

ID No.	Organisation name or individual	LCA Ref	Para no.	Consultee Comments	LVRPA Response	Proposed amendments
L LA4.0	Essex CC Spatial Planning			Draft Landscape Character Assessment and Landscape Strategy. ECC makes no comment on this document	Comment noted	No change
L LA5.0	Herts CC Environment & Infrastructure			Thank you for the opportunity to comment on the above. This letter relates to the services of the Environment & Infrastructure Department, which also incorporates other services provided by the county council where relevant. <u>Draft Landscape Character Assessment.</u> The approach to the Landscape Character Assessment (LCA) is fully supported.	Comment and Support welcomed	No change
L LA6.0	Enfield			<u>Draft Landscape Character Assessment and Landscape Strategy</u> Enfield welcome the robust and detailed work undertaken on Landscape Character Assessment and Strategy which reflects our understanding of the diverse and rich landscape characters to be found in the LVRP.	Comments noted and welcomed	No change
L LA6.1	Enfield	LCT B	4.4	<u>LCT B Urban valley floor with reservoirs and wetlands</u> It should be perhaps be noted that the reservoirs are hidden by the steep embankment and therefore limit public accessibility and enjoyment.	Comments noted. Amendments will be made to the text under paragraph 4.41 to cover the point raised.	Add the following text to paragraph 4.41 as follows: " <b>The steep embankments are a key feature in the landscape and create a physical and visual barrier to the reservoirs but they hide the reservoirs from view. They also create a barrier to public accessibility despite the fact that</b> <del>a</del> Although operational, parts of the reservoirs are <b>open</b> accessible to the public and are popular for informal recreation, particularly fishing and bird watching due to the populations of breeding and wintering birds <b>supported by</b> the water bodies support. <b>The complex known as Walthamstow Reservoirs has recently opened in Autumn 2017 up as Walthamstow Wetlands nature reserve.</b>
L LA6.2	Enfield	LCA C1		<u>LCA C1: Rammey Marsh</u> It would be useful to recognise the urban context which surrounds the site and in particular the local road network as well as the M25.	Comment noted. Both para 4.67 and 4.68 refer to the road network adjacent to Rammey Marsh including the M25 and the proximity of the business park and further industrial and commercial development beyond	No change

L LA6.3	Enfield	LCA D1		LCA D1: Lee Valley Athletic Centre & Ponders End Lake The assessment is supported and reflects our understanding of landscape character. The strategy should seek further enhancements where opportunities arise to soften hard landscape features which currently exist on the site.	Comments and proposed change noted. However there are sufficient suggestions included in the general text and guidelines which relate to this matter.	No change
L LA8.0	Tower Hamlets	LCA E4	4.11	East India Dock Basin The character assessment does not make any reference to the changing character of the area. Paragraph 4.11 notes that there are 'medium to large scale warehouses and sheds' to the east of the site, but it is not noted that work is currently underway to redevelop some of these sites into a high-density residential led mixed-use development (Leamouth Peninsula South, now referred to as Goodluck Hope). Another, more advanced, high-density residential led mixed-use development is emerging to the north (Leamouth Peninsula South, now referred to as City Island). These developments represent a general shift in the character of the area to a more residential-led mixed use one, albeit with some areas of industrial character remaining, such as the safeguarded Orchard Wharf.	Comments noted. LCA represents a snapshot in time so things will inevitably change following the publication of the study. Para 4.11 (now corrected as 4.137) already mentions an 'extensively urbanised area of residential and industrial development'. The proposed additional text on individual plots seems to place too much emphasis on the surrounding area of the LCA. Bullet 7 of key characteristics will be reworded instead:  - Dominated by Canary Wharf which forms a backdrop to the west and other modern high-rise development emerging to the north and east. (Note numbering repeats so this is 4.11 on page 149, now renumbered as 4.137)	Amend Key Characteristics so that 7th bullet reads as follows: " <b>Dominated by Canary Wharf which forms a backdrop to the west and other modern high-rise development emerging to the north and east, though well-treed boundaries soften influence of adjacent, smaller-scale development. . . Work is underway to redevelop some of these sites into a high-density residential led mixed-use development (Leamouth Peninsula South, now referred to as Goodluck Hope). Another, more advanced, high-density residential led mixed-use development is emerging to the north (Leamouth Peninsula South, now referred to as City Island). These developments represent a general shift in the character of the area to a more residential-led mixed use one, albeit with some areas of industrial character remaining, such as the safeguarded Orchard Wharf.</b> " Check the numbering of sections and amend.
L LA8.1	Tower Hamlets	LCA J2	4.77	Lee Navigation, Limehouse Cut and Hertford Union Canal Whilst the character assessment refers to the Limehouse Cut Conservation Area, it does not mention the Victoria Park and the Regents Canal conservation areas which are situated in the northern part of the borough. Furthermore, Victoria Park is a listed park on the Register of Historic Parks and Gardens for its special historic interest. All heritage assets should be acknowledged within the Park Development Plan as they mention the significance of the canals and towpaths. Other heritage assets such as grade II listed Lock Cottages and Canal Lock are missing from the assessment.	Comments noted (these refer to page 205 and para 4.204 onwards). These areas, Victoria Park and wider Regents Canal Conservation Areas are not part of the Regional Park, although they form an important context. Reference to the Victoria Park conservation area can be added under Key Characteristics.	Amend text under LCA J2 Key Characteristics 6th bullet point as follows: - The proximity of Victoria Park, <b>also a Conservation Area</b> , creates a more open and green setting to the canal.

L OA11.0	Historic England			Owing to capacity, we have not reviewed this document and do not provide any comments.	Noted	No change
L SR25.0	E17 Walthamstow Pumphouse Museum	L4	4.115	Although the above museum is not within the Park boundaries it is a significant attraction that is close to St James Park, the Black Path, and the Park. The museum is also very much part of the plans to celebrate the regions industrial heritage through the Lea Valley Heritage Alliance. The museum is also working with the London Borough of Waltham Forest to enhance the site, thus becoming an important heritage attraction within the Lea Valley. The museum would, therefore, like to see it added to any future plans and literature produced by the Lee Valley Park Authority. It would also like to see more signage pointing the way to the museum	Comments noted, text has been added under L4 St James's Park to reference the Museum. Para renumbered as 4.246.	<b>Note editing amendment to change heading to L4.</b> Add additional text at the end of para 4.246 as follows: "The boundaries to the northeast and west are formed by roads and fronted by residential areas, <b>and</b> a school, <b>and the E17 Walthamstow Pumphouse Museum, the latter a direct link to the Lea Valley's industrial heritage.</b> "
L SR26.0	Royal Gunpowder Mills Waltham Abbey Ltd			For clarity, there are two charities with responsibilities towards the site. The Waltham Abbey Royal Gunpowder Mills Charitable Foundation Ltd manages the endowment and is the freeholder. We are the Waltham Abbey Royal Gunpowder Mills Company Limited, and we hold a long lease and manage the site and its visitor attraction and activities. We welcome the direction of the LVRPA strategy, and note its new emphasis on conserving and enhancing the Park's historic environment.	Comments noted and welcomed	No change
L SR26.1	Royal Gunpowder Mills Waltham Abbey Ltd			We note that the Draft Landscape is the subject of a 2nd round of consultation. The Waltham Abbey Royal Gunpowder Mills Company is not aware of any submission by either the 'Foundation' or ourselves, the 'Company', to the 1st consultation of 2015.	Comment noted, this is the first round of consultation on the Landscape Strategy - but it has been combined with a second round of consultation on the Area proposals for the northern part of the Park.	No change
L SR26.2	Royal Gunpowder Mills Waltham Abbey Ltd	LCT E	4.115-4.120	LCT E: Valley Floor with Post-Industrial Parks The Royal Gunpowder Mills is identified in the Landscape Strategy as belonging to the landscape character type of Post-Industrial Park. We agree with the case made for this category of landscape from former industrial sites as being unique and distinctive for their intricate 'mosaic' habitats and connection to the past (4.115-4.119). We agree with your observation of a 'legible narrative' of the influence and story of the Park (4.120). We suggest there is a narrative of the origins of landscape itself in the Lee Valley through geology and history of land use which could be a permanent exhibition or talks and tours.	Comments noted and welcomed.	No change

L SR26.3	Royal Gunpowder Mills Waltham Abbey Ltd	LCA E1	4.122	Location and boundaries (4.122): We have mentioned in our attached document the amendment required to the maps to reflect the correct boundaries of the Royal Gunpowder Mills.	The boundaries for the Landscape Character Areas are based on mapping a range of information, field surveys and landscape characteristics so site boundaries in the draft Landscape Assessment and Strategy will not always match existing mapped boundaries. In this case LCA E1 Royal Gunpowder Mills does not include the southern most part of the site which is a residential area. However the mapping of the southern boundary does require a slight amendment to include land and buildings near the entrance to the site which are also shown as within the RGMs ownership. This will be amended in the Landscape document. Note new numbering for para reference is 4.121.	Amend LCA E1 to show additional land and buildings in the south of the site.
L SR26.4	Royal Gunpowder Mills Waltham Abbey Ltd	LCA E1	4.122	Key Characteristics (4.122): We agree with the key characteristics identified for the Royal Gunpowder Mills. The site is correctly noted as nationally and internationally important.	Comments noted and welcomed	No change
L SR26.5	Royal Gunpowder Mills Waltham Abbey Ltd	LCA E1		<i>Tranquil landscape with limited intrusion from roads and other sources of noise</i> (4.122). It is noted in several places in the consultation documents that a conflict arises throughout the Park between increased public access and tranquillity and wildlife. The Royal Gunpowder Mills requires sustainable income to conserve the historic fabric and this aim is envisaged by ourselves and many stakeholders as best achieved by leasing of parts of the site for commercial income, and extension of visitor activities. The level to which tranquillity is at risk depends upon the type of activity and its intensity. However, we firmly believe proactive management by ourselves will maintain the 'sense of seclusion and relative tranquillity' noted in your Landscape strategy guidelines. We would be interested in understanding more about your own approach to managing the conflict, the opportunity to participate in any workshops, or assist research.	Comments noted and welcomed. The Authority is seeking to agree a suite of strategic policies that will help ensure a balanced approach to encouraging more people to visit and use the Park whilst still retaining areas where people can enjoy a more tranquil setting and protected areas where wildlife will not be overly disturbed by visitor activities.	No change

L SR26.6	Royal Gunpowder Mills Waltham Abbey Ltd	LCA E1	4.125	Evaluation: Landscape quality and condition (4.125): contamination causes a large area of the site to be out-of-bounds to the public. This could be eased by installation of boardwalks and over the long term, phased remediation to enlarge the current very restricted 'free to roam' area the public can access freely.	Comments noted - the Landscape Strategy para 4.127 - now para 4.126 identifies the importance of developing opportunities to enable public enjoyment of the heritage and wildlife within the site in a safe and sensitive way. More site specific detail is provided in the draft Area proposals under 6.A.2. These highlight the need to explore opportunities to create new pedestrian and cycle links into the site and provide pedestrian access into the northern part of the site. A minor amendment is proposed to 6.A.4 Visitors to help address the point about internal access improvements.	Amend Area Proposal 6.A.2 Visitors to address this point as follows: "Explore options to create new pedestrian and cycle links into Royal Gunpowder Mills to improve access into <b>and within</b> the site for the general Park visitor and help integrate the site with the surrounding River Lee Country Park and nearby Lee Valley White Water Centre".
L SR26.7	Royal Gunpowder Mills Waltham Abbey Ltd	LCA E1	4.127	<u>Landscape strategy guidelines:</u> Manage change (4.127): We believe that carrying out the guidelines that are designed to protect the unique characteristics of the Royal Gunpowder Mills rests upon the ability of ourselves, our partners and stakeholders to manage change. Control is a necessary part of establishing long-term protection. We, the Waltham Abbey Royal Gunpowder Company Limited, favour a scheme of mixed-use development of businesses, bespoke retail, leisure and education, structured by subleases of our own long leasehold of the site. This would allow holistic management of heritage, nature and visitor activities, and tailoring of the development over the course of time to dovetail and achieve symbiosis with the evolving conservation of the site. This is best achieved working in conjunction with our partners and stakeholders.	Comments regarding the mixed-use scheme noted, however at this stage these proposals are speculative and lack detail and the guideline for managing change does not require amendment. Please note revised numbering para 4.127 now 4.126.	No change
L SR26.8	Royal Gunpowder Mills Waltham Abbey Ltd	LCA E1	4.127	Guidelines: <u>Bridges and access points</u> (4.127): In our view, successful development of the site would incorporate the ambitions for bridges and access points westwards and eastwards. This 'greater connectivity' will enable local and tourist connection. It will provide green routes to Network Rail and TFL stations. However success would also depend upon keeping the public away from the hazards of the site. Therefore we see such access as needing an 'engineering solution' allowing safe crossing by pedestrians and cyclists, controlling access into 'safe' areas only, and disallowing access beyond. In the North, currently in the 'out of bounds' area we hope a future visitor interpretation centre and facilities would come about in the long term.	Comments noted. These details will need to be discussed as and when comprehensive proposals for the site are brought forward. The Landscape guidelines identify the need for pedestrian bridge connections, sensitively located. Please note revised numbering para 4.127 now 4.126.	No change

L SR26.9	Royal Gunpowder Mills Waltham Abbey Ltd	LCA E1	4,127	Landscape integration at the urban edges to the southwest (4.127): We welcome this guideline. The Royal Gunpowder Mills has no 'street presence' at Highbridge Street, our single access point. This impacts detrimentally on the profile of this nationally and internationally important site. The boundary edges of the housing estate have various owners including the original developer and Epping Forest Council. We will be pleased to assist achievement of this guideline by working with yourselves, the landowners, residents and other stakeholders to create an inviting and pleasant access point from the street.	Comments noted and welcomed. Please note revised numbering para 4.127 now 4.126.	No change
L SR28.0	Markfield Beam Engine & Museum	LCA L2		LCA L2 Markfield Park denotes the significance of the Park as a gateway to the Lower Lee Valley. The proximity of MBEAM in this situation is highly significant for potential public access. Key characteristics set out about the Park, highlight: "Small urban park set with the site of the decommissioned Tottenham Sewage Works, that operated from the mid-18th Century to the 1960s - facilities in the north, including a children's play area and café - Open, flat floodplain, formerly Lammas Land, today comprising a single large open area of grassland framed by mature trees in the south -Historic use of the area as a Victorian Sewage Works evident in the fabric of the park in the north – area structured by remnants of the former concrete settlement tanks and filter beds, today reused as a series of walled community gardens, graffiti walls and a BMX track. Major features of the former works also include the original pump houses, one containing the recently restored Beam Pumping Engine (both Grade II listed)". As previously noted, the features of the former Sewage Works site are equally important as a heritage asset, & their continued neglect, is detrimental to the potential value to the public.	Comments noted. The London Borough of Haringey's Markfield Park Management Plan which is referred to in the Landscape Strategy, would set the framework for co-operative working with other stakeholders such as the Authority.	No change in response to comments but note minor edit to change LCA L2 Markfield Park to <b>L3</b> Markfield Park

L SR28.1	Markfield Beam Engine & Museum		4.109 4.110	<p>Paras 4.109 and 4.110 state: "Markfield Park provides a sense of openness in the townscape, and offers facilities for access and recreation which are valued by the local community as well as people accessing the tow path along the River Lee Navigation. The presence of the Engine Room Museum provides an important link to the heritage of the local area and the lower Lee. The focus should be on maintaining the valued qualities of the area, notably the sense of time-depth and openness, and connections to the Lee Valley, in terms of access and biodiversity." Whilst it is gratifying to have recognition in this form, the Trust would hope that practical and resource support will be provided to do more than just 'maintain' facilities, which really need significant support for enhancement and development. The Museum Trust remains available to liaise with the LVPA, and explore how support for MBEAM in line with the declared policy intentions can be made a reality.</p>	Comments noted and welcomed. Note revised paragraph numbering - this refers to 4.243 - 4.245.	No change
L GI35.0	Individual			<p>I understand from the Authority that the Landscape Character Assessment and Landscape Strategy is proposed as the final strategic Landscape blueprint and that no further specific landscape proposals are to be put forward by the Authority as part of its Park Plan. As expressed in the e-mail to me of 22nd May: <i>"The Landscape strategy and guidelines, as part of the PDF Proposals, along with other sources including the Biodiversity Action Plan and emerging proposals for venue development would be the starting point for project identification."</i> The LUC document serves well as a "starting point...for project identification" but falls far short of the strategy required as part of a "plan showing proposals for the future use and development of the park" (S14(1) Park Act) over the next 15-20 years.</p>	Comments noted	No change

LGI35.1	Individual		<p>This Strategy follows the wrong Model The Authority has explained (e-mail of 3rd May) that: "<i>The draft Landscape Character Assessment and Landscape Strategy follows the methodology set out in the guidance produced by Natural England in 2014. It aims to show consistency with surrounding authorities' Landscape Character Assessments (LCAs).</i>"</p> <p>I submit that the Natural England guidance is simply the wrong model for the purposes of the Park Plan. Para 1.3 of the Natural England guidance makes it perfectly clear what purpose LCAs are intended to serve: Landscape Character Assessment can be used to inform policy development; local, neighbourhood, community or parish plans, and place-making; green infrastructure plans and strategies ... [they provide] baseline evidence .. to inform a range of decisions. The Authority's role is clearly wholly different from the riparian authorities who have to form development management policies and practices serving a wide variety of objectives including housing &amp; economic development.</p>	<p>Comments noted. The Authority has followed professional advice in terms of the methodology and scope of the Landscape Strategy.</p>	No change
L GI35.2	Individual		<p>An LCA helps to inform a planning authority's plans and policies in balancing different objectives. The Authority by contrast has as its principal objective the transformational change – over time – of the park, "from wasteland to playground" and management and improvement of landscape is an essential part of its responsibilities. An LCA following the Natural England guidelines, provides a necessary baseline for a planning authority. The LUC document is also a perfectly acceptable intermediate document for the Authority to inform a range of decisions. But given its particular responsibilities the Authority needs to go much further and set out in its formal Plan what it intends to do, or at least hopes to do, over the Park Plan period.</p>	<p>The strategy should be read in conjunction with adopted and drafted Area Proposals. Landscape embraces a broad definition and many aspects are already being addressed. Adopted proposals included in Areas 1-5 include schemes drawn from the ALGG, ULV landscape strategy and the Walthamstow Marshes landscape proposals. These provide an adequate basis for identifying new schemes. More detailed work on their design reflecting e.g. the exigencies of ground conditions would follow if resources permit.</p>	No change



L GI35.3	Individual			<p><u>The Historical and Legal Context</u>                  It is a part of the Authority's principal duty to "improve the park as a place for the occupation of leisure" (Park Act S12.) The park is defined to mean the entirety of the Lee Valley Park shown on the statutory plan (Section 1(2)) and the Authority therefore has a duty to seek to improve the Park as a whole and to publish plans setting out how it intends to do so. The Park is intended to serve as a "green lung" and the Authority has on countless occasions expressed its desire to create such a green lung over time.</p>	Comments noted. The development and improvement of the parklands runs as a parallel strand to the development of the venues. These policies and proposals maintain this approach.	No Change
L GI35.4	Individual			There is a striking quote in Professor Travers book from Jim Sherry (the planner who led the 1986 Park Plan). <i>By the year 2001, Abercrombie's green wedge will finally have come to pass.</i> Mr Sherry issued this forecast at a time when the Park Authority was pursuing extensive plans to improve the open spaces of the Park. Over the period of the 1986 Park Plan the Authority embarked on the ambitious plan to forge most of the space between Waltham Abbey and Broxbourne into a Country Park. There were also extensive new acquisitions at Stanstead Abbots, and to the north of Nazeing. This programme has continued with reduced momentum in the period of the 2000 Park Plan when there have also been landscape initiatives to the south of the M25 including Gunpowder Park and Bow Creek and completion of work at the Essex Beds nature reserve.	Comments noted	No Change
L GI35.5	Individual			As things stand, the Authority has done a good job of improving the open spaces to the north of Waltham Abbey. The Country Park; the water spaces to the north of Dobbs Weir, and the Amwell reserve in particular are all very satisfying open spaces. There remain some pockets of unsatisfactory landscape (particularly around Broxbourne) but the Park Authority is generally to be congratulated on what it has achieved in the open spaces in the northern part of the Park.	Comments welcomed	No Change

L GI35.6	Individual		<p>South of the M25 the position is much less satisfactory. I would classify the shortcomings into three main categories:</p> <ul style="list-style-type: none"> <li>• Some of the open spaces owned and managed by the Authority, including Gunpowder Park, Rammey Marsh and Tottenham Marsh are managed very cheaply and without any real ambition to create an attractive “playground” for Londoners. I appreciate that these spaces have their supporters and there have been some positive biodiversity outcomes such as the flourishing of orchids in Rammey Marsh. But none of these spaces feels particularly cherished (in the way that the Country Park clearly does) and the Authority should have ambitions to make these spaces more cherished, more visited and more attractive.</li> </ul> <p><i>continued below</i></p>	<p>Comments noted. Investment and management within the south of the Park has been ongoing, with an obvious focus on the major Olympic Legacy facilities and surrounding parklands. These changes have resulted in considerable change to the benefit of the whole of the Lower Lee Valley. The extent of land in the Regional Park north of the M25 motorway reflects the configuration of the statutory boundary which in turn reflects the opportunities for the Authority to purchase land. Furthermore, the proximity of several million people makes access and control critical when the delicate balance between nature and access to nature can be extremely difficult to manage, for reference the example of Walthamstow Wetlands where it is understood Natural England have concerns about disturbance to wetland birds due to the impact of visitors.</p>	No change
L GI35.7	Individual		<ul style="list-style-type: none"> <li>• Much of the landscape remains scrappy and unresolved and in places simply squalid. The eastern margins are particularly unattractive in many places including areas adjacent to Banbury Reservoir and the Lea Bridge Riding stables. The Authority’s ambitions to create a signature for the Park should include plans, which need not be ambitious or expensive, to improve these deficient landscapes.</li> <li>• Perhaps most importantly, contiguous open spaces have not been joined to create a place to wander as they have been in the Country Park. The park at its southern end remains a patchwork of largely separated open spaces with no legibility as a playground for Londoners.</li> </ul>	<p>Comments noted, please refer to the response at L GI35.6.</p>	No change

L GI35.8	Individual		<p>Given that that present Park Plan is likely to run until around 2040, it should spell out ambitions to improve the landscape of the southern part of the park. The Draft strategy wholly fails to do this – it contains innumerable “guidelines” but contains no commitment to carry any of them into effect: no programme, no priorities, and no desired projects. It is simply a starting point for project identification which may or may not take place over the ensuing 20 years. Many of the guidelines replicate guidelines expressed in previous landscape strategy documents in the past, in the 1986 and 2000 Park Plans, and in the Area Proposals in the present emerging Park Plan. Simply to repeat guidelines at regular intervals over the decades, without any programme to identify priorities or put them into effect, devalues the Park Authority’s aspirations.</p>	Please refer to the response at L GI35.6.	No change
L GI35.9	Individual		<p><u>A Project-Led Approach</u>                  Section 14 requires the Authority to have a current plan showing proposals for future use and development of the park. The “park”, as I have already mentioned, means the entirety of the Lee Valley Park and a plan, according to its dictionary definition, means “a detailed proposal for doing or achieving something, an intention or decision about what one is going to do”.                  Clearly, the Park Authority does not have the resources or the practical ability either to bring every acre of the park into “park compliant” use or to transform the landscape of every parcel of land. In the context of a 15-20 year plan what it can – and should – do is identify landscape projects which it desires to achieve, either by its own agency or by giving practical support to other landowners and planning authorities. Because there is so much to be done, I submit that most projects selected should be in the southern half of the Park.</p>	Please refer to the response at L GI35.6.	No change

L GI35.10	Individual		<p>The Upper Lee Valley Landscape Strategy (ULVLS) &amp; Walthamstow Marshes Landscape Design Framework (WMF) represent a perfect template for this project-led approach. Both identify numerous clearly delineated projects for improving landscape &amp; connectivity. Both documents have been effectively abandoned by the Authority. The ULVLS was commissioned by Ms Jajjee under the auspices of the North London Strategic Alliance &amp; it is hugely to Ms Jajjee's credit that she brought about a 'coalition of the willing', including all the riparian authorities &amp; statutory undertakers, who signed up to the ULVLS as an agenda for improvement of the "Upper Lee Valley" (Hackney Marsh to the M25). Aside from the Walthamstow Wetlands (which I will return to in a moment) the Authority to my knowledge has taken no steps to advance any projects identified in the ULVLS; made no reference to the ULVLS in its Area 3-5 proposals, nor adopted any ULVLS projects as part of its current Park Plan proposals. In the case of the WMF, the Authority launched a consultation (led by Mr Cairns) only to abandon the consultation without taking any steps to achieve any of the WMF projects.</p>	<p>Comments noted. A number of the projects outlined in the ULVLS informed the detail of or were incorporated as part of the Area Proposals in the southern half of the Park. Please also refer to the response at L GI35.6.</p>	No change
L GI35.11	Individual		<p>In eschewing any project identification, the Authority leaves itself with no specific declared ambitions for landscape at all. It is all very well to say that the strategy will provide a basis for project identification in the future but the Plan should disclose the Authority's ambitions and priorities, even when these cannot be expressed as firm commitments. That is what a Plan is for! Moreover, by identifying desired projects within the draft Park Plan; and putting that plan out for wide consultation, the Authority gives those projects added weight and authority – and it should not be overlooked that the Park Plan still has some weight in the development management policies and decisions of the riparian boroughs.</p>	<p>The adopted and draft area proposals provide sufficient detail on the Authority's intention. Priorities are identified through the business planning process</p>	No change

L GI35.12	Individual		<p><u>The Importance of the Walthamstow Wetlands – and a proposal</u></p> <p>The Wetlands are an excellent project albeit one which was taken up personally from the ULVLS by Ms Jaijee and ultimately carried forward due principally to the support of Waltham Forest Council, Thames Water and the Heritage Lottery Fund. The Wetlands project has achieved something that I and others have called for over the years. The Coppermill Gate links the Wetlands to Walthamstow Marshes to the south and beyond; the Lockwood Gate links to Tottenham Marshes (and beyond) to the north. These two gates have created a continuum of open space. As a resident in Hackney I can inform the Authority that it has transformed many residents' perception of the Lee Valley – and generated animation and movement of people into previously undiscovered spaces.</p>	<p>Comments noted. The Authority initiated and has supported the Partnership with funds. It commissioned the original options study in 2008 that looked at the reservoirs and their potential as a visitor destination. The Authority has fully supported the Wetlands Project and the adopted PDF proposals within Area 3 have promoted improved pedestrian and cycle access to ensure the wetlands area is connected into the rest of the Regional Park, its linear routes and the green infrastructure in the surrounding area. It is an exemplar of the Authority's enabling role.</p>	No change
L GI35.13	Individual		<p>The Authority's ambition for the next 15-20 years should be to build upon this remarkable start by identifying further projects which could help weld this part of the Lee Valley into one connected space. These projects might include:</p> <ul style="list-style-type: none"> <li>• A link between Low Hall Sports Ground and Walthamstow Marsh</li> <li>• A link from Markfield Park to the Wetlands</li> <li>• A link from the Wetlands towards Stonebridge Lock</li> <li>• A link from the Wetlands to Douglas Eyre playing fields and beyond to Blackhorse Road</li> <li>• A link from the former pitch and putt course to Hackney Marsh</li> <li>• A project to use parts of the flood relief channel to improve connectivity</li> </ul> <p>With vision and ambition it would be possible over time to create a southern Country Park to go with the excellent park that now exists further to the north. Alongside these connectivity projects, the Park Authority could support plans to improve landscape in areas where it is currently deficient, such as Folly Lane and Low Hall.</p>	<p>Comments noted - these are access projects a number of which have been pursued but with little success at this stage due to land ownership issues and the cost of implementation. Most are however included as part of the PDF Area Proposals. Landscape work on part of Folly Lane Triangle is being actioned by LB of Waltham Forest at Cheney Row funded by developer contributions. The Authority has supported these proposals but does not own land in this area to support the creation of a southern Country Park.</p>	No change

L GI35.14	Individual		<p>A 15-20 year plan, building on the momentum created by the Wetlands, is the correct place to articulate these proposals. The Park Authority clearly cannot commit to achieving every desired outcome but it can set out a direction of travel, expressing how the Authority intends to continue the journey from Wasteland to Playground. Furthermore, adopting such plans provides leadership to others, which is what the Authority should be offering. Riparian authorities can be brought onside, funding opportunities (as at Walthamstow Wetlands) can be pursued. Conversely, a policy of remaining silent will be construed as a vacuum of intention encouraging developers and riparian authorities to come forward with development projects encroaching on the valley.</p>	<p>Comments noted. The Authority's Area Proposals identify key projects for the next 10 - 15 years</p>	No Change
L GI35.15	Individual		<p><u>Where to go from here?</u>                  The consultation on the Landscape Strategy Document provides no effective scope for consultees to have a say on what should be the Authority's landscape programme and priorities over the next 15-20 years. It offers an opportunity to comment on landscape character but not to comment on landscape plans. Indeed it is wholly unclear how, or whether, the Authority would consult upon or validate any landscape plans over the next 15-20 years. The consultation around this document will simply provide no basis for identifying priorities at all. I strongly question whether this consultation meets the Authority's duties to consult under S14 (1) of the Park Act.                  As an individual consultee, I obviously can have no expectation that the Authority will necessarily agree with my views about specific projects. However, I and other consultees surely have a right to understand what the Authority is actually planning to do.</p>	<p>These matters have been addressed in earlier comments above.</p>	No change

L GI35.16	Individual		<p>I submit that the Authority need to rethink how it is going to formulate and consult upon its landscape priorities over the next 15-20 years. It should engage in meaningful consultation with riparian councils, statutory undertakers, interested national bodies such as Natural England, and with individuals and groups who have expressed an interest in this subject.</p> <p>It should articulate its landscape vision, encourage creative debate, and seek to recreate the coalition of the willing which came together to form the ULVLS. Emerging from this debate there should be specific projects for further consultation. In that way, there will be genuine consultation and debate about how the Park intends to improve the park as a place for the occupation of leisure.</p>	Please refer to the response above	No change
L GI35.17	Individual		<p>I am not making any comments on the LUC document. I agree with a majority of its contents both as to character, and as to guidelines. I feel that commenting on points where I take a slightly different view would be a sterile exercise as I cannot practically see how the cycle of comment and response on this document will practically take forward the discussion of what the Authority actually intends to do over the next 15-20 years.</p>	Noted	No Change
L GI35.18	Individual		<p><u>A vacuum of intention is not acceptable</u>  This document does not commit the Authority actually to do anything to improve landscape over the next 15-20 years. If this is the final landscape document and the Authority in fact identifies no or negligible landscape projects over the period then the Authority will have committed no act or omission which puts it in breach of the Park Plan. This is not acceptable. The Authority has a duty (I apologise for the repetition) to improve the park as a place for the occupation of leisure – emphasis added. It has a duty to come forward with plans and proposals and it has an urgent necessity to do so. To improve the landscape, to make it known, peopled, cherished and animated, offers the Park the best protection against development pressures. I believe the priority should be in the south because of the deficiencies I have identified; in particular the lack of legibility and connectivity, and because of the rich opportunities available to make the park into a better place.</p>	The Authority is cogniscent of its 'duties' and is currently delivering an extensive programme of change across the Regional Park in line with business priorities	No change

L GI35.19	Individual		<p><u>Appendix: A Note on the Strategic Landscape Vision ("SLV") and Landscape Assessment ("LA") published by the Authority in 1995 preceding the 2000 Park Plan</u></p> <p>I submit that the SLV and the LA, which appear to be the corresponding documents in the 2000 Plan Review process express a clear appreciation that Landscape Character Assessment should be base documents and not the final document. The SLV expresses the view (Page 19) that Landscape should be placed at the heart of the Park Plan. I would particularly draw attention to the following from the SLV: <i>"The Lee Valley Regional Park is currently undertaking a Park plan Review and the Strategic Landscape Vision detailed here will feed into Part 1 and 2 of this Review. In addition the park Authority is also developing a number of initiatives..."</i> (page38)</p>	<p>Both these old documents reflected the professional guidance available at that time. The draft Landscape Strategy reflects current good practice and guidance recommended by Natural England and was prepared by 2 chartered members of the Institute of Landscape Design.</p>	<p><b>No change.</b> Additional text added to the section on Methodology para 2.3 as follows:  <b>The landscape Strategy was prepared by Chartered members of the Landscape Institute.</b></p>
L GI35.20	Individual		<p><i>The Strategic Landscape Vision needs to be underpinned by:</i></p> <ul style="list-style-type: none"> <li>- <i>adequate budgets for kandscape development and maintenance</i></li> <li>- <i>new funding opportunities forhte landscape e.g. Lottery and European funds</i></li> <li>- <i>a strong and early role for landscape archtects to develop and influence master plans.</i></li> <li>- <i>the development of specific high profile Action Sites</i></li> <li>- <i>an action programme for incidental sites to upgrade landscape quality</i></li> <li>- <i>the implementation of initiatives to bring landowners on board with the regeneration of the Park's landscape - "ensure your landscape contrinbutes tothe Park".</i> Page 39</li> </ul>	<p>Please refer to the above response</p>	<p>No change</p>
L GI35.21	Individual		<p><i>For the Vision to have practical effect, the principles and ideas embedded within it must be followed, step by step, down the implementation chain - from land use planning decisions through development briefs and design guidelines to detailed design, implementation and management. Experience shows that unless there is <u>single-minded commitment</u> tothe essence of the Vision, and attention to detail at every stgae, hopes and aspirations will remain unrealised. The Vision, therefore is <u>just the beginning</u> of a process which can deliver exciting and innovative development in the quality of the Park's landscape for years to come</i> (Conclusion page 41)</p>	<p>Please Refer to comments included at L. G3519</p>	<p>No change</p>



L GI35.22	Individual			By contrast there is no expression in the current strategy document of any follow on programme needed to turn analysis into practical action to improve the quality of the Park Landscape.	Please refer to the coments above	No change
L GI36.0	Save Lea Marshes			For your Consultation on the Park Development Framework you have invited comments on the Draft Landscape Character Assessment and Landscape Strategy. The following comments are made on behalf of Save Lea Marshes ( <a href="http://www.saveleamarshes.org.uk">www.saveleamarshes.org.uk</a> ).	Comments noted	No change
L GI36.1	Save Lea Marshes			The main concern of Save Lea Marshes is over what the LVRPA is intending to do in the areas under its control over the next several years. The Landscape Strategy would appear to be a set of aspirations, that provide, in the sections headed "Guidelines", the only clues as to what these intentions might be. There are a total of 225 bullet points in these sections. For the most part, these are either instructions: "Continue positive management of..", "Maintain and enhance the diversity of" etc.; or normative statements: "Any proposed future development should", "Any future road improvement work should...", etc. But a large number of the instructions are prefaced with words like "Seek to .." or "Take opportunities to", which have the effect of weakening their force considerably. Seek occurs 65 times, opportunities 44 times, & consider occurs 15 times (but of course some of these occur together, as in "Seek opportunities to" However, even instructions that are not watered down in this way are themselves pretty un-focussed: "Encourage greater opportunities for recreation...", "Maintain and enhance the quality", "Conserve the openness ". There's nothing specific about how any of this might be achieved.	In the absence of a dedicated line within the capital programme for open space and landscape projects the delivery of proposals is increasingly reliant on sn 106 or through the release of capital through land sales. Within the overarching context of the Landscape strategy and the strategic policies, schemes will be delivered but not a on a 'programmed' basis.	No change
L GI36.2	Save Lea Marshes			The word development occurs 75 times, often in conjunction with such phrases as "within or adjacent to the Park". Such a high number of occurrences is presumably a reflection of how prevalent the threat of development is. In most cases the concern about development is merely for its visual consequences: "Open skylines ... are sensitive to development...", "development which may alter the skyline...", "Screen and soften views of development...", "Ensure ... development ... respects the important views..." There is little suggestion that development per se is undesirable.	Comments noted. The word 'development' is used in its generic sense in most instances. Guidelines are issued in relation to the Park and the impact or opportunities provided by development. Within the context of a growth corridor some development around the Regional Park is inevitable.	No change

L GI36.3	Save Lea Marshes			The next most commonly occurring words are landscape (64), habitat (37) and trees (28), all worthy subjects of concern.	Comments noted	No change
L GI36.4	Save Lea Marshes			And then come connections (27), connectivity (23) and access (22). The authors seem to have an obsession with this subject. It really covers two different things: connections from outside the Park, and connections within the Park. The former is particularly associated with the phrase "surrounding communities" (communities occurs 20 times, and surrounding 18 times). There is no clear explanation of why it is desirable to make the Park more accessible from outside. Surely the more people there are in the Park, the greater the harm to the ecology, and the less attractive the Park becomes to those people who are already in the Park. And if the intention is to make the Park more accessible to motorists, that is even worse. Regarding the other type of connection – within the Park – there seems no objection. For example, the proposal to connect Low Hall to Walthamstow Marshes and the Waterworks Centre to Leyton Marsh both seem sensible.	Improving access to the Park, both physically and visually is important as there are a number of barriers to pedestrian and cycle access into the Park and movement through and within the parklands. Wider access and the opening up of new areas would provide new parkland and open space to explore and reduce the burden on existing 'hot spots' or honey pots where there is concern that visitor pressure can impact on the landscape, ecology and general amenity of the Park. A number of these new connections will only be achieved through partnership working and agreement from a range of other landowners and authorities. Hence the terminology 'to seek' or 'encourage'. There is no intention to make the Park more accessible to motorists.	No change
L GI36.5	Save Lea Marshes			As mentioned above, there is a serious lack of specifics in the document. I wonder if this may be partly due to inadequate inspection of the locations, as illustrated by the following two examples. a. One guideline mentions connectivity between Douglas Eyre Playing Fields and Blackhorse Road. The authors seem to be unaware that there already is a short path between the NE corner of the Playing Field and Hawarden Road, at the end of which there is (or was until very recently) a gate which has been kept padlocked for about the last ten years. b. A guideline for the area of the Lee Navigation and Hertford Union Canal is to "Encourage greater use of canal towpaths". One wonders when if ever the authors visited this area. At weekends, especially in summer, the towpaths are already full to capacity with pedestrians and cyclists. This guideline cannot be taken seriously. The document does not mention that National Cycle Route 1 passes along this section of the Lee Navigation towpath.	Comments noted. In respect of point a) - this gate was locked 30 years ago and there was only controlled access via the Warner Estate. In respect of point b) the text will be amended to take account of the route of the NCN Route 1 and the considerable movement along this route.	Amend the 'Key Characteristics text under J2 'Lee Navigation, Limehouse Cut and Hertford Union Canal' as follows: 7th bullet point - Popular and busy access route for pedestrians and cyclists with physical and visual connections with the Olympic Park <b>including the National Cycle Network Route 1 at Hackney Wick. The National Cycle Network (NCN) Route 1 joins into the Park via the Hertford Union Canal towpath at Hackney Wick.</b> Amend Guidelines third bullet point as follows: <b>Encourage greater use of Improve the safety of access along</b> canal towpaths through better gateway features and signage.

L GI36.6	Save Lea Marshes			<p>The document needs the attention of a subeditor. It may be claimed that this version is only a "draft", but that would be an inadequate excuse: the document has been released to the public for consultation, so at the very least it should have undergone a spell check. There are many spelling errors; the paragraph numbering goes awry at the page numbered 138; some of the internal references are invalid; some of the Character Areas on the page numbered 12 are incorrectly labelled; there are some absurdities in the Glossary (who needs a glossary to understand the meanings of words like rarity and remnant, and what is the relevance of Bracknell Forest Borough?); there are duplications in the Bibliography; and Appendix 3 is missing.</p>	<p>Appendix 3 is a sample survey sheet. Comments noted - numbering and other minor editing will be undertaken before the final version is issued. The Glossary provides information about a range of terms not all will be familiar to everyone and some meanings are particular to landscape assessment processes and methodologies.</p>	<p>Numbering and minor edits will be undertaken throughout and a survey sample sheet added to Appendix 3.</p>