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5th March 2014

Dear Mr Kelly

RE: Consultation on the London Borough of Haringey's Site Allocations Development Plan Document and Tottenham Area Action Plans document: Response from Lee Valley Regional Park Authority

Thank you for consulting the Regional Park Authority on the Site Allocations Development Plan Document and the Tottenham Area Action Plans document.

Site Allocations for the Tottenham Growth Area and the Tottenham Area Action Plans impact on important open space areas of the Regional Park and once adopted will be a major influence on them.

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 proposal 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.

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.

The Authority has been preparing 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. The Authority has adopted the Vision, Strategic Aims and Principles (July 2010) and a series of Thematic Proposals (in January 2011) which set out development and management proposals on a broad Park-wide thematic basis.

More recently the Authority has been translating the thematic proposals onto area based maps, in line with Section 14 of the Park Act to provide specific proposals covering the whole Park. This is a phased process with priority being given to areas where significant change within or adjacent to the Park is planned. The Authority has now adopted proposals 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. These new proposals replace sections 7, (part only) 6, 5 and 4 of Part Two of the Park Plan (2000) and are a formal statement of the Authority's position in respect of development within the Regional Park and can be found here <http://www.leevalleypark.org.uk/go/pdf/>

Proposals for Area 3 'Walthamstow Wetlands to Tottenham Marshes' are relevant to the consultation documents and by virtue of Sn 14 of the Park Act should form part of the Tottenham Area Action Plans for Northumberland Park and South Tottenham, part of Haringey's development plan.

The Site Allocations Development Plan Document and the Tottenham Area Action Plans document were considered by the Authority's Lower Lee Valley Regeneration and Planning Committee on the 13th February 2014 at which Members approved the following comments as the Authority's formal response to the London Borough of Haringey.

LVRPA Comments relating to the consultation documents

The Lee Valley Regional Park forms a significant part of the Borough's green infrastructure recognised as an important asset in Haringey's recently adopted

Local Plan: Strategic Policies. Local Plan policy SP13 'Open Space and Biodiversity' states that:

“The Council will enhance and improve the borough’s green infrastructure through:Working with the Lee Valley Regional Park Authority to protect and enhance access to the Park, its waterside open spaces and habitats, recreational and sporting facilities”.

Justification text for Policy SP13 offers support for the Authority and other partners in “efforts to increase the range and access to open space for both residents and visitors”.

Greater emphasis should be placed on the Regional Park and the adopted Area Proposals in the Site Allocations document under the site profile for Hale Wharf and in both proposed Area Action Plans. Substantial areas of Regional Park’s open space lie within the Tottenham Area and whilst there are some references to the Regional Park, which are welcomed, these need to be strengthened. Detailed comments follow below.

The Authority considers that both the Site Allocations document and the draft AAP require a clear reference to CIL funding (or where relevant section 106) to provide improvements to green infrastructure and in particular for access projects. These will help link the Park to areas of deprivation within Haringey and improve opportunities for leisure and access to nature. This point was raised by officers in June 2013 in response to the Council’s Preliminary Draft Charging Schedule Consultation. It remains pertinent where a balance is required between a growing population and improved permeability to the Regional Park which allows access to its complex variety of open spaces and venues.

Site Allocation DPD – Hale Wharf TH7 new residential-led riverside development

The Policy designations listed under the Hale Wharf site profile should make reference to the Local Plan Policy SP13 Open Space and Biodiversity, and the Park Development Framework. These references help to establish that Hale Wharf, despite its largely ‘developed’ state, does form part of the Regional Park and with its waterside location and proximity to Tottenham Marshes and the Walthamstow Reservoirs, has potential to be enhanced as part of the borough’s green infrastructure. Reference is also needed to its location adjacent to internationally and nationally important biodiversity sites – Walthamstow Reservoirs SSSI.

The Site Profile should reflect the requirements of the PDF Area Proposal 3.A.4 (2) as set out below. This recognises that Hale Wharf forms part of a Regeneration Area within Haringey and has value for generating local employment. It seeks to achieve a balance between bringing the site into a use that accords with the Park’s remit and enhances the waterside

environment whilst contributing to the wider regeneration of the Tottenham area and meeting the Council's need to maintain an employment generating use. Proposal 3.A.4 states:

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.

It is proposed that the Council reconsider the site profile for Hale Wharf. A less intensive development compatible with the Park Act would achieve a wider spectrum of benefits and help reconnect this site into the wider green infrastructure network

The Authority is concerned that the Design Principles included in the site profile will result in a high intensity development that takes no account of the sites sensitive waterside surroundings, (building heights of 5 to 8 storeys are recommended, together with communal gardens close to the banks of the River Lee). The site profile includes a range of other desirable uses a number of which the Authority would consider essential, for example, protection of waterside wildlife corridors, pedestrian walkways that connect with routes through the Regional Park, and an east-west walking and cycling route linking Tottenham High Road and the Regional Park. It is not clear however as to whether all these elements could be accommodated on the same site especially as it is in an area of high flood risk and potentially contains contaminated land.

The Authority is concerned that the recommended building height is set at 5 to 8 storeys particularly given that Hale Wharf is a narrow site located within the centre of the Park. Given the Park consists predominantly of extensive sections of relatively flat river valley floor tall buildings would erode the openness of the Park landscape and the connectivity and sense of place created by long views through the landscape and along waterway corridors.

Controls over storey height included in the adopted masterplan indicate heights stepping away from the Regional Park rising to 20 plus in the south west corner of Hale Village (furthest from the Park). The relationship to the Park is critical in that its permeability should be protected by both providing routes and views through adjacent development. The inclusion of heights up to 8 storeys on Hale Wharf doesn't respect its parkland setting. Storey heights should not exceed 5 storeys.

Site TH2 Tottenham Hale Station Interchange

The Authority welcomes the inclusion of the Site Allocation to redevelop Tottenham Hale station as a gateway to Tottenham and the wider North London area. The Authority considers Tottenham Hale station, together with the bus station to be a major public transport node serving the Regional Park. This should be referenced under the Site Profile.

The Authority supports the reference in the design principles to 'a new pedestrian and cycle friendly east-west link' envisaged in the north of the site which will bridge the railway and align with the east-west link through to Hale Village and on through to the Regional Park. The Authority has also recently been consulted on a planning application for redevelopment of Tottenham Hale Station which includes a station link through to Hale Village. The Authority has requested the provision of signage directing visitors to both the

Lea Valley Walk and the Lee Valley Regional Park, via the new Hale Village Link in order to enhance access into the Park.

Tottenham Area Action Plans Consultation

The Authority welcomes an Area Action Plan approach to the Tottenham Area. It is unfortunate that the Park area is divided between the two Area Action Plans especially as the division appears to have occurred at Stonebridge Lock and thus separated the Waterside Centre and Lock, identified as an enhanced visitor hub in the PDF Area Proposals from the main entrance into the Marshes.

Tottenham Marshes and the associated waterway corridor are an important part of the borough's green infrastructure which already suffers a degree of disconnection from adjoining communities due to severance from railway lines and major roads. This is raised in the general discussion of issues for the Tottenham AAPs and will need to be addressed in some detail in both AAPs to ensure east west movement into and then within the Park as a whole, from residential and business communities west of the railway and Watermead Way is enhanced and promoted.

Both AAPs will need to include the PDF Area Proposals for Tottenham Marshes and the South Tottenham AAP will also need to include reference to Proposals for Hale Wharf (as discussed above), the Paddock and Markfield Park. Relevant sections of the PDF Area Proposals are included as Appendix A to this letter.

A summary of the key proposals that should be incorporated and supported by the AAPs are as follows, some will apply to both AAPs

- The need to enhance Stonebridge Lock as a key visitor hub, based around the Waterside Centre, with increased recreational use of the waterways and the reinstatement of canoe/kayak hire facilities at Stonebridge Lock
- Further enhancement of pedestrian and cycle routes and the associated environment into Tottenham Marshes from the adjoining communities to the west and from Ferry Lane
- Partnership working with TfL to improve access from Tottenham Hale Station and bus interchange and Hale Village into the Park via an attractive, safe and well signed route
- Partnership working 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.
- The promotion of active recreational use of the open spaces and events and local festival use of Clendish Marsh whilst also protecting the Marshes as an important urban wildlife habitat

- Safeguarding of the Paddock Community Nature Park as a local access to nature site; site management to complement the adjoining Walthamstow Reservoirs
- The protection of landscape quality and enhancement works undertaken in the southern part of the Marshes
- Improve pedestrian and cycle links between Markfield Park and adjoining areas of the Regional Park, explore opportunities for heritage trails linked to other heritage interests within and outside the Regional Park.

The Authority wishes to be kept informed of the outcome of this consultation. Officers would welcome the opportunity to discuss the inclusion of Area Proposals in the Area Action Plans as the Council proceeds to the next stage in the process.

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
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3.A.2	Markfield		Support the ongoing enhancement of visitor facilities at Markfield Park and the Markfield Beam Engine and Museum.
			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.
			Opportunities for heritage trails linked to other heritage interests within and outside the Regional Park to be explored
			Support existing sport and recreational use and enhancement of the open spaces at Markfield Park.
			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.
			Community based recreational, sporting, play and educational facilities and activities to be promoted and community facilities maintained as required by the site Management Plan.
			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.

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.
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		<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>
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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"> • 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.



