

Stephen Kelly
Assistant Director Planning
Haringey Council
Place and Sustainability Directorate
Planning Policy Team
6th Floor, River Park House
225 High Road,
N22 8HQ

19th March 2015

Dear Mr Kelly

RE: Consultation on the London Borough of Haringey's Local Plan; Alterations to Strategic Policies DPD, Site Allocations DPD Preferred Options, Development Management Policies DPD Preferred Options and Tottenham Area Action Plan Preferred Options document: Response from Lee Valley Regional Park Authority

Thank you for consulting the Regional Park Authority on the Local Plan consultations.

The Alterations to Strategic Policies DPD, Site Allocations DPD Preferred Options, Development Management Policies DPD Preferred Options and Tottenham Area Action Plan Preferred Options document were considered by the Authority's Lower Lee Valley Regeneration and Planning Committee on the 19th March 2015 at which Members approved the following comments as the Authority's formal response to the London Borough of Haringey.

Statutory requirements of Lee Valley Regional Park Act in relation to Local Plan documents – Development Management Policies document and Tottenham Area Action Plan.

It is of concern that following the Authority's previous comments on the Local Plan and meetings between officers from our respective organisations, there is still no policy reference to the adopted PDF Area 3 Proposals in either the Development Management Policies document or the Tottenham AAP. Both these Local Plan documents, once adopted will have a major influence on decisions affecting the future of the Regional Park.

As you are aware although the Authority is not a planning authority it has a range of powers which relate to the statutory planning process. Section 14 of

the Park Act enables the Authority to prepare proposals for the future management and development of the Regional Park. Riparian planning authorities **are required** to include these into their relevant planning strategies and policies although inclusion does not infer that the planning authority accepts these. For the purposes of the Park Act the London Borough of Haringey is a riparian Authority.

The Authority's Proposals for **Area 3 'Walthamstow Wetlands to Tottenham Marshes'** (adopted in 2013) cover the Park within Haringey and are relevant to the Local Plan consultation documents. By virtue of Sn 14 of the Park Act they should form part of the Development Management Policies Document, with additional references included in the Tottenham Area Action Plan.

These Area 3 proposals form part of a suite of documents, the Park Development Framework (PDF), which will in due course amend either in part or in its entirety the Park Plan 2000 for the purposes of s.14. Detailed Area proposals have been adopted for Areas 2, 3, 4 and 5 which represents the area of the Park from Hackney Marsh north to Rammey Marsh adjacent to the M25, covering the Park within the London Boroughs of Hackney, Waltham Forest, Enfield and Haringey and part of Epping Forest District.

Development Management Policies document

The following should be inserted into Chapter 4 'Environmental Sustainability' of the Development Management Policies document after policy DM26 Open Space. As previously stated it would build upon the Local Plan Strategic Policies document which makes only a minor reference to the Regional Park under Policy SP13 Open Space and Biodiversity.

Lee Valley Regional Park

The Council supports the Lee Valley Park Authority's (LVRPA) Park Development Framework (PDF) adopted Area Proposals schedule for the area of the Park within Haringey. These will be treated as a material consideration in the determining of planning applications in this area. In summary the current proposals address:

- a) **Creation of an enhanced visitor hub at Stonebridge Lock based around the existing Waterside Centre, to include café facilities, cycle hire and improved public realm**
- b) **Identifying options for development on Hale Wharf that will bring this site into a Park compatible leisure use whilst also meeting its designation as a Regeneration Area within the London Borough of Haringey's Core Strategy. For example:**
 - **new recreational or sporting facilities, based on the sites waterside location**
 - **accommodation serving visitors to the Park**
 - **waterside visitor facilities incorporating leisure uses for example café, cycle and canoe hire/club facilities**
- c) **active recreational use of the open spaces on Tottenham Marshes,**

- d) Working with stakeholders to increase recreational use of the waterways and a rationalisation of existing moorings along the Lee Navigation, especially between Stonebridge Lock and Ferry Lane
- e) Protection of Tottenham Marshes as an important urban wildlife habitat and nature reserve with further work undertaken to improve biodiversity and enrich the wildlife value.
- f) The Paddock Community Nature Park to be safeguarded as a local access to nature site. Existing habitats to be protected and enhanced to complement the adjoining Walthamstow Reservoirs.
- g) Support for the ongoing enhancement of visitor facilities at Markfield Park and the Markfield Beam Engine and Museum and improvements to pedestrian and cycle links between the site and adjoining areas of the Regional Park.
- h) Work with stakeholders to significantly improve the quality of Ferry Lane and Forest Road as a focus for entry to the Park

Justification text

Lee Valley Regional Park Authority

The Lee Valley Regional Park is an important component of the Borough's Green Infrastructure defined by its openness, heritage rich and biodiverse landscapes. The Regional Park is statutorily designated for leisure, recreation, sport and nature conservation. It covers an area of 10,000 acres (4,000 hectares) and extends for 26 miles following the River Lea from Ware in Hertfordshire south through Essex and North London to the River Thames. As development comes forward within the Borough there will be opportunities to open up new areas of the Park for public recreational use, improve access into the Park from adjacent communities and strengthen existing ecological sites.

The Council will support and work with the Regional Park Authority and other stakeholders to deliver the Park Plan 2000 and the Park Development Framework Area Proposals where these improve leisure and sporting opportunities for local communities, enhance access to open space and nature and help expand educational, volunteering and health related activities.

The Lee Valley Regional Park Authority is a statutory authority created by the Lee Valley Regional Park Act 1966 (the Park Act). It has a statutory responsibility to either provide directly or work with partners to provide facilities for sport, recreation, leisure, entertainment and nature conservation throughout the Park. Section 14 (1) of the Park Act requires the Authority to prepare a plan setting out proposals for the future management and development of the

Regional Park and riparian planning authorities such as Haringey Council are required to include those parts of the plan affecting their area within their own relevant planning strategies and policies (Section 14(2) (a)) although inclusion does not infer that the planning authority necessarily agrees with them (Section 14 (2) (b)). Both the Park Plan 2000 and the Park Development Framework are relevant in terms of Section 14 (2) of the Park Act and are formal statements of the Authority's position in respect of development within the Regional Park.

Further, sections 14 (subsections 4-7) of the Park Act requires local planning authorities to consult with the Authority on applications for planning permission which they consider could affect the Park. Section 14 (subsections 8-9) allows the Authority to refer the decisions of the riparian authorities to the Secretary of State if it is considered by the Authority that the decision taken materially conflicts with the proposals of the Authority for the development of the Park.

Those Area Proposals relevant to Haringey are included as the Appendix 'Lee Valley Regional Park Area Proposals'.

Inclusion of the Authority's adopted policies in Development Management documents was agreed by the LB Waltham Forest.

Tottenham Area Action Plan

The following additions should then be included within the Tottenham Area Action Plan document under the section entitled 'Tottenham Hale Neighbourhood Area'.

A reference to the PDF Area 3 Proposals should be included under the introduction section, paragraph 5.33 to establish the status of the PDF Area 3 Proposals, that they are relevant to the future of Tottenham Hale and also that they are largely supportive of the Council's own objectives for access improvements to the Lee Valley Park, 'Key Neighbourhood Area Objectives' para 5.36 and urban realm improvements para 5.3.

The Proposed Site Allocation for Hale Wharf TH7 needs to include a statement explaining that this site lies within the Regional Park and that the PDF Area 3 Proposals therefore apply. This could be accommodated within the existing 'Development Guidelines' section which currently mention "***The Lee Valley Park Plan***" in relation to "***improvement of the paddocks area***" It would be helpful to include the full Proposals text in relation to Hale Wharf as follows:

3.A.4 2) Hale Wharf

Work with the London Borough of Haringey, the Canal and River Trust and other stakeholders to identify options for development on Hale Wharf that will bring this site into a Park

compatible leisure use whilst also meeting its designation as a Regeneration Area within the London Borough of Haringey's Core Strategy. Appropriate uses would include (but are not restricted to) one or more of the following:

- New recreational or sporting facilities, based on the sites waterside location
- Accommodation serving visitors to the Park
- Waterside visitor facilities and facilities for clubs with a community emphasis, incorporating leisure uses for example café, cycle and canoe hire/club facilities.

The type, scale and design of development would need to be appropriate in terms of the sites location within the heart of the Park adjacent to internationally and nationally important biodiversity sites and its waterside environment.

Any development of the site would be expected to support and complement existing leisure and nature conservation activity and facilities in the area in particular the Walthamstow Wetlands project. It should also enhance landscape quality and visual permeability, the ecological values of the environment and adjoining waterways and support waterside habitat creation. Design should allow views through the site from the towpath to the reservoirs and wider Park.

Development on the site should encourage sustainable modes of transport, making full use of the Tottenham Hale Station and bus interchange, with improved pedestrian and cycle links between this hub, Blackhorse Road station to the east and strategic pedestrian and cycle links within the valley.

A new southern gateway into the Regional Park and Tottenham Marshes from Ferry Lane via Hale Wharf and a new pedestrian link across the waterways should form part of the regeneration of Hale Wharf.

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.

The Authority's Proposals for the Paddock should also be expanded to ensure they are properly represented. The Proposals under 3.A.4 Biodiversity state: **"The Paddock Community Nature Park to be safeguarded as a local access to nature site. Existing habitats to be protected and enhanced to complement the adjoining Walthamstow Reservoirs. Improvements to the entrance off Ferry Lane to be supported. Opportunities to create a new controlled pedestrian bridge link as part of a nature trail, between The Paddock and Walthamstow Wetlands to be explored."**

Officers from the Authority are willing to discuss further how the PDF Area 3 Proposals are incorporated within Haringey's Local Plan documents in order to ensure the most appropriate 'fit' with the Council's current documents and provide support for the Regional Park and its proposals.

Green Link

The Authority supports the Green Link concept which seeks a new east-west landscaped pedestrian and cycle route between Tottenham High Road and the Regional Park through the Tottenham Hale area. Officers from the Authority are currently involved in a working party to deliver this. Policy AAP4 'Green Link' (page 37) and the outline provision as part of the site requirements included within the Allocated Sites to safeguard the route are supported. The Authority would expect the Green Link to form part of the Infrastructure Delivery Plan (Chapter 6 para 6.11).

Strategic Policies and Site Allocations documents

The Authority does not wish to make comments on the Alterations to the Strategic Policies document as the amendments proposed do not impact on the Park. Likewise, at this stage, the Authority does not have comments on the Site Allocations DPD.

However the Authority will be interested to review the site requirements for key pieces of infrastructure coming forward following the review of the Council's Infrastructure Delivery Plan. It is understood these will be included in the Submission version of the Site Allocations document. In particular the Authority would welcome an early view of any detail relating to;

- three tracking of the West Anglia line,
- enhanced stations to serve Crossrail 2,
- TfL investment in the proposed cycle superhighway through Tottenham and Quietways cycle routes,
- a Green Gird approach to open space access providing a strategic interlinked network of high quality green infrastructure and open spaces and in the east opening up access to the Lee Valley Regional Park.

The Authority wishes to be kept informed of the outcome of this consultation in relation to all four documents and welcomes the opportunity to discuss the comments made above in further detail.

Yours sincerely

Stephen Wilkinson
Head of Planning and Strategic Partnerships

Park Development Framework Area 3 Proposals – Walthamstow Wetlands and Tottenham Marshes Adopted April 2013

Area 3 Proposals relevant to land within the London Borough of Haringey for inclusion in the Tottenham Area Action Plans in accordance with the Lee Valley Regional Park Act 1966.

Visitors	Sport & Recreation	Biodiversity	Community	Landscape & Heritage	Environment
----------	--------------------	--------------	-----------	----------------------	-------------

3.A.2	Markfield	<p>Support the ongoing enhancement of visitor facilities at Markfield Park and the Markfield Beam Engine and Museum.</p> <p>Improve pedestrian and cycle links between the site and adjoining areas of the Regional Park. In particular explore options with the Walthamstow Wetlands Partnership and other stakeholders for a pedestrian crossing of the River Lee Navigation to create a link into the Walthamstow Wetlands area that also connects through to Walthamstow Marshes in the south.</p> <p>Opportunities for heritage trails linked to other heritage interests within and outside the Regional Park to be explored</p>	<p>Support existing sport and recreational use and enhancement of the open spaces at Markfield Park.</p>	<p>The ecological value of Markfield Park and its role as a green wildlife corridor linking into the wider Regional Park to be protected. Opportunities to improve access to nature in accordance with the site management plan are supported.</p>	<p>Community based recreational, sporting, play and educational facilities and activities to be promoted and community facilities maintained as required by the site Management Plan.</p>	<p>Site management and improvement works to protect and enhance existing strong landscape character and identity. Support the ongoing protection, refurbishment and interpretation of existing buildings and features of heritage interest.</p>	
--------------	------------------	--	--	--	---	---	--

3.A.4	Tottenham Marshes, Hale Wharf & the Paddock	<p>Enhanced visitor hubs to be established at two locations:</p> <p>1) <u>Stonebridge Lock</u></p> <p>Stonebridge Lock to be developed as a visitor node based around the existing Waterside Centre. The Authority intends to work with the Canal and River Trust and other stakeholders to establish a café within the Waterside Centre with outdoor seating and improved public realm. Cycle hire facilities for Park visitors to be provided at the Waterside Centre potentially linked to other cycle hubs elsewhere within the Park including where feasible the London hire schemes operated by Transport for London.</p> <p>Enhance pedestrian and cycle routes and the associated environment into Tottenham Marshes from the adjoining communities to the west, building on existing improvements on Watermead Way and at the entrance to Stonebridge Lock. Enhance and promote the southern access into the Marshes from Ferry Lane and along the towpath south of Ferry Lane.</p> <p>Work with TfL and other partners to improve access from Tottenham Hale Station and bus interchange and Hale Village into the Park via an attractive, safe and well signed route.</p> <p>2) <u>Hale Wharf</u></p> <p>Work with the London Borough of Haringey, the Canal and River Trust and other stakeholders to identify options for development on Hale Wharf that will bring this site into a Park compatible leisure use whilst also meeting its designation as a Regeneration Area within the London Borough of Haringey's Core Strategy. Appropriate uses would include (but are not restricted to) one or more of the following:</p> <ul style="list-style-type: none"> • New recreational or sporting facilities, based on the sites waterside location • Accommodation serving visitors to the Park • Waterside visitor facilities and facilities for clubs with a community emphasis, incorporating leisure uses for example café, cycle and canoe hire/club facilities.
-------	---	--

		<p>The type, scale and design of development would need to be appropriate in terms of the sites location within the heart of the Park adjacent to internationally and nationally important biodiversity sites and its waterside environment. Any development of the site would be expected to support and complement existing leisure and nature conservation activity and facilities in the area in particular the Walthamstow Wetlands project. It should also enhance landscape quality and visual permeability, the ecological values of the environment and adjoining waterways and support waterside habitat creation. Design should allow views through the site from the towpath to the reservoirs and wider Park.</p> <p>Development on the site should encourage sustainable modes of transport, making full use of the Tottenham Hale Station and bus interchange, with improved pedestrian and cycle links between this hub, Blackhorse Road station to the east and strategic pedestrian and cycle links within the valley.</p> <p>A new southern gateway into the Regional Park and Tottenham Marshes from Ferry Lane via Hale Wharf and a new pedestrian link across the waterways should form part of the regeneration of Hale Wharf.</p> <p>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.</p> <p>Work with the Canal and River Trust to ensure existing moorings along the Lee Navigation, especially between Stonebridge Lock and Ferry Lane are rationalized and associated structures removed. Provide practical support where feasible to the Canal and River Trust in their remit to enforce against unauthorized moorings and manage mooring compounds effectively so that they do not detract from the amenity of the Park.</p> <p>Opportunities for a visitor water taxi service to be explored with the Canal and River Trust and other stakeholders.</p>
		<p>Support increased recreational use of the waterways. Work with stakeholders to reinstate canoe/kayak hire facilities at Stonebridge Lock and develop a flat water canoe trail as part of the route between the White Water Centre in Broxbourne and Old Ford in Tower Hamlets.</p> <p>Cycle hire facilities to be developed including facilities for the Lee Valley Cycle Ability Club with adapted bikes available for hire.</p>

		Promote active recreational use of the open spaces, including orienteering, through improved signage and site management. Options to further enhance these spaces for informal recreation and create a high quality waterside park to be explored with stakeholders.
		<p>Tottenham Marshes to be protected as an important urban wildlife habitat and nature reserve with further work undertaken to improve biodiversity and enrich the wildlife value. Watercourses that pass through the area and south of Ferry Lane to be safeguarded and enhanced as part of the ecological landscape and to improve wetland connectivity.</p> <p>The potential to redevelop part of Wild Marsh West to provide for flood alleviation whilst enhancing and promoting biodiversity and community access to nature will be explored with the London Boroughs of Enfield and Haringey and local user groups as part of the Meridian Water development</p> <p>The Paddock Community Nature Park to be safeguarded as a local access to nature site. Existing habitats to be protected and enhanced to complement the adjoining Walthamstow Reservoirs. Improvements to the entrance off Ferry Lane to be supported. Opportunities to create a new controlled pedestrian bridge link as part of a nature trail, between The Paddock and Walthamstow Wetlands to be explored.</p>
		<p>Clendish Marsh to be managed for events and local festivals with key stakeholders. Continue to explore and develop volunteer opportunities.</p> <p>Enhanced management of the East Hale Community Allotments to continue.</p>
		<p>The good quality of the landscape to be protected and enhanced and improvements undertaken in the southern part of Tottenham Marshes, adjacent to major roads and around allotment boundaries. Views out across the Regional Park to be safeguarded.</p> <p>New planting to be located to reduce the visual impact of neighbouring land uses, to provide structure within the area and to enhance the overall environmental quality.</p>
		Management of sustainable food growing at East Hale community allotments to continue. There should be a focus at this site and the Marsh Lane allotments, on initiatives for community led food production where these deliver social and biodiversity benefits, for example Living Under One Sun Community Allotment.

		<p>Work with the Environment Agency and other stakeholders and user groups to improve the biodiversity value of Pymmes Brook through the design and development of naturalised channels. Support work to substantially improve and maintain water quality in accordance with targets set under the Water Framework Directive.</p> <p>Work with Canals and River Trust and other stakeholders on options for securing the Lee Navigation as a route for waterborne transport.</p>
--	--	--

<p>3.R.1</p>	<p>Ferry Lane & Forest Road</p>	<p>Work with stakeholders to significantly improve the quality of Ferry Lane and Forest Road as a focus for entry to the Park by:</p> <ul style="list-style-type: none"> • Reducing the impact of the road on the openness of the Park by <ul style="list-style-type: none"> - improving its public realm, - partially removing the wall on the southern side to open up views and - strengthening landscape belts • Creation of a new pedestrian crossing to provide safe access into the main entrance for the Walthamstow Wetlands • Enhancing existing pedestrian and cycle routes adjacent to the road to include pedestrian reserves to facilitate safe access across the road and onto strategic off road routes such as the Lee Valley Pathway • Improving bus services and provision including new bus stops/shelters close to Park entrances • Ensuring access from Blackhorse Road Station into the Park via Forest Road is clearly signed and promoted • Implementing a co-ordinated signage strategy for the road frontage including directional and entrance signage that reflects the range of facilities available.
---------------------	--	---



