

Mr Paul Hudson
National Infrastructure Directorate
Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Email: cmartin@leevalleypark.org.uk
Direct Dial: 01992 709885

6th April 2016

Dear Mr Hudson

RE: Application by North London Waste Authority for an Order Granting Development Consent for the North London Heat and Power Project

**Response to Written Question 4.3 by Lee Valley Regional Park Authority
Registration No. 10031942**

Please find below the Lee Valley Regional Park Authority's response to **Question 4.3. "Please provide the Authority's views about the impact of the proposed Temporary Laydown Area construction site on the operation of this part of the Regional Park, and the extent to which the proposal is acceptable to the Authority."**

The Temporary Laydown area forms part of the Regional Park, and lies within the Lea Valley SMINC adjacent to the Chingford Reservoirs SSSI. It forms part of Thames Water's land ownership south of William Girling Reservoir, which also includes the Camden Plant operation, originally permitted on a temporary basis. It is not therefore managed by the Authority or available for public recreation.

However this area is an important component in the continuity of the Regional Park, its openness, and ecological connectivity, particularly given the fragmentation and disturbance caused by road crossings and adjacent industrial activities and land use. In particular its ecological value, as part of the Lea Valley SMINC is important in the context of the wider valley; it contributes to the network of interconnected wildlife sites and corridors within the Regional Park including those of national importance such as the Chingford and the Walthamstow Reservoirs SSSIs and those of international importance - the Lee Valley SPA.

The restoration and enhancement of this area of green belt has been a long held aim of the LVRPA, and current plan proposals as set out in the Park Development Framework Area 4 Proposals (adopted April 2013, please refer to Appendix C to the

LVRPA's Written Representation for further detail) seek a comprehensive restoration scheme across land on both sides of the North Circular including habitat creation and enhancement to strengthen ecological connectivity, provision of new facilities for public access to enable people to enjoy the wildlife and an exploration of options for more active recreational and leisure use of the area.

Integral to these proposals is a need for partnership and joint working with the London Borough of Enfield, Thames Water and other stakeholders in order to achieve the level of change required. The London Borough of Enfield's Meridian Water Masterplan 2013 (and the more recent Proposed Submission Central Leaside AAP 2014) identifies the Temporary Laydown Area as recreational open space and compensatory flood storage required as part of the Meridian Water development. The LVRPA's proposals are supportive of the Masterplan concept for land within the Park; it is hoped this will provide the vehicle to restore and open up this area of the Park.

Given the LVRPA's proposals and long held position regarding this area of the Regional Park concerns were raised during the second round of consultation over the creation of a laydown area outside the 'envelope' of the existing site and within the Park, particularly given the timescales involved (the compound would be in use for 7 to 9 years), disturbance to and loss of part of the Lea Valley SMINC and the disruption to Park users, principally those using footpaths and cycle routes in the vicinity, e.g. NCR1. It was felt that the existing EcoPark site had significant open areas where the compound could be located and an explanation was sought for the current off site location. A specific request was made to the NLWA to consider transferring the laydown area into the central area of the EcoPark site as the existing Energy to Waste transfer station was demolished, thus enabling the off-site laydown area to be returned to open space as soon as possible.

The NLWA acknowledged (letter dated 12 October and attached as appendix A below) the loss of the Laydown Area as open space during construction and demolition works but also confirmed that there was insufficient space on the EcoPark site for a laydown area and this was the case throughout the duration of the works. NLWA also confirmed that the lease being sought from Thames Water for use of this area includes the restoration, landscaping and management of the land prior to surrender.

The LVRPA has therefore proceeded in its discussions with the NLWA on the basis that if the Temporary Laydown Area has to be located in the Park on Thames Water land then consideration should be given to the overall strategy for the future reinstatement and ecological enhancement of the site and its design for use as recreation and flood alleviation purposes both as part of the Meridian Water development and as part of the Regional Park. This would be compatible with the Park Authority's Area Proposals for this section of the Regional Park.

To assist with future plans and reinstatement proposals the LVRPA provided general advice on planting and habitat creation within the Laydown Area appropriate to the Lea Valley SMINC, and this is reflected in current documentation and indicative

plans submitted with the DCO¹. The Environmental Commitments & Mitigation Schedule AD06.03 includes a commitment to “reinstate with the creation of a meadow and planting scrub and scattered trees around the perimeter”. Ecological commitments also include additional native species planting as appropriate and sowing of wildflower meadow mix.

The point made in the LVRPA’s written representation concerns the wish to see, at the outset, as much detailed information as possible on the landscape treatment and reinstatement plans for the Temporary Laydown Area, given its location within the Park and the Lea Valley SMINC and the need to meet future requirements of the Meridian Water Masterplan. The LVRPA has also sought an amendment to Schedule 2 requirements (3) to (5), (10) to (12) and (15) to ensure that there is specific reference to consultation with the Lee Valley Regional Park Authority as part of the LPA approval process for the requirements on detailed matters. This would ensure that the LVRPA is involved in the future reinstatement of the Temporary Laydown Area.

Yours sincerely

Claire Martin

**Policy Officer
Lee Valley Regional Park Authority**

¹ The Design Code Principles AD02.02 include a general guideline for Zone 7 ‘Temporary Laydown Area’ with indicative hard and soft landscape works shown on Plans D_007 and 008. Section 6.10.5 (page 127) of the Design and Access Statement AD05.07 also provides additional information stating that the “area would be reinstated in a way that allows opportunities for its potential future use” and that “the area would be restored to its current open scrub nature with enhancement”

Appendix A Letter dated 12 October 2015 from NLWA

Stephen Wilkinson
Head of Planning & Strategic Partnerships
Lee Valley River Park Authority
Bulls Cross
Enfield
London EN2 9HG

swilkinson@leevalleypark.org.uk

**North London
Waste Authority**

Unit 1B
Beral House
25 Ashley Road
Tottenham Hale
London N17 9LJ

T 020 8489 5730

E post@nlwa.gov.uk

W nlwa.gov.uk

wiseuptowaste.org.uk

12th October 2015

Dear Stephen

Thank you for your letter of 2 October addressed to David Beadle, updating the Phase Two consultation response that we received in June. The comments we received in your initial letter have been taken into account, and if you would like to see how they were responded to, I can refer you to the draft Consultation Report which was considered by the Authority at its meeting on 25 September (section 6 sets out Phase 2 Consultation comments and responses) at <http://www.nlwa.gov.uk/governance-and-accountability/authority-meetings/2015/reports-from-meeting-of-25-09-2015>

As you note in the letters, there have been ongoing discussions between yourselves and us since the end of Phase Two Consultation, and I thought it might be helpful to set out where we believe those discussions currently stand.

Property matters

The Development Consent Order will provide for compulsory acquisition of the part of Lee Park Way which runs from Advent Way to the proposed new access point into the EcoPark, crossing the River Lee Navigation. LVRPA are content in principle for a long term use to be agreed, and this is reflected in draft Heads of Terms which you are considering.

Landscaping

Landscaping proposals have been sent to you (Stephen Roberts) and we have your views on this. We anticipate being able to reach agreement on the nature of landscaping which reflects the Park Authority's aspirations and requirements for the area, and also reflects our environmental assessments. We are at present consulting Thames Water on the proposal preferred by LVRPA, to as a large portion of the relevant land is in their ownership.

Maintenance and security

Subject to the detail of any agreement, in principle appropriate security patrols and CCTV can be agreed, together with management of graffiti, flytipping, and litter management. Euston Ling's email of 12 August to Stephen Roberts refers.

Signage

You have supplied your signage guidelines which would be taken into account in any sign design, in particular wayfinding design. LB Enfield are also concerned to ensure that there is effective wayfinding signage for the site, and we will therefore consider any proposals with them also at the detailed design stage.

Road/bridge surface maintenance

We are expecting that when you respond with comments on the draft Heads of Terms, you will also supply title details relating to land ownership of Lee Park Way and the bridge. Agreement will be included in the documentation regarding surface maintenance.

With regard to your consultation response, we have discussed the issues you have raised with you in meetings, and you are aware that the proposal now shows EcoPark house as two rather than three storey. We have the following comments on the additional points made by the Park Authority Members:

- We acknowledge that the use of the Laydown Area during construction and demolition works means that it will not be open space in that time. We have included this area in the DCO application as there is insufficient space on the EcoPark site for this requirement, and this is the case throughout the works, as the last element of work is the demolition of the existing EfW. It may, however, be of help to know that the lease we are seeking from Thames for use of this area covers only the period which we have calculated as necessary for the works to be carried out including its restoration, landscaping, and management prior to surrender.
- We have been in contact with Sustrans during the preparation of this application, and would expect to continue to discuss proposals with them.
- The measure to be put in place for property management of Lee Park Way would be included in the documentation to be agreed between us, as set out in headline terms above.

My understanding is that at present we are waiting to hear further from you, with comments from your lawyers on the draft heads of terms. As soon as those comments are received, we will instruct our lawyers to prepare documentation, and will suggest a further meeting at that point to take matters further.

Kind regards



Ursula Taylor
Head of Legal & Governance