



Canal &
River Trust

27 March 2015

London Borough of Haringey
Strategic Planning
6th Floor
River Park House
London
N22 8HQ

Dear Local Plan Team,

Re: Publication of the Development Management Policies Consultation Document

Thank you for your consultation in respect of the above.

The Trust is a company limited by guarantee and registered as a charity and was launched on 2nd July 2012 taking over responsibilities from British Waterways and the Waterways Trust in England and Wales. The creation of the Trust is the largest conversion of a public corporation into a registered charity as part of the Government's Big Society and localism agenda. Under the transfer of functions:

- (1) local planning authorities and Planning Inspectorate are now required to consult the Canal & River Trust on applications for planning permission in the same way as British Waterways were previously consulted;
- (2) all the operational and investment property of British Waterways in England and Wales has now vested in the Trust; and
- (3) all the statutory duties of British Waterways in England and Wales have been transferred to the Trust - to maintain the safety and structural integrity of waterway infrastructure, water supply, discharges and drainage, waterway management and maintenance operations, including maintaining water levels for navigation purposes; to protect and safeguard the natural environment, landscape character and built heritage of waterways; as well as to encourage public access to and recreation use of the inland waterways.

The Trust is responsible for holding and managing approximately 2000 miles of canals, rivers and linked docks, and reservoirs, along with historic buildings, archives and three waterway museums, (including the National Waterways Museum), on behalf of the nation. These national assets held by the Trust embrace an extraordinary variety of interests, activities and communities including: The UK's third largest collection of listed buildings and structures; 65 Sites of Scientific Interest;

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Patron: H.R.H. The Prince of Wales. Canal & River Trust is a company limited by guarantee registered in England & Wales under number 7807276; and a charity registered with the Charity Commission under number 1146792.

1000 wildlife conservation sites; and a floating community of around 35,000 boats. The Trust therefore has responsibility for a unique form of physical and community infrastructure (canals, rivers and non-operational docks).

The Trust is proactive in utilising its property assets and joint venture vehicles to bring forward land to deliver regeneration, wider benefits to the community and to attract private sector investment. As a charitable body, all the net rental income and capital receipts generated from our property estate and other commercial activities are used to maintain the waterways.

We work extensively with private, public and voluntary partners to conserve, enhance and improve our waterways within the Borough and nationally. We believe that our expertise and responsibility for waterspace, combined with the ownership of docks, canals and waterside properties, puts us in a unique position to facilitate redevelopment for economic, social and environmental gain. The canals in particular have historically experienced a prolonged period of decline. However, in recent years, the canals and navigable rivers have experienced significant development pressures from mixed use, commercial, residential, tourism/recreation and other developments. Attractive waterside environments have stimulated this interest and been at the heart of some of the most significant regeneration schemes in London, including the Queen Elizabeth Olympic Park.

Our waterways are helping to stimulate regional, sub-regional and local economies and are being used successfully as tools in improving community well-being, urban and housing offers; attracting and generating investment; place making and shaping; as well as in delivering wider public benefit. They are also making an increasingly important contribution to the visitor economy and there is a growing national awareness of the added value and commercial betterment deriving from the presence of waterways in developments.

The health and performance of the inland waterway network is directly linked to the quality of the neighbourhood and environment through which waterways passes. The public benefit delivered by the inland waterway network in turn is substantially dependent upon its health and performance. The Town and Country Planning Association's Policy Advice Note: Inland Waterways (2009) outlines the value of the waterways to local economies and health and well-being aims, providing a comprehensive framework for assisting in the delivery of high quality public waterspaces and waterside developments, and should be referenced within this document: <http://www.tcpa.org.uk/pages/inland-waterways.html>

We passionately believe that our London network of multi-functional canals, navigable rivers and docks have significant untapped potential to deliver leisure, recreation, tourism, culture, heritage, biodiversity, education, sustainability and regeneration opportunities. Our waterways can help to deliver the LDF's objectives in the following ways:

1. Encouraging high quality, mixed use, waterside regeneration schemes with an appropriate mix of moorings, which can help to transform London's inclusive canals and navigable rivers, and improve access to the towpath and the water for active use as open-air gyms or as quiet places to address inequalities in physical and mental health;
2. Promoting the waterways as 200-year old 'working heritage' which are part of the third largest heritage estate in England and attract innovative and entrepreneurial businesses on and by the water;

3. Place-making with the waterways integrated at the heart of new and existing communities contributing towards high quality environments;
4. Transforming London with well maintained and managed waterways in iconic locations with high quality modern architecture, complementing 200-year old working heritage that can help to improve Londoner's health (open air gyms), welfare (strong focus for communities) and development (opportunities for volunteering, education, etc);
5. Helping London to mitigate and adapt to climate change; and
6. Providing a truly sustainable 100-mile long, transport network right across London for walking, jogging, cycling, waterborne passengers and freight.

We have specific comments to make on the following policy within the document:

Section 2: Housing

The Canal & River Trust wishes to object to this section of the Local Plan insofar that it does not address the significant demand for residential moorings within London. Given the demand for residential moorings in London we would have expected to see a policy promoting these on the River Lee Navigation.

Moorings add animation and activity to the waterways as well as providing passive surveillance of the waterways and towpath for all users. In the case of residential moorings, these can provide 24 hour surveillance.

The provision of moorings is recognised within the London Plan as part of the Blue Ribbon Network policies. Paragraph 7.84 of the London Plan states:

The range of permanently moored vessels, for example residential barges, restaurants, bars and offices can add to the vibrancy of waterways and London in general. However, their siting needs careful consideration so that the navigation, hydrology and biodiversity of the waterways are not compromise. Consents for new moorings should be managed in a way that respects the character of the waterways and the needs of its users. The BRN should not be used as an extension of the developable land in London nor should parts be a continuous line of moored craft.

Although the term Blue Ribbon Network is included within the glossary of the Local Plan we note that there is no other mention of the Blue Ribbon Network within the remainder of the Development Management Policies.

We note that the London Borough of Enfield, which adjoins Haringey to the north, has included a moorings policy with their Development Management Policies, which were adopted in November 2014. Enfield's policy DMD 75 is included as Appendix 1.

To make the plan sound in this respect the Trust would like to see:

1. Further recognition of the Blue Ribbon Network, including cross references to the London Plan's BRN policies.

2. Recognition that there may be appropriate locations along the River Lee Navigation that would be suitable for permanent moorings, subject to a full assessment.
3. A policy addressing the issues of moorings along the River Lee Navigation.

The Trust also wishes to submit a copy of the London Assembly's November 2013 report *Moor or less: Moorings on London's waterways* as further evidence for the need for moorings to be addressed within the Local Plan.

Section 4: Environmental Sustainability

The Canal & River Trust objects to policy DM26 – Open Space.

The Trust considers policy DM26 part C to be unsound as it would preclude the installation of small serviced mooring bollards/posts along the River Lee Navigation. Serviced mooring posts allow a boat to connect to services such as water and electricity. These posts are typically less than a metre in height with a width and depth of 20cm and thus have a negligible impact in terms of the open character of the waterway. The Trust is concerned that the strictness of this policy would preclude the installation of these service posts in conjunction with an approved residential mooring scheme.

The Trust considers that the policy could be made sound by indicating that small structures associated with the provision of moorings along the River Lee Navigation will be considered acceptable provided that they do not harm the open character of the waterway.

Conclusion:

The Canal & River Trust considers that the local plan has not given sufficient consideration to the River Lee Navigation and this is highlighted by the fact the Blue Ribbon Network has not been referenced within the document other than within the glossary.

Although much of the River Lee Navigation within the Haringey falls within the Metropolitan Green Belt, the Trust considers that lack of waterway or mooring related context to be concerning. The Canal & River Trust would like to see the Local Plan include a policy similar to Enfield's policy DM 75, which we consider appropriately addresses the waterside context of that borough.

Should you have any queries on my comments, please feel free to contact me.

Yours sincerely,

Russell Butchers
Area Planner - London

Appendix 1: Enfield's Development Management Policy *DM75 – Waterways*

DMD 75

Waterways

Waterfront Character and Access to Waterways

All development proposed on or close to the riverside must protect and enhance the waterfront character. Developments should maximise opportunities to provide publicly accessible riverside greenways or shared routes.

Industrial/ commercial development which is exposed to a waterway should address the waterway and create pleasant and interesting views from that waterway. The buildings should take architectural cues from existing heritage features and should provide an attractive, and where possible, active façade to encourage passive surveillance. Public access to the waterfront should be retained or introduced. Access for staff must be maintained as a minimum.

Moorings

Permanent residential or commercial moorings on the River Lee Navigation will be supported provided they meet all of the following criteria:

- a. There is no harm to the intrinsic character of the river;
- b. There is no detrimental impact on amenity arising from traffic generation or servicing needs;
- c. There is no adverse impact on water-borne freight or leisure uses;
- d. There is no adverse ecological impact;
- e. There is no increase in flood risk; and
- f. There is no adverse impact on existing or planned water based leisure and recreation uses.

Freight

Development which maximises transportation of freight by water will be supported.

This policy should be read in conjunction with Core Strategy policies 34 and 35.