

When a public body consults with the public about detailed and specific proposals, it is frequently a sign that it has already made its mind up. The current so-called 'consultation' on proposals to build a secure children's home at the Thames Water site in Lea Bridge is surely a case in point.

The object of the proposal is clear: the construction of a home to house up to 24 London children whose emotional needs are of such complexity that they require secure accommodation for the protection of themselves and others. The identity – and accountability – of the entity carrying out the consultation is less so. The "project team" is defined as the Association of London Directors of Children's Services; London Innovation and Improvement Alliance; and the London Borough of Barnet which is "currently leading the design and construction phase on behalf of London boroughs". According to coverage in the specialist press a "jointly owned [by whom?] not-for-profit company" will deliver the project and the Department for Education (DfE), which has previously purchased the site, will fund it. Simon Parry, who describes himself in his LinkedIn profile as "Project Manager Capital Delivery Growth and Corporate" at the London Borough of Barnet identified himself at the consultation event as the project leader for this scheme.

Let us be clear about some things to start with. Much as we would wish it otherwise, there is a need for a secure children's facility in London. There are currently no such homes in Greater London and children with the most acute needs are being regularly shipped off to remote homes, mostly in the North West, where they become institutionalised and cut off from their families. That needs to change.

Further, the Lea Bridge site is, in a sense, a plausible site. It is situated away from neighbouring residencies, it can be tucked out of sight, and it has arguably reasonable (although not great) accessibility for public transport, which is important if are to be made to children re to be kept in touch with their birth families. And the site is already owned by the DfE, which paid a ludicrously inflated price for the site to house its still-born Free Schools project.

The scheme itself has clearly been well-designed and thought through. The consultation shows detailed design proposals based on the template of existing secure children's homes. The proposals have, according to Mr Parry, been the subject of discussion with Waltham Forest Council since the summer of 2023 and have been successfully kept under wraps until the consultation was announced in January. The developers (whoever they are) have taken great care to take their plans to an advanced stage before canvassing public opinion.

But the huge and gaping lacuna in this consultation is precisely how this site has been selected over other prospective sites for what will be a 'Pan-London' facility. Clearly each of the thirty-two London boroughs desires such a facility to exist in London, whilst at the same time heartily wishing it somewhere else to avoid antagonising their neighbouring residents or impinging on its own cherished Green Belt. London has quite a lot of Green Belt: 22% of Greater London is classified as Green Belt, mostly in a few outer London Boroughs such as Barnet, which weighs in at 28%. Another 10% in London (8% in Barnet) is classified as Metropolitan Open Land. So why choose this particular site, which is not only Metropolitan

Open Land but also part of the Lee Valley Regional Park – the country’s only Regional Park - designated to provide open space to serve the whole London region?

It is at this point that the consultation becomes extremely coy. According to the consultation panels

... an assessment was undertaken as part of the site selection process. This assessment considered the context and location of multiple sites around London for a new secure children’s home. The assessment was based on a series of specific criteria and concluded that the site on Lea Bridge Road is the **only** suitable location in terms of meeting these criteria.” [*Emphasis added*].

I asked Mr Parry who made this assessment and he replied that it was “an independent company”. Would the consultants explain who this company was, what was their brief and what were their criteria? Mr Parry replied that this would be outlined in the planning application to be made to Waltham Forest Council in due course. That however is open to the objection that, if and when the application comes to Waltham Forest as the planning authority, the councillors will be precluded from considering the availability and suitability of alternative sites; they will be constrained to consider only the proposal before them. Therefore, I asked Mr Parry whether consideration would be given to relaying this information now. Mr Parry directed me to make that request to the (unidentified) consulting entity through their website; I have not received (and do not expect) a reply.

That brings us to a rather important question. Whether a site is suitable depends inter alia, surely, on what alternative uses exist for the site. The Thames Water site is the site proposed for the remarkable East London Waterworks Park – a project to restore the filter beds which occupied this site until the 1980s as a series of water spaces designed for open air swimming and conservation. “Remarkable” for the vision and professionalism of the charity promoting it; for the support and resonance it has achieved with a huge range of supporters (who have donated over £½million to buy the land and fund detailed engineering and feasibility studies); and for its consistency with the objectives of the Lee Valley Regional Park. It is a popular “bottom up” project which will garner public support and enthusiasm in a way which “top down” mega-projects like the vast ice rink across the road can never hope to do.

It is unclear whether or not the shadowy team behind the children’s home project were aware of, let alone took account of this alternative scheme for the site, or the extent of the support behind it. The consultation event lasted one half day and was conducted in a tiny meeting room in the Lee Valley Ice Centre (with an advertised capacity of just twenty people). If the developers were unaware of East London Waterworks Park before this event they certainly are not now. The room was packed with angry supporters of the project, who made their views known to Mr Parry and the PR team present and are no doubt completing consultation forms to make their views known.

Will this response make a difference? The consultants say that they:

intend to host another round of public pre-application consultation soon, to share updated proposals, responses to this round of consultation and to collate your feedback, prior to submitting our planning application to the London Borough of Waltham Forest.

The tenor of this undertaking and the assertion that this site has been identified as “the only suitable location” lead one to suspect that the consultation responses will be airbrushed put of the way, no doubt with the help of smooth prose drafted by the consultation team.

Before things proceed down this intended course, democratic accountability requires all concerned to get behind the assertion that this is the only suitable location. To take a case in point, Barnet Council, leading this project, owns a vast wedge of Green Belt land in a triangle between Mill Hill, Barnet and Arkley. It is pleasant open land, rolling country criss-crossed by Rights of Way and it would be a pity (obviously) to give any of it up. But it is generally not at all intensively used; it’s mostly undesignated open space. And there are no proposals there to create popular public usage – nothing to compare remotely with the East London Waterways Park. It is not hugely well-served by public transport but there are two Tube stations – Mill Hill East and Woodside Park - quite close by. And there are other Outer London sites, surely, which might be suitable including (for instance) open land in Redbridge served by stations on the Hainault Loop of the Central Line. No doubt each possible site is open to some form of objection, but to exclude consideration of any other site by the wholly unsupported assertion (going by this consultation at any rate) that they are all “unsuitable” will not do in any genuine and meaningful public consultation.

We do not know at this stage how – if at all – the Lee Valley Regional Park Authority will respond. The Authority has a Park Plan which can be viewed at <https://www.leevalleypark.org.uk/park-development-framework>. Its proposals for this area (referred to as Area 2) state that the Authority will:

Work with Thames Water, London Borough of Waltham Forest and other stakeholders to identify options for a development at the Thames Water Depot site that will bring this site into a Park compatible use.

The plans continue by stating that:

The type, scale and design of any development would need to be appropriate in term of the sites designation as Metropolitan Open Land and its location within the heart of the Regional Park. Development or use of the site would be expected to support and complement existing leisure and nature conservation activity and facilities in the area.

And that:

Development of the site which is not appropriate under the terms of the Park Act 1966 and the Park Authority’s remit and does not accord with the proposals set out in the Park Development Framework will be resisted.

These are not – or should not be – empty words. The planning framework established by the Lee Valley Regional Park Act which states that:

Local planning authorities shall ... include in their development plans ... such part of [the Park Plan] as relates to their area". (Lee Valley Regional Park Act 1966 Section 14(2)).

And although spatial planning frameworks have been much altered since the Park Act came into effect, that will be an important consideration for Waltham Forest Council if a planning application comes before that.

And it is encouraging (one hopes) that Waltham Forest gave due emphasis to the protection of Metropolitan Open Land and the Regional Park when they turned down proposals for two Free Schools on this site in 2019.

One wonders how the developers and the (unnamed) independent company took all of this into account when identifying this as the "only suitable site".

What will happen now is unclear. The present consultation has no stated closing date (I have asked for clarification of this point but have received no reply) and I have no doubt the progenitors of this scheme intend to plough on whatever the tenor and the extent of the consultation responses. Before that happens, there needs to be a **genuine and informed consultation** and this we have so far not seen.