



Canal &
River Trust

Keeping people, nature & history connected

7th March 2014

Haringey Borough Council
Planning & Environmental Control Service
639 High Road
Tottenham
London
N17 8BD

Dear LDF Team,

Re: Public Consultations for LB Haringey Site Allocations Development Plan Document and Tottenham Area Action Plans

Thank you for consulting the Canal & River Trust on these recent documents.

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; 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).

Canal & River Trust Toll House Delamere Terrace Little Venice London W2 6ND
T 0303 040 4040 E customer.services@canalrivertrust.org.uk www.canalrivertrust.org.uk

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.

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.

This response is provided both by The Canal and River Trust and our joint venture partner ISIS Waterside Regeneration who are taking the site at Hale Wharf forward for development.

Site Allocations DPD

Page 11 Sites in Tottenham Hale

TH7: Hale Wharf proposes “a new residential quarter with shopfront type mixed use workspace, potential for cafes and restaurants on the waterfront.” We absolutely support a proposed new residential quarter here, but not with other mixed uses. This site needs to provide support to the area’s existing commercial uses. There are more workspace units to be planned around Tottenham Green, and this probably needs to be the focus for this activity. We would probably support some leisure use around the lock, and fronting Ferry Lane, and of course activities on the actual water for example the Business Barges that are already in place.

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“New residential-led riverside development providing new homes and a completion of the sustainable linkage between Tottenham Hale and the Lee Valley Regional Park. A café should be provided to complement the riverside location, providing for local residents as well as recreational visitors.”

The Lock Keeper’s cottages site, the Wharf and Garage site should all consider how linkages and connections could be improved through to Tottenham Hale and beyond. A potential leisure use would probably be better at the Lock Keeper’s cottages at the actual entrance to the park, or on the front by the locks.

Storey heights

We support the proposal for 5 storeys at the reservoir end of the site, but instead stepping up to 10-12 storeys on Ferry Lane. This is responding to the increase in heights now on Hale Village and the new proposed 28 storey tower. LB of Haringey have commissioned a Development Brief to ensure a comprehensive scheme is delivered across the Wharf, the Garage and Lock Keepers Cottages, something both we and ISIS support.

Bridge over River Lea

We would support the requirement for improving connections around the site and linkages to the wider area. The Green Route is vital to this.

Page 30 - Employment Land in Tottenham Hale

We acknowledge that an Employment Land Update is being carried out. The Wharf and Garage site should be removed from the designation of Employment Land.

Tottenham AAPs

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With regard to the reference to severance from the railway, and the loss of contact with the Lee Valley – this is supported by our objection to the lack of DDA access for the proposed footbridge as part of the Tottenham Hale Station works.

Page 9 South Tottenham

The River Lee Navigation should be referred to as another asset to this area.

4. South Tottenham Map

We support the description of Tottenham Hale as "...gateway to the wider Haringey area and Tottenham Hale as a place that supports new mixed use housing.new movement projects such as bridges and permeable routes to the Walthamstow Wetlands".

With regard to the questionnaire for the South Tottenham area, we have answered the questions, below:

Q15 To what extent do you agree with our description of South Tottenham presented in the AAP?

We agree, but we consider there is a balanced housing need, bearing in mind the quantum of student accommodation and affordable housing already delivered on Hale Village.

Q17 In order to make South Tottenham a more successful place what transport issues or opportunities do you think need to be addressed?

The redeveloped Tottenham Hale Station should be fully accessible. This would also be supported by a redeveloped Bus Station, and welcoming Bus Depot.

Legible London signage has been introduced in the Lower Lee Valley around the Queen Elizabeth Olympic Park, and is being rolled out elsewhere across the Canal & River Trust's London network – we would therefore also support this in Tottenham Hale.

Q18 In order to create successful places in South Tottenham what housing issues or opportunities do you think should be addressed?

The provision of a balanced housing provision.

Q19 What would make town centres in South Tottenham more successful?

A balanced housing provision that potentially introduce more local spending power.

Q20 How do you think sports and leisure needs in South Tottenham could be best met?

Support for moorings and waterborne recreation, including boater facilities.

Q21 What design and heritage opportunities and challenges do you think there are in South Tottenham?

The River Lee Navigation is a significant heritage feature and focal point of the area, and new development must reflect and enhance the waterside character.

Q22 What would make movement within and around South Tottenham easier?

A DDA compliant access from Tottenham Hale Station, as referred to above.

Q23 What do you think could be done to increase job opportunities and the skills of local people in South Tottenham?

No comments.

Q24 In light of the regeneration agenda in Tottenham, do you think there is the opportunity to redesignate employment land for other uses in South Tottenham?

Yes – we consider that the Hale Wharf site and the adjacent garage site should be redeveloped as residential sites.

Q25 How could South Tottenham's open spaces and biodiversity be improved?

There are opportunities for improvements to accesses to the Lee Valley Regional Park and the Navigation and its towpath. The towpath was recently resurfaced, but as housing numbers increase and demand for walking and cycling grows, future resurfacing and works will be required.

There are also opportunities for biodiversity improvements, such as hedgerow planting and potentially some waterbased planting, subject to navigational requirements.

Q26 What environmental and sustainability Issues do you think need addressing in South Tottenham?

The water quality of the River Lee Navigation is fairly poor because of contamination that feeds in from tributaries, including Pymmes Brook, Salmons Brook and Turkey Brook. The Council could more actively support Thames Water in preventing and overcoming misconnections, and pollution that feeds into the Navigation. There may also be other opportunities for water quality improvements, that our environment team would be happy to advise on.

I hope that these comments are clear, and we would be happy to discuss them in further detail with the LPA if that would be helpful. Please feel free to contact me should you have any queries on these comments.

Yours sincerely,



Claire McLean
Area Planner - London

Telephone: 0203 204 4409 E-mail: claire.mclean@canalrivertrust.org.uk