



7th August 2009

Hackney Council
Regeneration and Planning Division
263 Mare Street
London
E8 3HT

By email

Dear Mr. Hodson,

Hackney - Local Development Framework Core Strategy Proposed Submission Document Consultation

Thank you for your recent consultation regarding the Core Strategy Proposed Submission DPD.

As you know, British Waterways (BW) is a public corporation, which is sponsored by DEFRA. We manage and care for more than 2,000 miles (3,220 kms) of canals and rivers in England, Scotland and Wales on behalf of the British people. The Government charges us to:

- Maintain and develop Britain's inland waterways in a sustainable manner, so that they fulfil their full economic, social and environmental potential;
- Fulfil statutory navigation functions;
- Conserve waterway heritage and environment for the future;
- Promote and enable rural and urban regeneration;
- Maintain and enhance leisure, recreation, tourism and educational opportunities for the general public; facilitate waterway transport; and
- Play a lead role in co-ordinating with other UK navigation authorities.

BW's Corporate Strategy and Mission Statement set out the following:

- The business is to manage the inland water system efficiently for the increasing benefit of the United Kingdom;
- BW aims to provide safe and high quality environment for customers, staff and local communities;
- BW takes a commercial approach and strives for excellence in every aspect of work; and
- The heritage and environment of the waterways will be conserved, improved and made to work well for future generations.

We work extensively with private, public and voluntary partners to conserve, enhance and improve these waterways. Our expertise and responsibility for waterspace, combined with their ownership of docks, canals and waterside properties, puts us in a unique position to facilitate redevelopment for both economic and environmental gain. The canals in particular have historically experienced a prolonged period of decline. In recent years, the canals and river navigations have experienced

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Grand Union Canal Regents Canal London Docklands River Lee Navigation River Stort Navigation



significant development pressures from commercial, residential and tourism/recreation developments. Attractive waterside environments have stimulated this interest and been at the heart of some of the most significant regeneration schemes in London.

BW's local vision for the London region is that Canals and Docks achieve a recognition and status of other historic London landmarks, occupying an important role in the strategic planning and regeneration of the capital city. A commitment to quality service and facilities will see visitor and boating activity double in the period up to 2012, and with a more engaged community, local pride and ownership will be engendered. Increased, but sustainable use of the canal and dock system, with appropriate balance between vibrancy and tranquillity, underpinned by our commercial activity will ensure their long-term prosperity'.

In recognition of the pivotal role of the waterways in the planning and development processes, BW has produced 'Waterways & Development Plans' (2003) to guide the key stakeholders in the process of integrating the inland waterways into the development plan system. Your attention is also drawn to 'Waterways for Tomorrow' (DETR 2000 – but currently being reviewed in advance of a refreshed document being published) and 'Planning a future for the Inland Waterways' (Inland Waterways Amenity Advisory Council 2001). The Town and Country Planning Association has also recently published the policy advice note 'Inland Waterways' in cooperation with British Waterways (July 2009).

We have also previously met with the consultants, Urban Practitioners, to discuss their production of a planning framework for the Lea Bridge Road area (both sides of the River Lee Navigation) on behalf of the partnership with LB Hackney and LB Waltham Forest, Lea Valley Park and Design for London, which LB Waltham Forest currently have out for consultation (Lea Bridge Area Issues and Options). We feel that reference should be made to this in the Core Strategy.

Please find attached British Waterway's comments on the Core Strategy Submission Document consultation, which should therefore be considered in the context of the above documents, policies, guidance and advice.

4 Delivering Sustainable Growth

The waterways can provide opportunities to deliver sustainable growth by facilitating the following sustainability measures in the design and construction of waterside developments:

- Using waterborne freight transport for transporting demolition and construction waste, construction materials (as mentioned above), household and commercial waste & recyclates and other low value, bulky, non time sensitive goods and products;
- Sustainable urban drainage systems (SUDS);
- The maximisation of 'grey water' instead of valuable fresh water resources; and

- The use of the canal water source for heating/ cooling systems (*factsheet attached for more info*) as well as for generating hydro-electric power, with, for example, turbines in lock chambers; and
- Sustainable transport by creating and improving convenient walking and cycling routes along the waterway towpath (as stated on page 6-7 of the recent TCPA Policy Advice Note for Inland Waterways referred to above, for every 1km of upgraded towpath 100 tonnes of carbon dioxide (CO₂) is saved).

The LDF should therefore promote the Regent's Canal and Lee Navigation's potential for delivering sustainability and sustainable growth, and should ensure that developers are required to consider the feasibility of these sustainable options for development within reasonable proximity to the waterways.

New Communities

Hackney Wick

4.36 The water based north-south green corridor running through East London should be identified, as the River Lee Navigation and the Old River Lea.

4.38 We are pleased to note the reference to the Olympics and the requirement for development to take advantage of its waterside location, although we feel that the Core Strategy could put more emphasis on the Olympic Park site and the potential opportunities it provides as one of Europe's largest regeneration projects. Reference should be made to further guidance for waterside development, such as waterways policy and the Waterfront Development SPD.

Core Strategy Policy 5 – Hackney Wick New Community

With regard to flooding, the waterways can help to alleviate areas with flooding pressures.

Improved connectivity to the waterways from new developments can also assist walking and cycling opportunities. Developments should contribute to these.

4.40 AAP Hackney Wick

British Waterways would also be pleased to be involved in the area action plan for this area.

4.41 In addition to the LDA and ODA, British Waterways are a key stakeholder in the future of Hackney Wick, if not a delivery partner.

4.42 As above, British Waterways should be acknowledged as a key stakeholder with regard to surface water management.

Indicators to Monitor Delivery of Policy 5

In certain locations British Waterways has pedestrian and cycle counters on the canal towpath, and the results collected from these could be used to demonstrate increased walking and cycling from improvements undertaken.

Policy 6: implementation and monitoring

We agree that new development should contribute to improvements to transport and the public realm (4.46) and that users of new development should be able to prioritise walking and cycling. This should be addressed specifically in the waterways policy 28, or subsequent more detailed waterfront SPD.

Infrastructure

Core Strategy Policy 7 Working with Infrastructure Partners

British Waterways should be recognised as an infrastructure provider in the borough, and we would welcome the opportunity to meet with the Council to discuss our infrastructure requirements, and should the Council decide to pursue CIL, how this could be used to improve waterway infrastructure, environs and facilities. British Waterways is keen to discuss how:

CIL revenue generated from waterside development or regeneration of sites adjacent to or otherwise benefiting from the canal could be used to improve waterway infrastructure, environs and facilities; and

the Council and BW can work together to ensure that waterway infrastructure does not fall between CIL and the proposed scaling back of planning obligations.

Indicators to monitor delivery of Policy 7

We are keen to work closer with Hackney to monitor s106 contributions and delivery of s106 funded projects. We currently find it difficult to monitor contributions secured, and to feed these meaningfully into our programme of works in order to deliver improvements, as we do not receive planning application decision notices and are not regularly kept updated of application progress.

We regular meet with LB Tower Hamlets' s106 Officer to review planning application agreements to ensure effective and successful delivery of s106 improvements, and would be pleased to make similar arrangements with LB Hackney.

Supporting Neighbourhoods and Communities

Table 5.1 Social Infrastructure Delivery

The waterways provide a valuable element of social infrastructure in providing facilities to promote health and wellbeing and should be acknowledged here.

Core Strategy Policy 8

As above, British Waterways should be recognised here as an infrastructure provider in the borough.

Map 5.1 Social Investment Areas

Given their importance in providing valuable social infrastructure, the waterways should be identified on this map.

Investing in Education

We would suggest that the council consider utilising some s106 contributions to support the floating classroom/electric barge Beauchamp Lodge (<http://www.beauchamplodge.co.uk/>), which navigates the Grand Union Canal and Regent's Canal providing a unique learning environment and community space, and is based in Little Venice. This electric barge provides a great

community and learning facility, and as well as being supported as a valuable facility, we consider that new waterside developments should be encouraged to include a mooring point for the barge, preferably with an electricity connection, where appropriate.

Lifelong Learning

5.28 BW can assist programmes addressing worklessness - we often work with voluntary groups involved in work along the towpath, improving skills and helping to reduce worklessness.

Health Investment and Infrastructure

The waterways provide access to open space and the natural environment, which constitutes supporting health infrastructure that offers benefits for physical and mental health, and improves quality of life.

Health and the Environment

As referred to above, and later at para 8.29 - Open Space Network, the waterways are multi-functional resources, that benefit the health and wellbeing of the borough's population.

5.45 The NICE publication mentioned, 'Promoting and creating built or natural environments that encourage and support physical activity', refers to canal towpaths as part of public open spaces that should be designed and maintained to provide convenient safe and attractive access (p8).

Core Strategy Policy 12 – Health and the Environment

Supporting infrastructure such as open space and the waterways should be included here, and its benefit to the borough's residents' quality of life acknowledged.

6 A Dynamic and Creative Economy

Business barges such as those at Tottenham Hale and Paddington Basin provide an ideal location for SMEs and should be considered as a complementary water based use where appropriate as part of waterside developments.

Employment Opportunities

6.35 As above, BW can assist programmes addressing worklessness - we often work with voluntary groups involved in work along the towpath, improving skills and helping to reduce worklessness.

6.36 As above, we would suggest that the council consider utilising some s106 contributions to support the floating classroom/electric barge Beauchamp Lodge, to provide a unique learning environment and community space available for education providers and other groups.

6.45 Business barges provide an ideal location for SMEs and should be considered as a complementary water based use where appropriate in waterside locations.

Core Strategy Policy 17 – Economic Development

We are concerned about the wording of the 5th paragraph under this policy, that encourages B2 and B8 uses to use canals as physical barriers. Existing industrial sites that no longer make use of

the adjacent waterway fail to maximise their full potential, and can create unsupervised and intimidating areas of low quality open space. Instead of minimising inherent environmental impacts from industrial activity to the surrounding area, the industrial use will adversely affect the potential biodiversity, tourism, leisure and recreation opportunities presented by this resource. Rather than being seen as a physical barrier – waterways should be seen as the heart and focus for the design of waterside sites.

We would also object to the statement that mixed development proposals in these locations will not be approved, as the waterways can provide a catalyst for regeneration in run-down industrial areas, as to be demonstrated with the Olympic Park, and we feel that in some former industrial areas, sites should be released for mixed use developments and uses that maximise the potential of their waterside setting.

6.51 As owner of several of the waterways running through the Olympic Park site, we are very keen to be involved in discussions regarding employment land and future uses as part of the Olympics and Legacy development.

6.53 As mentioned above, business barges, such as those already in use at Paddington Basin and Tottenham Hale provide unique work spaces for SMEs, and their inclusion in waterside developments should be encouraged where appropriate.

Core Strategy Policy 18 – Promoting Employment Land

As above, and discussed in further detail as part of our comments on the Proposals Map, below, canals are historically linked with industrial uses and employment areas, but there are many examples where these have promoted successful regeneration. We are therefore concerned about the initial sentence in this policy that appears to put a blanket hold on the consideration of former employment land – we feel that this should be amended to consider this where it is appropriate to the area.

7 Providing Better Homes

Housing and Provision for Gypsies and Travellers

Although those who wish to live or stay on ‘houseboats’ do not have the same legal rights to sites as Nomadic Peoples, the council should recognise that it may be necessary to make appropriate provision in a DPD, SPD or Action Area Plan for residential moorings, either for permanent accommodation or to facilitate visitors, subject to British Waterways Board support for chosen locations. Their potential for providing a flexible type of housing that animates the waterway should be highlighted, and should be included as part of the waterway policy and SPD.

8 Cleaner, Greener and Safer Places

High Quality Design and Historic Environment

The canal forms part of Hackney’s local distinctiveness. It also forms part of its historic heritage.

Design

8.6 Unsympathetic development and under-utilised or empty buildings particularly include those that abut, and turn their back on, the waterways, without utilising this asset.

8.9 The waterways and their towpaths form part of Hackney's public realm that promotes permeability, and helps to link up green infrastructure and neighbourhoods for pedestrians and cyclists.

8.10 The Sustainable Standards for the Built Environment SPD should encourage waterside developments to utilise the canal for the following sustainable measures described above:

- Using waterborne freight transport for transporting demolition and construction waste, construction materials (as mentioned above), household and commercial waste & recyclates and other low value, bulky, non time sensitive goods and products;
- Sustainable urban drainage systems (SUDS);
- The maximisation of 'grey water' instead of valuable fresh water resources; and
- The use of the canal water source for heating/ cooling systems and for generating hydro-electric power.

Within Hackney, the Waterhouse Café at Klein Wharf in Orsman Road, operates heating and cooling using the canal water, and we have several examples elsewhere along our network that we can provide details of in order to encourage its take up.

Core Strategy Policy 24 – Design

We support the proposal for 'enhancing the Public Realm and ensuring good connection into existing routes, movement patterns and streetscape' and to 'reducing barriers to movement' along the waterway to improve access to, onto and along the water.

We are pleased to acknowledge the reference to Under Lock and Quay at para 8.15, but would also like to see it referenced here with 'Secure by Design'.

Historic Environment

8.18 It is not just buildings of heritage value that should be acknowledged, but also structures such as air raid protection (ARP) gates, bridges, horse ramps and other associated details such as valves and water pipes.

8.19 We would be keen to discuss entering into a Conservation Management Agreement with the Council regarding conservation areas that cover our waterways.

Open Space Network

Table 8.1 We assume that the Linear Open Spaces referred to in the table refer to the waterways.

8.29 We support the recognition of open space as multi-functional.

8.31 The maintenance of an area of public realm could be managed as part of large developments, as examples at Paddington Basin and Limehouse Basin and Kings Cross have successfully demonstrated. British Waterways sees such management agreements as essential to manage the increased burden of maintenance/litter connection associated with additional residents and visitors from regenerated areas utilising the benefits of the waterways, and are very keen to discuss how this might be implemented as part of new developments.

We are not aware of having been consulted on the approved Public Realm Strategy, and would request that this be sent to us (preferably electronically).

Open space deficiencies can be addressed by improvements to the existing open space resource of the canals and waterways, particularly suitable for leisure and informal recreation.

8.33 We would like to be consulted on the forthcoming Public Realm SPD.

8.34 The recently published TCPA policy advice note 'Inland Waterways' should also be referenced here.

Biodiversity

Amongst our many statutory duties, we have a duty to promote and enhance the flora, fauna and biodiversity of our network. Nationally, we manage a significant number of Sites of Special Scientific Interest, Ramsar sites, and Metropolitan Sites of Nature Conservation Importance. In all developments (whether ours or by a third party), we examine the ecological impact and recognise the ecological value that the multi-functional canal has, and that the ecological value (current or potential) of a site has to be weighed up against a significant number of planning considerations and wider objectives. We are therefore keen to remind the LPA that the primary function of our waterways is for navigation, and ecological enhancements should not hinder this. There are a variety of mitigation measures that can be introduced as part of development that will not hinder navigation. More detail is provided on these below, in response to the Core Strategy Policy 28.

Water and Waterways

We are very pleased to see the value of the waterways recognised by the inclusion of this section in the Core Strategy. It is BW's vision that the our waterway network will be regarded as one of the nation's most important and valued national assets.

8.49 We support the acknowledgement here of the value of the waterways to natural habitats, heritage and local character, but reference should also be made to the potential of the waterways for delivering tourism, regeneration, education, sport, leisure and recreation, sustainable transport and renewables.

There is also little mention of the waterways in the context of the Olympic Park site. The preparation for the 2012 Games is providing a huge regeneration of the area, and due to its location within the Old River Lea, Lee Navigation, and Bow Back Rivers, it offers a fantastic opportunity to revitalise these waterways and bring them back into public use. We are concerned that the benefits of the waterways as the most unique and unrivalled asset of the Olympic Park could be overlooked in the Core Strategy. We are working closely with the Olympic Delivery Authority (ODA) and the London Development Agency (LDA) to deliver transformed waterways that will bring life and animation back to the Bow Back Rivers with new and improved access to, along and on the waterways, an appropriate mix of moorings, sustainable transport and new community facilities integrated at the heart of one of Europe's largest regeneration projects in Games and well beyond into Legacy as part of our vision for the 'Amsterdam' of East London.

We believe that the Core Strategy should bring out the value of the waterways for 2012 and beyond, and be more closely aligned with the vision of the Lower Lea Valley Opportunity Area Planning Framework (LLV OAPF).

Core Strategy Policy 28

While we strongly support the principle of a waterways policy, we are concerned, as above, that the focus of the policy is mainly towards natural habitats and biodiversity, which overlooks the full potential of the waterways to help deliver many other strategic aims of the Core Strategy (including education, health and wellbeing, leisure and recreation, tourism, housing, sustainable transport etc).

In particular, we are very concerned at the proposal for waterside development to incorporate an undeveloped buffer strip along the watercourse. As explained above, we have a duty to protect the flora, fauna and biodiversity of our network. As the owner and the navigation authority of the canal, and the relevant statutory consultee, it is not our policy (and will not be) to require a buffer strip along our waterways. The canal in particular was built as, and remains, a working body of water characterised by buildings that are close to, and in inner London locations, often rise sheer out of the canal on the offside (non-towing path side). This is a reflection of the direct physical and functional relationship between the canal's structures and its historic industrial uses for the transporting of goods by water. In the current context, we consider that it is appropriate for a wider range of uses and buildings to have close relationships with the canal to, amongst other things, promote visual and physical integration with the canal, to allow natural surveillance and views across the canal, as well as providing interesting visual features for boaters and towpath users.

Waterside redevelopments offer great opportunities to introduce visual interest and integration, natural surveillance, improvements to the condition and appearance of the waterway infrastructure, as well as ecological enhancements through appropriate landscaping schemes (in consultation with us). It is therefore a major concern to us these objectives are potentially being compromised on canalside sites throughout Hackney due to the requirement of a buffer strip. This blanket approach does not necessarily enhance biodiversity or provide suitable ecological habitats as part of developments, but would certainly lead to other negative outcomes, such as creating a divide between the canal and the development, resulting in a 'dead', sterile space, vulnerable to becoming untended, attracting litter and becoming unsightly, as is evident at the development in the photograph below, where this was enforced:

[See picture 1 in Appendix A]

This therefore fails to enhance the setting of the canal, while precluding opportunities to create an active waterspace, and fails to make the best use of this unique asset of a waterside development. We support the promotion of an enhanced waterside with improved access for pedestrians, and moorings for waterway users, but feel that this, and the aims for this area as outlined in the Core Strategy, will not be successfully achieved with a buffer strip.

While we acknowledge that waterside buffer zones can be appropriate for some waterside sites, this approach does not always guarantee enhancement benefits, and should not be at the cost of a successful canalside redevelopment and its associated regeneration benefits. Ecological enhancements as part of waterside developments can be incorporated in a variety of other ways to a buffer strip. Developments can often incorporate marginal planting adjacent to the waterway wall, without hindering the canal's primary function for navigation. The wall can be clad in

appropriate locations such as where there are long or unattractive areas of blank wall or sheet piling. This could be planted within a 'trough' with raised sides, bolted onto the waterway wall, and if made from timber would also be aesthetically pleasing when viewed from the waterway. A freeboard of 150mm would allow access/egress by water birds for nesting opportunities, and stop litter from drifting into the plants.

Below are some photographs of different types of successful edge enhancement planting to demonstrate:

[See pictures 2 and 3 in Appendix A]

A net gain in ecological value can also be achieved within development sites through appropriate landscaping and the incorporation of brown and green roofs, and with the installation of bird and bat boxes close to the waterway, which bats are known to use as a feeding corridor. The promotion of these measures can therefore meet the aims of the London Plan policies and Hackney's Core Strategy objectives with regard to biodiversity opportunities. PPS9 and associated documents identify the need for planning decisions to aim to maintain and enhance, restore or add to biodiversity interests within an area, based upon up-to-date information about relevant environmental characteristics. It advises that the aim of planning decisions should be to prevent harm to biodiversity interests.

We are concerned that this requirement within the Core Strategy could set a strong precedent for resisting appropriate waterside developments in the future, suggesting that all such developments must include an area of undeveloped land in order to maximise their ecological offer. In our opinion such an outcome would prejudice the delivery of high quality developments that embrace the water as a multifunctional asset, contrary to national and regional policy for the waterways, and we therefore do not agree with this part of the proposed submission document.

The waterways within the borough include navigable and unnavigable rivers, and canals, which often benefit from very different characteristics. This may mean that they have different requirements from development which aren't always appropriate for both. We would suggest that this be acknowledged here, and separate policy requirements be included to reflect the different approaches that should be applied.

8.51 Planning Documents

Site Allocations Development Plan Document

We look forward to be able to contribute to this document.

Waterfront Development SPD

We have previously been involved with officers regarding this SPD and would be very keen to provide early input. Please let us know when we can meet with officers to discuss it.

Development Control Development Plan Document

This DPD should incorporate a suite of waterway policies to provide more guidance on the protection and enhancement of the waterways in new development. We would be keen to work with the Council in order to helpfully inform appropriate policies.

8.52 The recently published TCPA policy advice note 'Inland Waterways' should also be referenced here, as well as:

- 'Waterways for Tomorrow' (DETR 2000) - currently being reviewed for a refreshed draft and essential as the government's main waterway policy document;
- 'Planning a future for the Inland Waterways' (Inland Waterways Amenity Advisory Council 2001).

Indicators to monitor delivery of Policy 28

BW's ambition is that by 2012 we will have created an expanded, vibrant, largely self sufficient waterway network used by twice as many people as in 2002. We are therefore able to provide the LPA with figures for visitor numbers to our network.

9 Climate Change and Environmental Sustainability

9.2 Sustainable Community Strategy

As the waterways offer significant potential for delivering sustainability aims, as described in detail above, we would like to be involved in the development and any reviews of this document.

9.12 We are keen to be involved early on in the masterplanning of future projects. The Waterfront SPD should guide these, by encouraging the use of heating and cooling and other sustainable options offered by the waterways.

Flood Risk

The waterways can accept surface water discharges and sustainable urban drainage systems.

9.30 British Waterways would like to be consulted on flood risk assessments as a key stakeholder and as part of the Olympic Legacy Masterplan.

Indicators to monitor delivery of Policy 31

We suggest that this should be narrowed to the EA advice on flooding.

Core Strategy Policy 32 – Waste

In addition to the points raised here, we would suggest that sustainable transportation of waste is highlighted, to include the use of the waterways for moving waste, in the interest of sustainable development and to satisfy Blue Ribbon Network Policies 3C.25, 4C.8 and 4C.20 of the Consolidated London Plan (Feb 2008). BW is generally promoting the use of inland waterways for freight transport and jointly with TfL commissioned Peter Brett Associates to investigate the feasibility of freight by water in West London. This work revealed that in certain circumstances (depending on distance and number of locks required to travel through) there is a sound economic case (and environmental and social case) for considering freight by water as a viable alternative to road transport. Clearly, this offers benefits including reduced lorry miles, reduced congestion, reduced carbon emission and reduced number of HGV related accidents. The best practice guidance "The control of dust and emissions from construction and demolition" published Dec 2006 by GLA, together with London Councils states "Where construction sites are located near to

waterways or railways it may be feasible for construction materials to be delivered or removed from the site using these means, rather than by road. The obvious benefit is the reduction of HGV trips on local roads, therefore reducing local emissions and disturbance to sensitive receptors. The Mayor's Freight Plan also seeks to encourage the use of waterways and rail in place of roads whenever practicable.

For new waterside development, construction waste can be removed by water, and during occupation of sites there may also be opportunities for domestic and commercial waste and recyclables to be transported from the site to a Waste Transfer Station by water, as demonstrated by the Council's Waste by Water initiative. As part of planning applications for new development, we request that the LPA require developers to submit a feasibility survey to explore the potential of using the water in this way, and this should also be incorporated in the more detailed waterway policies, and the Waterfront Development SPD. We would be very pleased to continue discussions about how we can jointly promote the use of freight by water, and have recently appointed a Sustainable Transport Manager, Kim Milnes, who will be able to offer any advice. He is available at kim.milnes@britishwaterways.co.uk or on 07917 846765.

Promoting Sustainable Transport

Core Strategy Policy 33 - Promoting Sustainable Transport

The Travel Plans required for new large developments should incorporate the potential for utilising water transport, and for access to and use of the towpaths for walking and cycling, to include parallel routes for cyclists, to avoid conflict with more vulnerable pedestrians in busy areas.

As you will be aware, there is a CRISP (Cycle Route Implementation and Stakeholder Plan) for Hackney, which identifies works for improvement along the waterway towpaths to enhance these pedestrian and cycling links. We are keen that the Council help BW to implement the report's recommendations by directing s106 contributions from development towards it.

Indicators to monitor delivery of Policy 33

As above, British Waterways has some pedestrian and cycle counters on the canal towpath, and the results collected from these could be used to demonstrate increased walking and cycling from improvements undertaken.

Multi-functional roles of Open Space

2.1 We consider that the definitions of open space provided here also describe the values of the borough's waterways.

Appendix 4 Glossary of Terms

62. Green Space (or Open Space)

Canals and waterways (and their towpaths) should be included in this description.

PROPOSALS MAP

Conservation Areas & Open Space

60 The Regent's Canal designation is difficult to make out, but we are pleased to see the canal identified as open space. This should continue for the other waterways in the borough (it is difficult to see if they already are designated in this way).

Priority Employment Areas and Locally Strategic Industrial Sites

The canals and some canonised rivers have an historic relationship with industry and employment uses, when the waterways provided freight transport routes. However, canals and industry no longer have a functional or physical relationship, with the exception of a few sites where effective use is still made of the waterway for freight. We would not, therefore, entirely agree with the designations for the Priority Employment Uses and Locally Strategic Industrial Sites close to the waterways in the Proposals Map. Industrial sites tend to 'turn their back' on the canal and can be a poor neighbour in terms of enhancing the amenity value of the waterways, hampering their potential for delivering other previously mentioned aims. Consideration should be given to releasing these sites for mixed use developments and uses that maximise the potential of their waterside setting, unless they have the potential to utilise their location for waterborne freight transport. Waterside developments should integrate with the waterspace, maximise the potential opportunities and not detract from the attractive character of this asset. This advice is in accordance with the Urban Task Force report "Towards a Strong Urban Renaissance", published in November 2005, which states local authorities' land use designation for areas in close proximity to sites of special amenity value (e.g. rivers, canals, parks, etc) should be reviewed to explore the potential to accommodate more appropriate and sustainable uses that respond to their urban potential.

BW has aspirations to promote recreation and tourism along the waterways and recognises the contribution the change of use of non-residential sites could make to housing targets. The re-allocation of sites currently allocated for industrial and employment uses could be redeveloped in a more sympathetic manner to animate and enhance the water environment, thus making it more attractive for recreation and tourism.

The Proposals Map does not appear to accurately reflect the current planning situation with some of the PEAs and LSISs indicated, as well as some Other Industrial Areas and Strategic Industrial Locations. Kingsland Basin, for example, has in part been recently granted planning permission for a mixed use development, to include residential uses as well as employment, as have many of the sites adjacent to the canal along De Beauvoir Crescent, also shown within the PEA. The principle of mixed use developments rather than strictly employment uses had appeared to have already been agreed for other sites including Rosemary Works on Branch Place, and Wenlock Basin on Wharf Road. Planning permission was also recently granted for a mixed use development on the identified Kingsmead Way LSIS (no.131), and the previous appeal supported the principle of mixed use. While we accept that these developments may not come forward for some time, the allocation would appear to contradict the support of the Council for a mixed use scheme, and may potentially undermine the policy direction for this designation. The designations within the Olympic Park site are also not aligned with the Lower Lea Valley Opportunity Area Planning Framework, the emerging Legacy Masterplan Framework, the approved planning permissions for the Park and Games, the Waterspace Masterplan and the detailed planning permissions for the sites identified. The Hackney Wick SIL (136a) is to become the International

Broadcast Centre, likely to be used for office spaces in Legacy rather than industrial, and the adjacent Other Industrial Area is to be developed as a permanent Handball Arena leisure use. Some of the other proposed industrial designations in this area also do not appear to be up to date. This could appear to potentially compromise the successful regeneration of the Olympic Park site.

The Core Strategy's designations for the sites within the Olympic Park area and other open spaces proposed and existing alongside the waterways should promote leisure and recreation opportunities that utilise the water and exploit the maximum potential of their location (such as moorings, boating etc) to create an active waterside.

The indicated waterside sites should be linked to the waterways policies and waterfront SPD to ensure that their future development and use maximise the potential of their waterside locations.

We were disappointed that one particular site that would be capable of utilising the waterway for an industrial use – at the Millfields Waste Transfer site in Millfields Road (no.130) - was not made to utilise its waterside location for waterborne freight as part of its recent planning application, despite the use being ideal for this.

Estate Renewal

Would expect any redevelopments of these sites (Colville, Haggerston West) to fully maximise the potential of their waterside location, using the water as a starting point for their design to ensure full integration between the site and the water, and making the best use of this as an asset of these sites.

I hope that these representations are clear and concise and can be taken into account in the LDF preparation process. Should you wish to discuss any aspect of the representations, please do not hesitate to contact me or my colleague, Ian Runeckles - Planning Manager, at your earliest convenience.

Yours sincerely,



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