirements and considerations that need to be taken into account as sites come forward for development.

The Rammey Marsh West allocation was proposed by the Authority and is supported in principle. Including the land north of Innova Park offers an opportunity to look comprehensively at what can be achieved in this area and officers would wish to work closely with the Council on the master planning of this area of the Park to ensure the appropriate and sensitive redevelopment of the land. In this respect the Site proformas are lacking in detail and should address the location of both this site and SA55 in terms of the Regional Park and the comprehensive environmental, ecological, landscape and access improvements that would be required. Further information is also sought regarding the Green Belt status of these sites – it is understood Green Belt boundaries will be determined as part of the Reg 19 Local Plan process.

It would also be helpful to understand the policy requirements for the Rural Enfield Strategic Policy PL8 in terms of these site allocations. The inclusion of ecological enhancements within SA52 as part of its redevelopment would assist in strengthening the links between the Regional Park and Enfield Chase as part of the arc of open spaces identified.

Rural Enfield Chapter 11

There is a tendency for policy under this section of the Plan to overlap with other policy sections; for example between the development management policy DM RE1 'Character of the Green Belt and open countryside', the placemaking Strategic Policy PL8 'Rural Enfield, and Strategic Policy BG5 'Green Belt and edge of countryside/urban area' The Regional Park is part of the borough's Green Belt but can also be considered as part of the urban fringe given its proximity to the urban edge along the eastern side of the borough. It is unclear what Policy RE1 contributes to the Local Plan over and above the other two aforementioned policies.

However, the specific requirements included for new development set out in Policy RE2 'Improving access to the countryside and green corridors' are supported particularly those that give priority to

- improving public access to key attractions such as the Lee Valley Regional Park,
- creating interconnected routes that link with open spaces along river corridors, including the Lee Navigation, the London Loop and Lee Valley Walk and

- extending links and the right of access into the open countryside to facilitate the creation of a major green corridor from Lee Valley Regional Park to Enfield Chase (London National Park City designation PL8).

Culture Leisure and Recreation

Strategic Policy CL1 Promoting culture and creativity

The Local Plan recognises the contribution that the leisure and visitor experience can make to economic growth and this is welcomed. It is important that policy enables both the protection of existing facilities and the growth and expansion of new attractions. It would be helpful if both strategic and development management policies could offer more specific support for the Regional Park in this respect. Strategic Policy CL1 Promoting culture and creativity seeks to direct new arts, culture and entertainment towards the Borough's regeneration areas and town centres which is understandable given the accessibility of these locations. The Regional Park contains established venues and locations for leisure and entertainment and should also be identified as a suitable location, in particular the Lee Valley Leisure Complex, a strategic location within the east of the Borough.

Clarity is also sought in relation to Policy DM CL2 Leisure and Tourism. This supports proposals that will "continue to develop a high-quality visitor experience to increase the contribution that tourism, arts and cultural heritage and sport make to our quality of life and social well-being" in particular where these proposals "promote greater use of rural parts of Enfield and the Lee Valley as a leisure and recreational resource without harming local biodiversity or water quality". Reference to Lee Valley should be Lee Valley Regional Park.

Policy CL3 Visitor Accommodation

Policy CL3 Visitor Accommodation makes no reference to the Regional Park as a location for potential visitor accommodation facilities and yet these feature within a number of sites in the Park, including at Pickett's Lock. PDF Area proposals outline further opportunities for a range of provision across a wide range of accommodation types, and indeed hotel, glamping and lodge style accommodation is often an integral part of major leisure and sporting developments. It is being actively considered as part of The Wave proposals. Policy CL3 should be amended to include a reference to the Regional Park under CL3 point 4, (see text in red bold font).

*Proposals for camping facilities and the conversion of existing buildings to accommodate visitors in rural parts of Enfield will be supported especially within Enfield Chase **and the Lee Valley Regional Park** in line with policies RE4 and PL8*

Policy CL4 'Promoting Sporting Excellence

The first part of Policy CL4 'Promoting Sporting Excellence' supports development and investment decisions which will facilitate and contribute towards the development of first-class, publicly accessible, strategic sport and leisure facilities to meet the needs of the growing population, identifying Pickett's Lock/Lee Valley Leisure Complex as a priority location in this respect, (Policy CL4 bullet point 1.b.ii). This statement offers potential support for the Authority's current investment proposals for Pickett's Lock which include The Wave.

Site Allocation SA56 is referenced in the policy in respect of Pickett's Lock and this identifies 'Land at Pickett's Lock for new sports, leisure and recreation facilities. Unfortunately, the site area outlined identifies the cinema and adjacent land including

the car park only – an area of 6.5ha. The Authority would wish to see a much more extensive area included given the leisure and sporting activities across the wider site. It is also confusing that explanatory text to the policy groups together the Hotspur training ground, Pickett's Lock, Enfield Playing Fields and Firs Farm as suitable locations for the development of world-class sports villages – this is not a proposal that the Authority has identified for Pickett's Lock.

As mentioned above and in the initial Duty to Co-operate meeting, the Authority would welcome further detailed consideration of this policy and the Site Allocation to ensure it captures the full potential of the Pickett's Lock as a strategic site, reflects the correct area within the site allocation and provides support and guidance for future leisure development.

Delivering and Monitoring Section 15

Officers would welcome sight of the current version of the Infrastructure Delivery Plan accompanying the draft Local Plan and further discussion on its contents, particularly in relation to the priorities for funding identified under Policy SP D1. In the past relevant projects identified by the Authority and referenced in the PDF have been included and clearly this is an important mechanism going forward.

The Authority looks forward to engaging further with Borough officers on the matters raised above as part of the Duty to Co-operate process to help inform the next stage of the Local plan process.

Yours sincerely

Appendix A to Letter LVRPA Policy and Explanatory Text

Lee Valley Regional Park Policy

The Council will support the work of the Lee Valley Regional Park Authority to realise the full potential of the Regional Park in accordance with the Park Development Framework proposals and to deliver a diverse range of open green and blue spaces, habitats and ecological enhancements, major sporting and leisure venues and visitor attractions.

Explanatory Text

The Lee Valley Regional Park Authority (LVRPA) is a statutory authority created by the Lee Valley Regional Park Act 1966 (The Park Act). It has a statutory responsibility to either provide directly or work with partners to provide facilities for sport, recreation, leisure, entertainment and nature conservation throughout the Park. Section 14 (1) of the Park Act requires the Authority to prepare a plan setting out proposals for the future management and development of the Regional Park and riparian authorities such as Enfield are required to include those parts of the plan affecting their area within their own relevant planning strategies and policies (Section 14(2) 8 (a)) although inclusion does not infer that the planning authority necessarily agrees with them (Section 14(2) (b)).

The Park Development Framework Area Proposals are relevant in terms of Section 14 (2) of the Park Act and are formal statements of the Authority's position in respect of development within the Regional Park. Further, sections 14 (subsections 4-7) of the Park Act requires local planning authorities to consult with the LVRPA on applications for planning permission which they consider could affect the Park. Section 14 (subsections 8-9) allows the LVRPA to refer the decisions of the riparian authorities to the Secretary of State if it is considered by the LVRPA that the decision taken materially conflicts with the proposals of the Authority for the development of the Park.