



Email:  
Direct Dial:

Sule Nisancioglu  
Planning, Transport Policy & Environmental Resources Manager  
Place and Sustainability Directorate  
London Borough of Haringey  
Planning Policy Team  
6<sup>th</sup> Floor River Park House  
225 High Road,  
Wood Green  
N22 8HQ

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Dear Sule

**RE: Consultation on the London Borough of Haringey's Draft Development Management Policies document: Response from Lee Valley Regional Park Authority**

Thank you for consulting the Regional Park Authority on the Haringey Local Plan Draft Development Management Policies Document.

This matter was considered by the Authority's Lower Lee Valley Regeneration and Planning Committee on the 18<sup>th</sup> April 2013 at which Members approved the following comments as the Authority's formal response to the London Borough of Haringey.

**Statutory Requirements of Park Act in relation to the Draft Development Management Policies document**

As you are aware significant areas of recreational open space and important ecological resources of the Regional Park lie within Haringey. As such the Development Management policies, once adopted will be important in terms of the protection, enhancement, development and management of the Regional Park and the public enjoyment of its leisure, nature conservation, recreational and sporting resources. There are however statutory requirements under the terms of the Lee Valley Regional Park Act 1966 that the London Borough of Haringey need to address in the content of their Development Management Policies document.

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. The Park starts in east London extending northwards from the River Thames to Ware in Hertfordshire and comprises 4,000ha of which 1,600ha are owned and managed by the Authority. It has a political membership comprised of councillors drawn from across London, Hertfordshire and Essex from both Riparian and Non-riparian authorities although the majority of our Members are drawn from the riparian boroughs.

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. For the purposes of section 14 of the Lee Valley Regional Park Act 1966 the Park Plan (Parts 1&2) 2000 (Park Plan 2000), is still the adopted s.14 Plan of the Authority. However as you are aware the Authority is in the process of producing a 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.

The Authority has produced, consulted upon and is soon to adopt Area based Proposals for those sections of the Park that lie within Haringey – Area 3 'The Waterlands'. It is likely that these will be adopted by the end of April 2013. It should be noted that the PDF is consistent with the Park Plan 2000 and our remit. Accordingly both the Park Plan 2000 and the PDF 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.

From the above it is clear that in order to meet the statutory requirements of the Park Act the Development Management Policy document will need to include the PDF Proposals for the Park area within Haringey.

The DMD should therefore include a policy that supports appropriate development in the Park in accordance with the Park's remit and the Park Development Framework Area Proposals as they relate to Haringey. This could be placed within the section entitled 'Enhancing our borough's

infrastructure' under the policy category for Open Space DM21. 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.

There have been discussions with officers at Haringey regarding the content of the Area Proposals as they relate to the Park in Haringey. These Area Proposals were adopted by the Authority on 25 April 2013 and can therefore be included in the final draft stage of the DMD.

The following wording is suggested for a policy and for justification text:

### **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.*

*During 2012 the Lee Valley Regional Park Authority developed and consulted on detailed proposals for an area of the Park, a significant proportion of which lies within the London Borough of Haringey. The proposals were adopted in April 2013. Those Area Proposals relevant to Haringey are included as the Appendix 'Lee Valley Regional Park Area Proposals'.*

Please refer to Appendix A to this letter which sets out the relevant adopted Area Proposals for inclusion within the DMD.

**DMP18 Managing Provision of Community Infrastructure (including health, education, leisure & other community facilities)**

The Authority supports proposals under Policy DMP18 to enhance and fund strategic infrastructure through new development via CIL and section 106 agreements. The list included of physical, social and environmental infrastructure that can be progressed via CIL or s106 should take account of the Regional Park. The negotiation of planning permission for sites adjacent to the Regional Park could have adverse impact which may require planning obligations to ensure they are adequately mitigated.

The Authority wishes to be kept informed of the outcome of this consultation. Officers are happy to discuss the exact format and content of policy to be included in the draft Development Management Policies document to support the Regional Park and its proposals.

Yours sincerely

Stephen Wilkinson  
Head of Planning and Strategic Partnerships

**APPENDIX A ADOPTED AREA PROPOSALS FOR INCLUSION IN THE DEVELOPMENT MANAGEMENT POLICIES DOCUMENT**

**Park Development Framework Area 3 Proposals - Walthamstow Wetlands and Tottenham Marshes**

Visitors	Sport & Recreation	Biodiversity	Community	Landscape & Heritage	Environment
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3.A.2	<b>Markfield</b>	<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.</p> <p>Support the ongoing protection, refurbishment and interpretation of existing buildings and features of heritage interest.</p>			
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		Enhanced visitor hubs to be established at two locations:
<b>3.A.4</b>	<b>Tottenham Marshes, Hale Wharf &amp; the Paddock</b>	<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"> <li>• New recreational or sporting facilities, based on the sites waterside location</li> <li>• Accommodation serving visitors to the Park</li> <li>• Waterside visitor facilities and facilities for clubs with a community emphasis, incorporating leisure uses for example café, cycle and canoe hire/club facilities.</li> </ul>

	<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.</p> <p>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>

	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.
	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.
	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
	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.
	Clendish Marsh to be managed for events and local festivals with key stakeholders. Continue to explore and develop volunteer opportunities. Enhanced management of the East Hale Community Allotments to continue.
	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.
	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.
	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

		<p>and biodiversity benefits, for example Living Under One Sun Community Allotment.</p> <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>
3.R.1	Ferry Lane & Forest Road	<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"> <li>• Reducing the impact of the road on the openness of the Park by <ul style="list-style-type: none"> <li>- improving its public realm,</li> <li>- partially removing the wall on the southern side to open up views and</li> <li>- strengthening landscape belts</li> </ul> </li> <li>• Creation of a new pedestrian crossing to provide safe access into the main entrance for the Walthamstow Wetlands</li> <li>• 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</li> <li>• Improving bus services and provision including new bus stops/shelters close to Park entrances</li> <li>• Ensuring access from Blackhorse Road Station into the Park via Forest Road is clearly signed and promoted</li> <li>• Implementing a co-ordinated signage strategy for the road frontage including directional and entrance signage that reflects the range of facilities available.</li> </ul>



