

New Lammas Lands Defence Committee



c/o Hornbeam Environmental Centre, 458 Hoe Street, Leyton Green, London E17 9AH

Chairman: Mr. Joseph Ward **Co-Chair and Planning Liaison Officer:** Ms. Katy Andrews
Vice-chair: Mr. Laurie Wortley **Co-vice-chair and Membership Secretary:** Ms. Cath Rasbash
Hon. Secretary: Mr. Chris Hill **Treasurer:** Mr. John Gilbert

Planning Control Department,
Sycamore House,
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Attn: Ms. Terunesh McKoy,
Development Control Officer.
e-mail: Terunesh.McKoy@walthamforest.gov.uk

29th December 2011

Dear Sirs,

re: LBWF Planning Application No: 2011/1560
Formation of temporary basketball venue at Leyton Marsh E10 7QL
(former Lammas Lands on northern part of Leyton Marshes).

I write on behalf of the New Lammas Lands Defence Committee, a local interest group based in Waltham Forest which also draws membership from the Borough of Hackney, regarding the above Application. Our group represents the interests of local residents of the Lower Lea Valley concerned with maintaining the green and open character of, and our continuing free access to, all the local former Lammas Lands of Hackney, Leyton and Walthamstow Marshes.

We are particularly concerned with preserving the precious and historically fascinating Lammas Lands of Leyton Marshes - Marsh Lane Fields being vested in the Borough of Waltham Forest (the successor to the Leyton Urban District Council) under the 1905 Leyton Corporation Act, and almost all of the rest having been acquired, through Compulsory Purchase, by the Lee Valley Regional Park Authority.

This Planning Application is from "London 2012" (originally submitted for validation by Ove Arup on behalf of the Olympics Delivery Authority) for "formation of a temporary basketball training venue comprising two 11 metre (34 feet) high modular court buildings, tented reception facility, access road, drop off area, car park, plant storage containers, perimeter fencing in association with the 2012 Olympic and Paralympic Games, between 1st March 2012 and 15th October 2012" - a period of some 7-8 months over the Spring and Summer, including construction and remediation periods.

Whilst this may be only "temporary" in Planning terms, it is a sufficiently long time to deprive local people of a whole Spring and Summer of enjoyment of one of the few pieces of informal recreational open land not so far directly affected by the baleful impact of the Olympic Games. Perhaps even more importantly, it would be in place during the whole of a year's breeding season for birds and animals, and so would have vast consequences for local wildlife and biodiversity which would be anything but temporary - and in the case of some bat species could, due to the serious detrimental effects of external lighting so close to the river, completely wipe out local populations, which would represent a permanent situation of species loss.

We believe that, in view of the long-term nature of the proposed "temporary" facility and the profound detrimental environmental impact that it would have during the entire breeding season for birds and other wildlife, a full Environmental Impact Assessment Study should have been required prior to Validation of the application (which was done on the 29th November 2011) so that its findings could inform Officers' recommendations as to refusal or granting of planning permission.

We hereby write to object to the above Planning Application on grounds of loss of open space on a green-field site, loss of public amenity and access to recreational open space for an entire summer at least, detriment to the semi-rural landscape character and views on the Lea Valley Marshes, and potentially severe LONG-TERM detriment to biodiversity and wildlife in what is one of London's largest and longest "green corridors," within a Regional Park that was established to protect and enhance the natural environment of the Lea Valley.

NLLDC DEMAND THAT THE PRESENT APPLICATION BE WITHDRAWN IMMEDIATELY pending a full Environmental Impact Assessment Study being carried out by the Applicant, and should only be re-submitted with a comprehensive Environmental Statement. This has been required of the ODA elsewhere for short-term and temporary events, *e.g.* Greenwich Park, and Leyton Marshes should be treated at least equally, particularly as the site is within a Regional Park and very close to an extensive Nature Reserve. The views of Natural England should also be sought, particularly with regard to the impact of lighting.

We oppose this Application in any event on the following grounds:

- 1. Loss of Open Space; Loss of Amenity and Public Access** for the period of the proposed facility (contrary to policies in the WF Unitary Development Plan and emerging Local Development Framework; and in the Lee Valley Regional Park Authority's existing Park Plan and emerging Park Development Framework; and in the London Plan, particularly Chapter 7 on local natural spaces, biodiversity and access to nature, and the Blue Ribbon Network; and we believe is also almost certainly contrary to the provisions of the Open Spaces Act and other legislation affecting the quantum of land that can be built upon in an area of Metropolitan Open Space).

In addition to the fact that this Application is contrary to just about every piece of Planning Guidance and legislation that we can think of, the New Lammas Lands Defence Committee object in principle to the fencing off of any area of Leyton Marshes, which are former Lammas Lands, whether temporarily or not.

Lammas grazing rights on Leyton Marshes were voluntarily given up by the Parishioners of Leyton (at a well-attended Public Meeting at Leyton Town Hall in January 1905) in exchange for a covenant, enshrined by Act of Parliament (still in force at Marsh Lane Fields), that the lands would remain green open space with the right to free public access in perpetuity for the purposes of recreation and relaxation.

Although the covenant was negated by the Compulsory Purchase of this part of Leyton Marshes by the Lee Valley Regional Park Authority in the 1970s, the Lammas Lands Defence Committee continues to press for the spirit of the original agreement to be adhered to and for full and free public access to be maintained over all of the former Lammas Lands of Leyton and Walthamstow Marshes.

The proposed footprint of the basketball training venue site is even larger - nearly twice the size - of the existing unsightly ice-rink building nearby, and is completely unacceptable in the semi-rural setting of Porter's Field. No structure of this size, bulk and visually dominating appearance should be permitted for any reason on Metropolitan Open Land in an open setting within a Regional Park, at a riverside location, whether permanent or temporary.

Certainly it would be unthinkable to grant permission for a permanent structure of this nature in this setting; yet the so-called "temporary" use proposed is for longer than an entire Summer and it would inevitably have severe detrimental effects on the amenity value of the field as an informal open recreational space and on local wildlife, and for this reason we oppose this proposed development and urge that it be refused planning permission under Delegated Powers.

2. **Detriment to Landscape Character and views** across Leyton and Walthamstow Marshes (contrary to policies in the WF Unitary Development Plan and emerging Local Development Framework, and in the Lee Valley Regional Park Authority's existing Park Plan and emerging Park Development Framework, and in the London Plan) by virtue of the excessive bulk and height and the appearance of the proposed structure, and the height and appearance of the proposed associated perimeter security fencing and floodlighting.

The bulk, scale and height of the proposed temporary training venue would be visually intrusive, and it would be surrounded also by intimidating 12ft high security fencing and floodlighting (and presumably CCTV towers) which would give the facility an imposing and forbidding feel and appearance. The building would stick out like a sore thumb when viewed from all directions - the Lower Lea Valley is wide and generally flat, the land at Porter's Field here is already elevated above the natural level of the remaining marshlands, and also the flat land of the Walthamstow Levels on the eastern side of the Lea Valley, delimited by the Dagenham Brook, continues for another mile eastwards almost as far as St. Saviour's Church in Markhouse Road (the spire of which is clearly visible at present from the Riverside Close river frontage). Local residents in Clapton are therefore also opposed to the proposed development, which would be within yards of their homes, for reasons of its appearance and size, and the consequent loss of amenity and views across the fields and marshlands in Waltham Forest. For this reason also, we oppose this Application and urge that it be refused planning permission.

We are also concerned at proposals for turning Sandy Lane into a road. In the mid-1990s Waltham Forest's Planning Committee refused permission for the Lee Valley Regional Park Authority to use black tarmac as hard standing around the vehicular entrance from Coppermill Lane into the Springfield Marina, on the grounds that "the use of black tarmac would be inappropriate in the semi-rural setting of the Walthamstow Marshes Nature Reserve." Black tarmac has also been opposed by the Regional Park Authority in other cases, including the recent improvements to Sandy Lane and the installation of the national Sustrans route that runs through Walthamstow and Leyton Marshes on the line of the former aqueduct. NLLDC are completely opposed to the use of black tarmac in the widening of Sandy Lane were this Application not to be withdrawn.

The proposed training venue buildings would be contrary to the landscape policies contained within the Lee Valley Regional Park's 'Strategic Policy Framework':

Objective LS4.1 (Sustainability) of the Park Plan seeks to "recognise the Regional Park's open spaces and green landscapes as a finite resource to be protected from inappropriate development." This should surely include nominally temporary developments, particularly when that temporary use is for nearly a year during the growing season, as opposed to a marquee or similar erection for a short-term event.

Policy LS1.2 states that proposals for development or changes of land use within or on the boundary of the Regional Park should not act to the detriment of the landscape and its amenity value; should be sensitive to its landscape setting in terms of location, scale, design and materials; and should respect and contribute to positive landscape character, retaining existing features where appropriate.

We suggest that despite the Regional Park Authority having raised no objections (and indeed being the landowner), this Application is in fact completely contrary to the Lee Valley Regional Park Act 1967 regarding the Park Authority's responsibilities towards the Lee Valley Regional Park, the requirements of which it was set up to implement and which the London Borough of Waltham Forest are required (Section 14) to take cognisance of in reaching a decision on this Application.

The requirements of the Lee Valley Regional Park Act to establish and maintain an integrated Regional Park for nature conservation and public enjoyment and recreation - and the preservation of the Lee Valley Regional Park as a large, integrated green open space and a precious environmental resource for all to enjoy - should take precedence over the short-term acquiescence of the unelected and unaccountable Regional Park Authority which is entrusted with carrying out its provisions, and would point out that under Section 14 of the Lee Valley Regional Park Act the Borough as a riparian planning authority is required to have regard to the provisions and obligations of the Act, no matter what the views of the Park Authority itself. As such, this present Planning Application must be rejected by Waltham Forest.

- 3. Severe detriment to Biodiversity and Wildlife** (contrary to policies in the WF Biodiversity Action Plan, Unitary Development Plan and the emerging Local Development Framework, and in the Lee Valley Regional Park Authority's existing Park Plan and emerging Park Development Framework, and in the London Plan, and was contrary to PPS9 of national policy planning guidance though there may have been recent changes to this, and contrary to several European directives on environmental conservation, wildlife and biodiversity), by virtue of the length of time the structure would be in place, its bulk and large size and appearance, and the associated security lighting.

Whilst able to be described as "temporary" in planning terms, the proposed buildings and surrounding security fencing and floodlighting would be in place long enough to be devastating in terms of wildlife and biodiversity in the immediate area, and could have a very severe detrimental impact in the longer term upon the wildlife and biodiversity of the much larger surrounding area of open land on Leyton Marshes within the Regional Park.

The Lee Valley Regional Park Act charges the Regional Park Authority with **maintaining and enhancing the natural environment and biodiversity in the Lea Valley**, and the Borough as the planning authority for this part of the Lee Valley Regional Park also has a duty to uphold that Act. The proposed buildings are completely at variance with the requirement to maintain and enhance the natural environment and biodiversity within the Regional Park and for this reason, and the fact that the applicant has failed to supply an Environmental Statement in accordance with European legislation, we urge that this application be refused planning permission.

The whole of the Lea Valley marshes, according to the WF Biodiversity Action Plan 2010-2020 (page 6), is of international importance. In addition, the Lea Valley Marshes have also been designated as a Special Protection Area (SPA) for birds and a Special Area of Conservation (SAC). Walthamstow Marsh, which begins at the line of black poplar trees just to the north of the site on the Parish Boundary, is a Nature Reserve, Site of Importance for Nature Conservation and Site of Special Scientific Interest (SSSI) and is therefore supposed to be legally protected from damage through development.

The whole of Waltham Forest is also supposed to be treated as an **Integrated Biodiversity Delivery Area**, the only London Borough to enjoy this status. The central tenet of English Nature's IBDA designation is that biodiversity should be looked at in a broad, landscape-scale context, in which case it is the whole of the Lower Lea Valley marshes that should be regarded as the setting for the proposed 3-storey development, and not simply the immediate surroundings of Porter's Field and the River Lee Navigation.

The intention of an IBDA is to maintain the extent of all habitats covered by the Biodiversity Action Plan - it is unclear to us how the proposed erection of a large basketball training facility for an entire breeding season could possibly be acceptable under the requirements of Natural England for IBDA's.

The Porter's Field area of Leyton Marshes, whilst not itself benefiting from specific nature conservation protected status (although surrounded by the M071 SINC), nonetheless forms an important and irreplaceable part of a large natural wildlife corridor along the Lower Lea Valley, which Natural England intends will become part of a regional "Thames and Tributaries" Integrated Biodiversity Delivery Area. It is an integral part of the extensive Regional Park stretching the length of the Lea Valley from the Thames to Ware, all the open spaces of which are to some extent protected by that status.

Construction of any building in this environmentally precious landscape area should be resisted - and particularly the type of building proposed for this site, in view of its size, height, external lighting, proximity to the Lee Navigation banks (a major part of London's Blue Ribbon Network and an important wildlife corridor in its own right) - whether or not the use is claimed to be temporary in planning terms. It is NLLDC's view that **the length of time and the seasons, in terms of wildlife and biodiversity impact, that it would be in place make such a proposal completely unacceptable.**

The proposed "temporary" period of use would extend across a whole year's nesting and breeding season, and could interfere with seasonal migration routes, within an extensive area of major importance as a green, open wildlife corridor and a foraging ground between several areas of recognised high biodiversity and nature conservation value within an Integrated Biodiversity Delivery Area landscape, including three Nature Reserves which are also Sites of Importance for Nature Conservation (SINCs) and Special Protection Areas (SPAs) - Essex and Middlesex former filtering beds, which are bird sanctuaries close nearby, and the adjacent Walthamstow Marshes.

Yet **no** Environmental Statement is included in this Planning Application documentation, not even a limited desk survey (despite the fact that previous surveys of the area appear to have been undertaken in the not-too-distant past). This is completely unacceptable, and furthermore we believe is probably illegal under European legislation, given the environmental sensitivity and amenity value of the site and its natural surroundings and its close proximity to wildlife sanctuaries and rare marshlands with national and European protected status.

Due to the location of this Greenfield site (which has never before had any structure upon it of this proposed size or for any length of time since King Alfred drained the marshes) and the long period of time requested for this large and obtrusive, albeit in planning terms "temporary," proposed basket-ball training venue, we believe a full Environmental Impact Assessment Study should have been required to be carried out, particularly with regard to bats - Serotines, Noctules, common and soprano Pipistrelles and Daubenton's bats (which specialise in hunting above water) are all known to be present in the area as well as along the River Lee Navigation and the nearby flood relief channel and tidal River Lea.

Other marker species such as stag beetles, water-voles, great crested newts, vipers and grass snakes are also believed to be present in the vicinity of the proposed site, as well as several other important protected and priority species of birds, mammals, amphibians and invertebrates.

Our main concerns with regard to wildlife and biodiversity issues are:

- a. The **impact of re-routing access** around rather than across and through Porter's Field for members of the public, their horses and especially their dogs, to avoid the site; and particularly the impact of this increased footfall in a more limited area than at present. We are concerned especially about the impact upon-
- skylarks & other ground-nesting birds, found especially in the rough meadow-grass to the north, south and east, which is long in the Spring and Summer; there would be increased disturbance to nesting sites and vulnerability to attack by dogs;
 - birds such as sparrows, and other protected and priority species, which rely heavily for food on the seeds and insects to be found in the rough meadow-grass around Porter's Field;
 - grass snakes, particularly in the meadow-grass near the Sustrans route path to the east (where vipers have also twice reportedly been seen recently);
 - newts, water-voles and other river-bank dwelling creatures near the navigation towpath (particularly were the towpath to be "improved" to allow full access during hard-surfacing and post-Olympic reinstatement of Sandy Lane).

The proposal to force local residents to use the perimeter of this informal recreational area of Porter's Field would inevitably lead to an unacceptable intensification of use in the nearby areas of rougher grassland which are of vital importance for ground-nesting birds such as skylarks, as well as snakes and a wide variety of invertebrates, including several nationally, regionally and locally rare species of bees, wasps, beetles and butterflies.

The Regional Park Authority, despite the general WF Borough by-laws regarding dog-walking, does not impose any restrictions in this area. The Waltham Forest by-laws require that all dogs being walked must be kept under close control at all times and if more than four dogs are being walked then all must be kept on leads at all times. Yet there is nothing in the Application to suggest that the Park Authority would be required to uphold the Borough's by-law legislation for the duration of the proposed use, to minimise possible harm to birds and other wildlife in these sensitive environmental areas on the perimeter of Porter's Field. This problem has not been considered at all.

- b. The **loss of a large recreational area of Porter's Field as an open wildlife corridor** between the open spaces and nature reserves to the south of Lea Bridge Road and Walthamstow Marshes Nature Reserve, particularly for nocturnal creatures, as detailed above;
- c. The **impact of exterior floodlighting and security measures upon bats and other nocturnal species** of birds and mammals, with potentially severe consequences for local wildlife and a disproportionate impact on foraging bats, especially Daubenton's Bats which are specially adapted for hunting prey over water - the surface of the River Lee Navigation is reflective of light, which in many nearby locations (such as by the new Latham's development) is already at levels blinding to these delicate little creatures and impairs their ability to hunt successfully.

Porter's Field is at a higher elevation than Walthamstow Marshes, and therefore there is a strong possibility that light spillage would also affect the Walthamstow Marshes Nature Reserve. We therefore insist that Natural England should be consulted specifically upon this point before a decision to approve or reject this Application is made.

NLLDC are of the firm belief that, given the high ecological importance of the field itself and the adjacent marsh habitat of Walthamstow Marshes Nature Reserve, **this Planning Application requires a full Environmental Impact Assessment Study to be carried out under the European Union’s Environmental Impact Assessment (EIA) Directive (85/33/EC as amended by 97/11/EC)**, to assess the impact of the proposed temporary facility on the nearby SPAs, SSSIs and PSNCIs and not just the impact on the immediate site itself and the surrounding river-banks and rough grassland. A **comprehensive Environmental Statement** must be provided before any decision is made as to whether to grant or refuse planning permission, giving a detailed assessment of the possible effects of the proposed development upon the River Lee Navigation and its riparian environment, and particularly upon the open spaces and marshland surrounding the site and the flora and fauna that depend upon the biodiversity of this area during the growing season. Not to do so would be illegal.

We do not agree with Ms. McKoy’s assertion (verbally over the telephone just prior to our meeting at Sycamore House on 06.12.2011) that no Environmental Statement was required as the use is said to be “temporary.” A full Environmental Impact Assessment Study definitely should be required, even for a temporary use - and in other locations, such as Greenwich Park, where an Environmental Impact Assessment has recently been required for a temporary event, the ODA/LOCOG have readily complied with the requirement.

Indeed, we demand that the present Application be withdrawn pending an EIAS being carried out by the Applicant, and that a comprehensive Environmental Statement must be included if and when any future Planning Application is re-submitted.

In 2001 planning applications (2001/1886 and 2001/1894) were made to LB Hackney for redevelopment as housing of the former James Latham plc timber yard site, on the Clapton side of the River Lee Navigation. Responding to LB Hackney’s consultation, Waltham Forest’s Planning Officers required a full Environmental Impact Assessment of the development’s effects on Leyton and Walthamstow Marshes (and also asked for consideration to be given to any likely effects on the Walthamstow Reservoirs Special Protection Area).

We therefore suggest it would be inconsistent of Waltham Forest not to make the same requirement in the case of the present application, which is proposed for precisely the site opposite Latham’s for which LBWF demanded that Hackney order the applicant to carry out an EIAS (which we believe they did - Hackney’s Planning Committee turned the application down, and the developer lost a subsequent Appeal to the Planning Inspectorate; but unfortunately the ODPM overturned both decisions and granted planning permission, to the fury of Clapton Riverside residents and NLLDC).

4. Inadequate safeguards against continuation of use for built structures.

Finally, we are extremely concerned (in view of previous similar experience) about **the possibility that any “temporary” permission of use could be extended indefinitely until made permanent** through a Certificate of Lawfulness of Use.

This very same scenario has just happened, only a few weeks ago, with a block of five stables constructed without Planning Permission at the Regional Park Authority’s adjacent Lee Valley Riding Centre. The Regional Park Authority only applied retrospectively for Planning Permission after the London Borough of Waltham Forest’s Planning Department had been referred to the Local Government Ombudsman for allowing the illegal development to take place and for failing to respond to complaints in time to demand removal of the illegal structures before the four-year period was up after which the Regional Park Authority could

apply retrospectively for a Certificate of Lawfulness. Which they did, and it was granted before the Ombudsman's decision came in.

A few years ago a large temporary marquee was erected, without planning permission, just south of this location over Christmas and New Year by the Kingsway International Christian Church. This caused quite considerable environmental damage to the area and much anger amongst local residents of Clapton Riverside. An undertaking was subsequently given by the Lee Valley Regional Park Authority that such a thing would never happen again.

Yet, despite this promise, the Regional Park Authority do not seem to be opposing this Application, which involves two modular basketball court buildings that would each be far larger and higher than a marquee tent and would be in place for several months, as opposed to a couple of weeks, with no exchange land being offered in mitigation and with obvious detriment to the enjoyment and amenity of local residents and all marsh users (and of wildlife, where the effects would be much longer-lasting as the entire breeding season and migrations would be disrupted).

At my meeting with Terunesh McKoy on 6th December she confirmed to me that once a temporary structure is erected it is possible to apply for a further temporary continuation of use for up to 18 months, and that this process could continue indefinitely, and should it do so for four years a Certificate of Lawfulness could then be applied for, thereby essentially making the "temporary" structure permanent.

There is nothing to suggest that this could not and would not happen in this instance. The ODA, who were the original Applicant, will be novating the contract to LOCOG in June or July, and in turn they could hand the facility on to the OPLC, who could quite easily pass it on again to the Lee Valley Regional Park Authority - and there would be nothing to stop any of those organisations from applying for an extension of the originally "temporary" use.

In view of this concern - and our deep lack of trust, based on past form, in the promises of either the London 2012 Olympic Games organising bodies or the Lee Valley Regional Park Authority - we oppose this development and doubt that its "temporary" usage would be enforceable. We therefore strongly urge that it be refused planning permission.

CONCLUSION

This application is deeply unpopular with local residents in the Clapton Riverside area and with users of the Marshes in general, and we believe that:-

in planning terms it fails to meet the requirements of current European Directives on the natural environment (as the length of time and the seasons during which it would be in place would be severely detrimental to local wildlife and the ecology of the surrounding Regional Park area and adjacent Walthamstow Marshes Nature Reserve),

that, whether "temporary" or not, it is contrary to current and emerging national legislation on Greenfield as opposed to Brownfield Site development,

that it does not comply with national and regional planning guidance or Open Spaces legislation, that it would be contrary to the LBWF BAP, UDP and emerging Local Development Framework in terms of protection of green open space and the encouragement of outdoor recreation for human mental and physical health,

that it is at complete variance with the spirit and letter of the Leyton Corporation Act 1905 which covenanted the Lammas Grazing lands,

that it is at variance with the Lee Valley Regional Park Act 1967 and at variance with the Lee Valley Regional Park's current Park Plan (which the Borough of Waltham Forest is legally obliged to uphold on Planning Applications within the Lee Valley Regional Park),

that with respect to Metropolitan Open Land and Green Belt land it is contrary to the planning guidance and requirements of the London Plan,
that the temporary nature of any permission granted would be unenforceable,
and that the surrounding Metropolitan Open Land and proximity of Waltham-stow Marshes Nature Reserve is of sufficient regional importance to warrant a full EIAS being carried out prior to any recommendation being made, in the event that the Application is not withdrawn.

We naturally hope that this Application will be withdrawn.

Should it not be withdrawn, then NLLDC urge that it be turned down under Delegated Powers, as it does not comply with local, regional, national or European legislation, or planning guidance with regard to development on Greenfield Sites on Metropolitan Open Land within a Regional Park; and it is within 120 metres of a Nature Reserve with European designation, yet the Applicant has not provided an Environmental Statement (as clearly required under European legislation, which also applies to temporary uses where these could have a profound detrimental environmental or biodiversity impact).

Additionally, as a riparian planning authority the Borough has a duty to uphold the Lee Valley Regional Park Act 1967, and the proposal is clearly contrary to the letter and spirit of that Act (as well as at variance with the Regional Park Authority's own Park Plan and emerging Park Development Framework).

If Planning Permission were to be granted by the LBWF in the absence of a full Environmental Impact Assessment Study and comprehensive Environmental Statement, as we believe to be required under European legislation, and contrary to the provisions of the Lee Valley Regional Park Act, then the New Lammas Lands Defence Committee give notice that - on behalf of all local residents and users of the area and the Parishioners of Leyton - we will consider taking such decision to the Local Government Ombudsman as a complaint of maladministration (the question of Judicial Review may also be raised by affected parties). However, we hope that the Application will in fact be withdrawn, or turned down under delegated powers.

Please keep us informed as to the progress of this application.

Yours faithfully,

Ms. Katy Andrews, BA, MSc,
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