

**LONDON BOROUGH OF HARINGEY NEW LOCAL PLAN FIRST  
STEPS ENGAGEMENT CONSULTATION (REGULATION 18)**

Presented by the Head of Planning

**SUMMARY**

Haringey Council are consulting on their new Local Plan 'First Steps Engagement' Regulation 18 draft. This document sets out the key issues to be addressed by the New Local Plan, and asks a series of questions about the issues and challenges facing the future planning of the borough, seeking views on options to address them. The Council intend this document to start a conversation about the direction of New Local Plan and as such it does not contain draft policies.

Comments on the First Steps Engagement are set out in the letter attached as Appendix A to this report.

The Council has captured a number of the issues that are relevant to the Park in terms of the importance of design and the public realm and the challenges involved in optimising densities to meet housing need whilst also creating an attractive, accessible and inclusive borough where the multiple health and well-being benefits of natural assets are protected and improved and due recognition is given to their intrinsic environment and eco-systems benefits. This is important to the Authority because policy will need to recognise the existing and future contribution that the Park's open and waterside spaces, its visitor attractions and biodiversity can make in relation to the Lee Valley Opportunity Area and Tottenham Hale in particular. It will be important to ensure full reference is included to the Regional Park, its remit and the Park Development Framework (PDF) Proposals as they relate to Haringey.

**RECOMMENDATION**

Members Approve:                   (1)   the comments as set out in Appendix A to this report as the Authority's formal response to the consultation by the London Borough of Haringey on the First Steps Engagement New Local Plan November 2020.

**BACKGROUND**

1    Haringey Council is looking to develop a new Local Plan covering the period up

to 2037. This is required in order to help deliver the new Borough Plan adopted in 2019 which established a set of priorities based on four themes:

**Housing – a safe, stable affordable home for everyone, whatever their circumstances**

**People – strong families, strong networks and strong communities nurture all residents to live well and achieve their potential**

**Place – strong, resilient and connected communities where people can lead active and healthy lives in an environment that is safe, clean and green**

**Economy – a growing economy which provides opportunities for all our residents and supports our businesses to thrive.**

Policy topics to be considered for inclusion within the Local Plan are grouped under these priority themes.

- 2 The new Local Plan will reflect recent changes in national legislation, and the new London Plan (to be published shortly) together with the housing targets it sets for Haringey. It will be a key tool for the Council to use in tackling the climate emergency which was declared in March 2019. The Council also intend for the Local Plan to guide recovery and change in response to the Covid 19 pandemic.
- 3 This First Steps Engagement version of the Local Plan seeks public input from the outset as well as discussions with statutory partners via the more formal Duty to Cooperate processes. The Local Plan is accompanied by an Integrated Impact Assessment (IIA) which brings together three types of assessment; sustainability, an equalities impact and a Health Impact Assessment to ensure that the effects of its policies, the need for any mitigation and reasonable alternatives are all adequately considered. A Scoping Report for the IIA is being consulted on alongside the First Steps document. A Habitats Regulation Assessment will also be undertaken as a parallel process to the IIA. A wide range of other evidence base studies are also anticipated including an Infrastructure Delivery Plan and Funding Statement.
- 4 The Council are aiming to adopt the New Local Plan by end of 2022. It will then replace the 2017-2026 Local Plan which consists of four documents; the Strategic Policies Development Plan Document (DPD), the Development Management DPD, the Site Allocations DPD and the Tottenham Area Action Plan.
- 5 Approximately 77 hectares or 1.9% of the Regional Park lies within Haringey, located within the eastern section of the borough. It includes the large open recreational spaces of Tottenham Marshes, Hale Wharf, now the site of Hale Village, the waterways of the River Lee, the Navigation and Pymmes Brook Flood Relief Channel and the Waterside Centre at Stonebridge Lock, the Paddock Community Nature Reserve and Markfield Park. Please refer to the Plan at Appendix B to this report.
- 6 The Park area forms part of the Lee Valley Opportunity Area which, within Haringey, focuses around the North Tottenham and Tottenham Hale areas. As such significant change has taken place over recent years with major high rise residential development clustered around the mainline station at Tottenham Hale and further waterside sites now under construction at Hale Village. As part of these developments new pedestrian bridges and cycleways are being constructed which will link across the waterways providing new visitor routes

through the various sites and into the Park connecting into the station and other Park areas to the north and south.

- 7 **Park Development Framework Area 3 Proposals 'The Waterlands'** cover this part of the Park and were adopted in April 2013. Those that are relevant include the Visitor Proposals; these seek to establish an enhanced visitor hub at Stonebridge Lock and the existing Waterside Centre, with café facilities, cycle hire and improved public realm (3.A.4), and support the ongoing enhancement of visitor facilities at Markfield Park and the Markfield Beam Engine and Museum, including improvements to pedestrian and cycle links between the site and adjoining areas of the Regional Park (3.A.2). Proposals also aim to increase recreational use of the waterways and a rationalisation of existing moorings along the Lee Navigation. Sport & Recreation Proposals are focused on active recreational use of the open spaces on Tottenham Marshes and exploring options with stakeholders to create a high quality waterside park. Clendish Marsh is to be managed for events and local festivals with key stakeholders.
- 8 Biodiversity proposals seek to protect Tottenham Marshes as an important urban wildlife habitat and nature reserve with further work undertaken to improve biodiversity and enrich the wildlife value. At the Paddock Community Nature Reserve proposals identify the importance of protecting and enhancing habitats to complement the adjoining Walthamstow Reservoirs. The good quality of the landscape is to be protected and enhanced and improvements undertaken adjacent to major roads and around allotment boundaries. Proposals seek to safeguard views out across the Regional Park.
- 9 Comments received from this consultation will inform the next iteration, later in 2021 of the draft Local Plan, (a further Regulation 18 consultation) before the preparation and consultation on a Proposed Submission Local Plan (Regulation 19). This will then be submitted for examination by an Independent Planning Inspector before final adoption by the council.

#### **THE FIRST STEPS DRAFT LOCAL PLAN – KEY ISSUES**

- 10 The range of issues facing the new Local Plan are discussed in the IIA with the headlines presented in the First Steps document. These issues include the importance of addressing the needs of a growing and diverse population; both the borough's comparatively young population as well as a growing older population. 2018 figures estimate the boroughs population at almost 283,000 and the IIA projections show this increasing by 9% to 295,162 by 2037. There is an urgent need for housing of all types in the borough, particularly housing that is genuinely affordable to local residents. Since 2011 housing delivery has fallen short of targets and figures show that as of 2018 most residents live in a rented property. The Council now propose to plan for the ten-year minimum housing target to 2029 of 15,920 homes, which has been set by the London Plan.
- 11 In 2017 Haringey had 92,000 jobs which is below that of statistical neighbours and London averages. The industrial estates in the eastern part of the borough along the Lee Valley corridor are the most significant employment location in the borough although Haringey also has strong sectors in public services, retail, arts and entertainment, accommodation and food. Although three quarters of Haringey's working age population were economically active before Covid 19 the pandemic has badly impacted the local economy due to high numbers of

employees in sectors adversely affected by social distancing. The Local Plan will need to include policies that can secure sustainable economic growth and business development through increasing and diversifying employment opportunities, meeting the needs of different sectors of the economy and facilitating new land for business development.

- 12 The Council propose that the new Local Plan will support the “good growth” agenda set out in the London Plan where growth is “socially and economically sustainable and is focused on sustainable development”. For Haringey this will mean making the best use of land whilst having regard to the varied character of the borough, a local interpretation of high quality design, and a focus on reducing carbon emissions and mitigating climate change.
- 13 The IIA has also highlighted the need to deliver a network of high quality accessible open spaces across Haringey, especially in those areas deficient in access to open space. It also notes that whilst the borough has decent access to the wider natural environment this will need to be enhanced whilst securing the most open space viable from redevelopment plans, including pocket parks, civic spaces and play space.
- 14 The projected increases in population and housing will put considerable strain on transport and other infrastructure particularly in the growth areas of Tottenham and Wood Green. Local Plan policy will need to encourage a shift towards more sustainable modes of transport and further enhance the existing good provision of public transport links and capitalise on the recent investment in cycling infrastructure.

#### **COMMENTS ON FIRST STEPS DRAFT LOCAL PLAN**

- 15 **Area 2: Northumberland Park, Tottenham Hale and South Tottenham**  
The new Local Plan seeks to address the issues and challenges as well as the opportunities presented by the different areas within the Borough; 7 areas are identified and the Regional Park is located within Area 2: Northumberland Park, Tottenham Hale and South Tottenham. Area 2 includes the Tottenham Hale housing zone where the development of 5000 units is well advanced. The Council states it will offer further support in order to establish a mixed use District focused around the Tottenham Hale station. The ecologically significant spaces of the Regional Park are identified as part of Area 2.
- 16 The opportunities identified in the First Steps document for Area 2, in relation to ‘Place’ could bring benefits to the Regional Park. The Council has highlighted the need to improve the quality of the green spaces and enhance the biodiversity of the Park, to support the delivery of green links through to open space, to reconnect to the lost history of the area via heritage trails, signage and educational material, and ensure new development supports more walkable and cycle friendly layouts. These are all issues that the Authority has also previously highlighted when commenting on new development proposals within the Tottenham area, particularly in relation to the quantum and proximity of development taking place and the pressure this brings to bear on the Park. Policy in the new Local Plan will need to secure the delivery of these improvements.
- 17 A greater emphasis will also need to be placed on protecting, re-creating and enhancing the ecology of the area, for example the grassland or water based habitats. This will need to be addressed in policy, particularly given the

significant increased pressure all habitats and wildlife will be experiencing from higher numbers of people living and working in close proximity.

- 18 **Commentary under this section also refers to the requirement for a review of green belt boundaries; to assess whether they remain appropriate in line with national planning policy and the London Plan. Further explanation of this point will be sought.**

19 **Borough Priorities**

These are set out under the four headings of Housing, People, Place and Economy. The First Steps consultation asks a series of questions about what the Plan could do to address a range of issues and opportunities in relation to each topic. The Regional Park is part of Haringey's environment and as such is important in terms of its residents, businesses/employers and as a key attraction of the borough. The 'Place' theme and future policy formulated to address the issues and opportunities raised in this section is the most relevant to the Authority and the Regional Park.

20 **Design**

The Place theme highlights the importance of design and the challenge involved in achieving "design excellence in building architecture and the public realm" whilst also "optimising densities" and designing a "safe, accessible, healthy and inclusive borough". The First Steps document recognises the multiple health and well-being benefits of natural assets, as well as the intrinsic environment and eco-systems benefits. This is important to the Authority because of the existing and future contribution that the Park's open and waterside spaces can make in relation to the Lee Valley Opportunity Area and Tottenham Hale in particular.

- 21 **Policy and design strategies incorporated within the Local Plan will need to ensure the Regional Park is protected and enhanced and also buffered by the creation of new open and biodiverse space delivered as an integral part of development. This is critical given the Council's push to optimise density and deliver tall buildings in appropriate locations. The outcome of the higher density and tall buildings provided on Hale Wharf is as yet unknown in terms of its impact on the Park. The Authority has expressed concerns at each of the application stages on this matter, despite acknowledging the benefits achieved in terms of new bridge links and access improvements to the Park.**

22 **Heritage & Culture**

The Regional Park is a cultural asset with important industrial, built and landscape heritage. Within Haringey the changes to, and use of the open spaces and waterways have a history and meaning to past and current communities and sites such as Markfield Park and the Markfield Beam Engine and Museum are important heritage assets, one of a number that exist throughout the Park. A strategic approach with a clear vision for heritage and culture should underpin policy in the Local Plan and the Authority would support targeted heritage policies. The Authority's parklands also make an important contribution to cultural activity and the PDF Proposals envisaged further use of Clendish Marsh in this respect. Policy will however need to consider the balance to be struck between encouraging outdoor events and cultural gatherings whilst also protecting sensitive sites from disturbance and unsustainable pressure.

**23 Green Infrastructure and Natural Environment**

The Council is proposing a raft of new studies to assist with policy development for green infrastructure and the natural environment; these include a Parks and Open Spaces Strategy, a Biodiversity Action Plan (BAP), a Watercourse and Flood Risk Management Plan and a Natural Capital Account. Account should also be taken of the Authority's PDF Area 3 Proposals, the Landscape Strategy as it relates to the borough, the Authority's recent revised BAP 2019-2029 and the Lee Valley Regional Park Cycling Strategy 2017. This point is raised in the Authority's response attached as Appendix A to this report.

**24 The discussion under this section identifies important policy objectives which are relevant for the Park; the Council propose to:**

- continue to protect and enhance biodiversity at designated and non-designated sites with an emphasis on net gains;
- provide opportunities to improve access to nature and diverse green spaces through policy to enhance cycling and walking routes and establishing green links between existing open spaces; and
- explore the delivery of new open spaces in areas of deficiency such as in the east of the borough.

The Council recognise the value of open space to address health inequality, and its contribution to mitigating climate change, addressing overheating and offering solutions for flood management. There is also recognition of the important role open space played in the current Covid 19 crisis and why additional open space provision is so urgent.

**25 Policy support for the Authority's remit, the Regional Park, and the PDF Area Proposals is required as part of the Local Plan. A clear policy statement supporting the Regional Park, its biodiversity and its enhancement in line with the PDF Proposals, as both a local asset and a regional resource forming part of London's green infrastructure would provide developers with certainty when considering the location, design and scale of development. Further comments are set out in the letter attached as Appendix A to this report.**

**26 Active Travel**

The discussion under this section raises relevant issues in relation to the Park and how people are able to move through and into the open spaces. Reference to improving the balance of space given to people to dwell, walk and cycle so that space is used more efficiently, is important as development densities increase. The PDF Area 3 Proposals seek to tackle improvements for pedestrians and cyclists in respect of key movement routes such as Ferry Lane in order to change the emphasis from a main road through the Park, to a 'Park Road' where people can move safely on foot or cycle between Park sites. Officers will need to engage with the Council's Walking and Cycling Action Plan with this in mind.

**27 Economy – Visitor Infrastructure**

Support for visitor accommodation and infrastructure should be covered by policy but needs to extend to include the Regional Park. The Tottenham Hale area of the Park (within the Lee Valley Opportunity area) is well served by public transport and walking and cycling routes and although the main site with potential for visitor accommodation or other associated visitor infrastructure at Hale Wharf is now no longer available, other opportunities may come forward

over the life of the Local Plan. Consideration could be given to how visitor facilities might be improved at Stonebridge Lock for example in association with water based visitor accommodation and land based cultural activity.

- 28 The Council is also carrying out a 'Call for Sites' exercise as part of the Local Plan engagement to establish what sites are potentially available in the borough for development for housing, economic development and other uses. Officers will review the Authority's landholdings in relation to this process and initiate discussion with Haringey as appropriate and as part of a wider Duty to Co-operate meeting.

#### **ENVIRONMENTAL IMPLICATIONS**

- 29 There are no environmental implications arising directly from the recommendations in this report but the First Steps engagement draft Local Plan for Haringey will, once adopted contain policies that guide and control development and the use of land within the borough that could have an impact on the protection, enhancement, and development of the Regional Park.

#### **FINANCIAL IMPLICATIONS**

- 30 There are no financial implications arising directly from the recommendations in this report.

#### **HUMAN RESOURCE IMPLICATIONS**

- 31 There are no human resource implications arising directly from the recommendations in this report.

#### **LEGAL IMPLICATIONS**

- 32 Planning applications referred to this Authority are submitted under the consultative arrangements of Section 14 (4-7) of the Lee Valley Regional Park Act 1966 (the Park Act). The Park Act requires a local planning authority to consult with the Authority on any planning application for development, whether within the designated area of the Park or not, which might affect any part of the Park.
- 33 The Park Act enables the Authority to make representations to the local planning authority which they shall take into account when determining the planning application.

#### **RISK MANAGEMENT IMPLICATIONS**

- 34 There are no risk management implications arising directly from the recommendations in this report.

#### **EQUALITY IMPLICATIONS**

- 35 There are no equality implications arising directly from the recommendations in this report.

---

Author: Claire Martin, 01992 709885, [cmartin@leevalleypark.org.uk](mailto:cmartin@leevalleypark.org.uk)

## **BACKGROUND REPORTS**

The New Local Plan First Steps Engagement November 2020  
consultation.

Integrated Impact Assessment (IIA) Draft Scoping November 2020  
Report

## **APPENDICES ATTACHED**

Appendix A	The Authority's draft response to the London Borough of Haringey
Appendix B	Plan showing the Park area within the borough of Haringey
Appendix C and attachment to the Letter at Appendix A	PDF Area 3 Proposals Walthamstow Wetlands to Tottenham Marshes

## **LIST OF ABBREVIATIONS**

AAP	Area Action Plan
PDF	Park Development Framework
SSSI	Site of Special Scientific Interest
IIA	Integrated Impact Assessment (IIA) Draft Scoping Report
HRA	Habitat Regulations Assessment
DPD	Development Plan Document
AAP	Area Action Plan
SPA	Special Protection Area
the Park Act	Lee Valley Regional Park Act 1966





Mr. Bryce Tudball  
Planning Policy Team Manager  
Haringey Council  
6<sup>th</sup> Floor, River Park House  
Wood Green  
LONDON  
N22 8HQE17

Email: [cmartin@leevalleypark.org.uk](mailto:cmartin@leevalleypark.org.uk)  
Direct Dial: 01992 709885

21 January 2021

Dear Bryce

**RE: CONSULTATION ON HARINGEY'S NEW LOCAL PLAN FIRST STEPS  
ENGAGEMENT CONSULTATION (REGULATION 18)  
LEE VALLEY REGIONAL PARK AUTHORITY COMMENTS**

Thank you for consulting the Regional Park Authority on the New Local Plan First Steps Engagement consultation.

A report on this matter was considered by the Authority's Members at the Lee Valley Regeneration and Planning Committee on the 21 January 2021 when the following comments were agreed. Officers would welcome further discussion on the detail of comments as part of the Duty to Co-operate process, particularly in relation to how the Local Plan can support the Regional Park and its function as both a green infrastructure and leisure asset for the borough and the wider London region.

**Lee Valley Regional Park and Statutory requirements of Lee Valley Regional Park Act in relation to Local Plan documents**

The Lee Valley Regional Park is a significant leisure and environmental asset to the Borough providing valuable benefits to local communities. Located within one of the Borough's key regeneration areas, the Lee Valley Opportunity Area, the Park's recreational open spaces and waterside sites and biodiverse landscape can assist the Council in meeting the challenges and opportunities identified in the new Local Plan document; for example by providing green space to support active and healthy lifestyles, and as an environmental resource that can help combat the effects of climate change and create attractive local environments rich in culture and biodiversity. Existing cycle and walking routes within the Park connect with the local urban areas and public transport nodes in the east of the borough linking Haringey residents and visitors to the rest of the Regional Park and its leisure sites and venues to the north and south.

The Regional Park should be acknowledged as a key part of the Council's Vision for 2037 – part of the “unique natural, physical and cultural assets” that the Council states will be enhanced and celebrated. It includes the large open recreational spaces of Tottenham Marshes, Hale Wharf, now the site of Hale Village, the East Hale Allotments and the waterways of the River Lee, the Navigation and the Pymmes Brook Flood Relief Channel. Key visitor attractions are present at the Waterside Centre at Stonebridge Lock, the Paddock Community Nature Reserve and Markfield Park (in total approx. 77 hectares or 1.9% of the Regional Park lies within Haringey).

The Authority supports the need to refine the London Plan “good growth” objectives to take account of the specific local circumstances found within Haringey. The meaning of good growth in relation to the Regional Park and the Lee Valley Opportunity Area should be considered in this respect; development within the Tottenham Hale area has to date brought considerable change to land within and adjacent to the Park much of it considered by the Authority to be to the detriment of the Park both in terms of visual and landscape impacts. As sites are completed there will be further impacts on the ecology, recreational enjoyment, tranquillity and other benefits usually associated with the general use of the Park and policy will need to ensure future development does not erode further these benefits, but rather achieves a net improvement.

It will be important going forward that the Local Plan recognises the statutory requirements of the Lee Valley Regional Park Act 1966 (the Park Act) and that policy includes full reference to the Authority's Park Development Framework and the proposals contained within as they relate to the Regional Park within Haringey. In the 'First Steps' document the Council highlights the importance of compliance with statutory requirements (page 10). 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 even though 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 new Local Plan. The Area Proposal are included as an attachment to this letter.

The evidence base for the new Local Plan will also need to take account of the Authority's Landscape Character Assessment and Landscape Strategy April 2019, the Lee Valley Regional Park Cycling Strategy 2017 and the Lee Valley Regional Park's Biodiversity Action Plan 2019 - 2029. Further discussion between officers as part of the Duty to Co-operate process would be helpful to progress these points and to ensure collaboration in respect of future evidence base work. For example, the Authority would be interested in the details of the Council's Action Plan for Walking and Cycling and proposals to produce an Infrastructure Delivery Plan. The HRA will also be important in relation to

adjoining sites; Walthamstow Wetlands SSSI part of the Lee Valley SPA/Ramsar site. Likewise, the Parks and Open Spaces Strategy, the Haringey BAP, the Watercourse and Flood Risk Management Plan and the Natural Capital Account are all of interest to officers.

**Area 2: Northumberland Park, Tottenham Hale and South Tottenham.**

The Authority welcomes the recognition given to the Park's ecological assets as part of the key characteristics of Area 2. The Opportunities Identified are also recognisable to the Authority in terms of its own PDF Area 3 Proposals for the Tottenham Hale section of the Regional Park.

Greater emphasis should be placed on safeguarding, recreating and enhancing what remains of the ecological assets in this area and how policy can improve the robustness and longevity of these fragile assets going forward given the significant pressure that will be brought to bear on what currently exists, through increased use and disturbance. The need to continue improving the quality of the green spaces of the Regional Park alongside improved access to open space and nature is supported as is the need to ensure development supports the creation of a walkable and cycle friendly environment. Policy will also need to ensure future development or changes of use within the industrial estates in Area 2 provide sufficient on site green space, for both recreation and biodiversity, to complement what exists within the Regional Park.

The Authority seeks further detail about the Council's statement that a review of green belt boundaries is proposed in order to assess whether they remain appropriate, in line with national planning policy and the London Plan. An early indication as to whether the review will consider green belt land within the Regional Park would be helpful, particularly if this includes the Authority's landholdings.

**Borough Priorities**

Many of the points made above are relevant to discussion presented in the First Steps document under the section on Borough Priorities – Place (5.3), in particular the Authority wishes to comment on matters relating to Design, Heritage and Culture, Green Infrastructure and Natural Environment, and Active Travel.

**Design**

The Authority welcomes the emphasis placed on the importance of protecting and enhancing natural assets because of their multiple health and well-being benefits as well as the intrinsic environment and eco-systems benefits for the borough, in the section on Design (5.3.1).

The Authority would support the inclusion of Policy in the Local Plan that could reinforce protection for these areas – such as the Regional Park, and help to create and protect a network of additional sites and corridors with recreational and biodiversity values as part of the design strategy for the borough. These would need to be substantial areas especially if sites of biodiversity value are

to thrive alongside more active spaces. Policy will need to address the balance between achieving these design objectives and the objective of 'optimising densities' with all the challenges that tall buildings bring in relation to a valley corridor such as the Regional Park.

The impacts on the Park areas resulting from the current scale and density of development has yet to be understood. Now that those sites identified in the Tottenham AAP and considered as suitable for tall buildings have been developed out, policy should ensure that any further development adjacent to the Park and its waterside environment is of a moderate, low rise and appropriate scale.

### **Heritage & Culture**

The Authority would support a clear vision for heritage and culture as part of the New Local Plan. The Park area within Haringey is defined as an Archaeological Zone and there are important heritage assets associated with Markfield Park and the waterways. The Authority has limited expertise in this area and would welcome joint working to unlock the heritage potential of the Park's assets and open spaces both for local communities to engage with and as another element of its visitor attractions and site management.

Cultural activity on open spaces if sensitively managed can encourage a greater use and connection with the environment, but policy will need to ensure sensitive sites are protected from noise and other disturbance.

### **Green Infrastructure and natural environment**

Recognition of the Regional Park as a significant recreational asset within the Borough and as part of the Lee Valley Opportunity Area is welcomed. Local Plan Policy will need to support the Regional Park and its recreational role in association with the many other roles it performs, some of which are mentioned in the First Steps consultation. In particular, the combination of the Park's open spaces, waterside sites, heritage and biodiversity contribute to addressing health inequalities. They also assist with mitigating climate change; in relation to flood and water management and addressing overheating (the urban heat island effect), and of course more recently have provided a vital resource for people to enjoy during the current Covid 19 crisis.

The Authority is seeking an overarching policy for the Regional Park and the Authority's remit as detailed above, and this might sit within a Local Plan section on Green Infrastructure. However, there is also a need to ensure that policy within other sections of the Local Plan identifies opportunities and mechanisms to protect and enhance the Regional Park and the many roles it performs. For example, Policy that covers the Area 2 Northumberland Park, Tottenham Hale and South Tottenham, and Policy in relation to Design, will need to consider how the future potential adverse effects on the Regional Park of higher density development and growth targets can be prevented and where benefits can be delivered – such as new open spaces, and the creation of new habitats.

The continued protection and enhancement of biodiversity on both designated and non-designated sites is supported. This will become increasingly important as the development densities increase and people live their lives further removed from open spaces and the semi-natural environment. Ecological links between these sites i.e. through provision of street trees, green/brown roofs, pocket parks will also need to be considered. Robust policy will need to ensure biodiversity net gain is achieved – the Park may offer opportunities for off-site provision in this respect, although on site provision is preferred in the first instance especially where it can complement and buffer habitats within the Park. Ecological assessments will be important in this respect and policy must ensure these are undertaken from the earliest stages of the pre-application process to ensure provision of biodiversity benefits in accordance with the principals of net gain. Opportunities to improve access to nature and diverse green spaces should also be considered.

Policy should consider the ecological function of the many waterways that exist within the Park in the eastern part of the Borough and the issue of the water environment and water quality more generally. Reference to the Authority's BAP may be helpful in this respect.

### **Active Travel**

The Council's work on Active Travel and emphasis on improving walking and cycling infrastructure is supported. Ensuring that sufficient space within development sites is set aside for walking and cycling in association with facilities such as pocket parks, cycle parking and safe crossings will increase the attractiveness of these modes of travel especially where these routes connect with the Regional Park and other green infrastructure.

The PDF 3 Area Proposals also sought to improve the quality of Ferry Lane for pedestrians and cyclists and to reduce its impact on the openness of the Regional Park. Policy should address key movement routes such as Ferry Lane in terms of improving the public realm, strengthening landscape planting, safeguarding views – in this case across the Park – and the creation of pedestrian reserves to facilitate safe access across the road and onto strategic off road routes such as the Lee Valley Pathway. Officers would welcome engagement on the Councils Walking and Cycling Action Plan – this will need to take account of the Authority's recent Cycling Strategy.

### **Economy - Visitor Infrastructure**

The Authority would welcome the inclusion of policy within the Local Plan that supported the provision of visitor facilities including accommodation and associated infrastructure. This policy should consider the Regional Park as an 'accessible location' in this regard, together with its role as a tourist or visitor attraction. The Park area associated with the Lee Valley Opportunity area and Tottenham Hale is well served by public transport, walking and cycling routes and there are opportunities to be explored in association with sites within the Regional Park, such as improving the visitor facilities at Stonebridge Lock for example, in association with water based visitor accommodation and land based cultural activity. Opportunities might also come forward during the life of

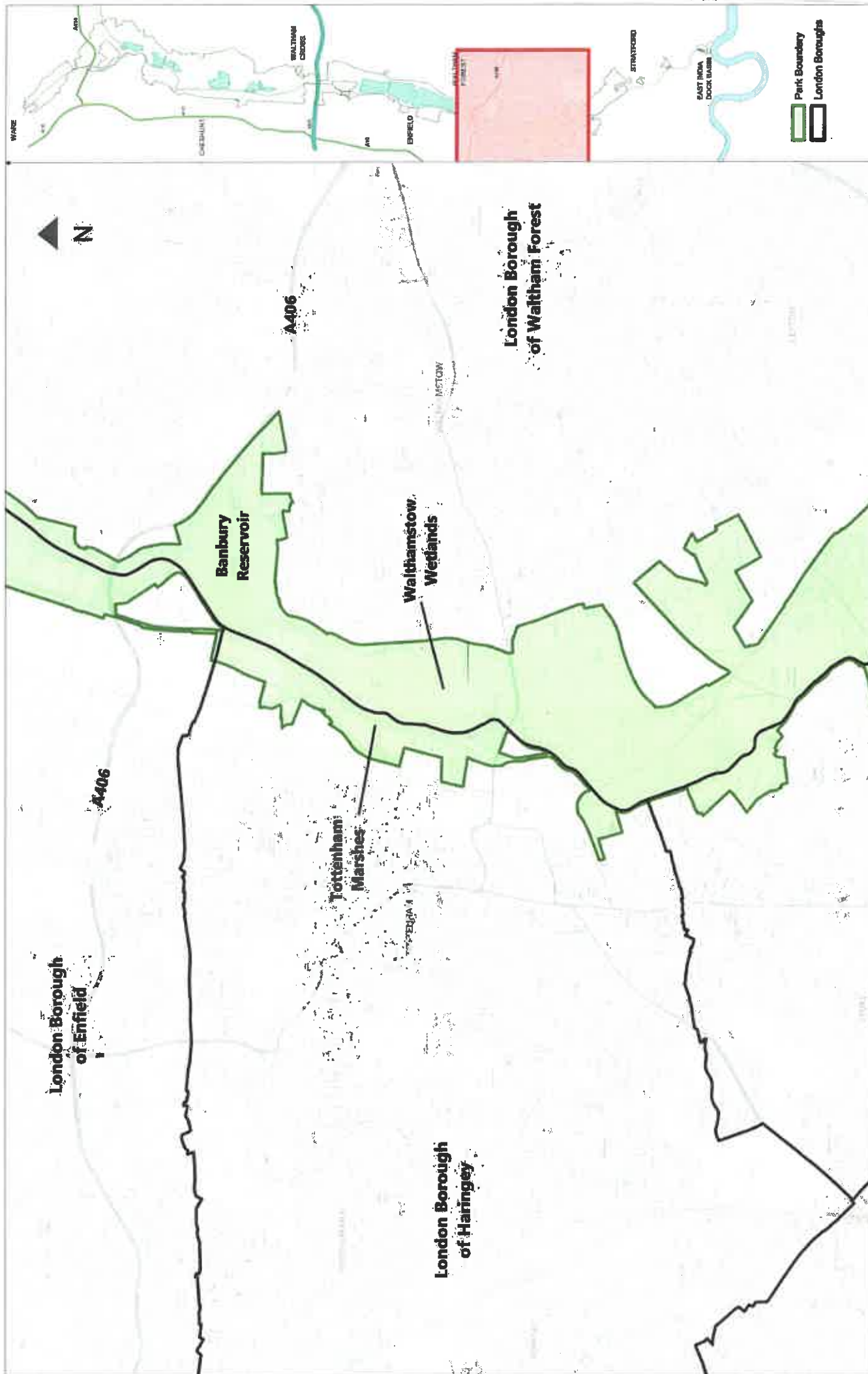
the Local Plan within existing residential and industrial sites that are located within or adjacent to the Park. Visitor facilities in these locations would offer a good base from which to explore the other parts of the Regional Park.

The Authority looks forward to engaging further with Borough officers on the matters raised above as part of the Duty to Co-operate process to help inform the next stage of the Local Plan process.

Yours sincerely

**Claire Martin**  
**Head of Planning**  
**Lee Valley Regional Park Authority**

Enc.



Lee Valley Regional Park within London Borough of Haringey

1:35000 @ A4  
23.12.20

Produced by: Corporate GIS (AAB)  
M:\Cadcorp Critical Data\User Specific Maps\Create Maps 2017 - 20\Area Action Plans\2016 LA within LVP Maps\LB Haringey 2020 (AB) 231220-PT

© Crown Copyright and Database rights 2020. Ordnance Survey 100019982



**This page is blank**



**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.**

Visitors		Sport & Recreation	Biodiversity	Community	Landscape & Heritage	Environment
<b>3.A.2</b>	<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. Support the ongoing protection, refurbishment and interpretation of existing buildings and features of heritage interest.</p>

<p><b>3.A.4</b></p> <p><b>Tottenham Marshes, Hale Wharf &amp; the Paddock</b></p>	<p>Enhanced visitor hubs to be established at two locations:</p> <p><b>1) <u>Stonebridge Lock</u></b></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><b>2) <u>Hale Wharf</u></b></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>
---	---

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.

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.

Opportunities for a visitor water taxi service to be explored with the Canal and River Trust and other stakeholders.

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.

Cycle hire facilities to be developed including facilities for the Lee Valley Cycle Ability Club with adapted bikes available for hire.

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>
	<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>
	<p>Work with the Environment Agency and other stakeholders and user groups to improve the biodiversity value of</p>

		<p>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><b>3.R.1</b></p>	<p><b>Ferry Lane &amp; Forest Road</b></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"> <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>
---------------------	--	---



