



Canal &
River Trust

02 March 2018

Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
By email only

Dear Mayor Khan

DRAFT NEW LONDON PLAN

The Canal & River Trust (the Trust) is the guardian of 2,000 miles of historic waterways across England and Wales, of which approximately 100 miles and 110 acres of docks are within our London Waterway. We are among the largest charities in the UK. Our vision is that “living waterways transform places and enrich lives”.

Our waterways, including the adjacent towpaths and dockside walkways, provide important areas for recreation, biodiversity, sustainable transport (with a related air quality benefit), business, tourism, a focal point for cultural activities and, increasingly, a space where Londoners are choosing to live. They can also provide a resource that can be used to heat and cool buildings, a corridor in which new utilities infrastructure can be installed and a way of sustainably draining surface water away from new developments. We believe that supportive policies and investment that lead to the development of thriving waterways and waterside places are part of a virtuous cycle that can increase wellbeing by improving physical and mental health, bringing communities together and encouraging economic development. Thriving waterways can improve wellbeing in many of the same ways that the Mayor is hoping to achieve through the “Healthy Streets” initiative set out in his draft Transport Strategy.

The Trust has recently responded to the Mayor’s A City for All Londoners (Appendix A) document, his Draft Mayor’s Transport Strategy (Appendix B) and his Draft Environment Strategy (Appendix C). In this response, we have focused on the specific changes that we believe are required to planning policies of the London Plan. Where relevant, we ask that our comments on A City for All Londoners, the Draft Transport Strategy and the Draft Environment Strategy are taken into account alongside this consultation response. We consider that the Trust’s waterways and our work as a charity, can support the Mayor’s aim of building a city that works for all Londoners – where everyone has the opportunity to reach their potential, lead fulfilling lives and build tight bonds with

Canal & River Trust The Toll House Delamere Terrace Little Venice London W2 6ND

T 0303 040 4040 **E** canalrivertrust.org.uk/contact-us

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people from many different backgrounds within their communities. We consider that there are many priority areas for the Mayor where there are synergies with the Trust's vision and aims.

The potential contribution that our waterways can make to social, economic, environmental and cultural wellbeing in London, with the right policy support, is significant, with:

- An ethnically diverse population (50% BAME) of over 1.2 million Londoners living within 1km of one of our waterways (15% of the capital city's population);
- In 14 of the 15 boroughs that benefit from our waterways the percentage of the population identified as being deprived in any dimension is greater than or equal to the borough average, thus investment in our waterways has the potential to address wellbeing inequalities;
- Our waterways and docks are within or adjacent to many of the London Plan's Opportunity Areas and the Mayor's Housing Zones, including: Old Oak and Park Royal; Upper Lea Valley, including Tottenham Hale and Meridian Water; Lower Lea Valley, including the Olympic Park and Poplar Riverside; Docklands; Southall Gasworks; Kings Cross; Paddington; Alperton; Hayes. As planned, these sites alone amount to approximately 125,000 new homes and 250,000 jobs, with Old Oak Park Royal and Meridian Water alone including plans for circa 40,000 new homes and 75,000 jobs.

The Trust has recently published [Waterways & Wellbeing](#), which starts to present evidence on the link between access to waterways and the benefits for social, environmental and economic wellbeing and sets out the Trust's intentions to develop this evidence base further. *Waterways & Wellbeing* cites a recently published study in the Royal Society Open Science (July 2017) *Using Deep Learning to Quantify the Beauty of Outdoor Places* written by researchers at the University of Warwick and The Alan Turing Institute. It highlighted the importance of waterways in increasing the scenic value of outdoor spaces, especially those in urban areas. The 'canal natural' feature was found to be the strongest positive predictor of scenic quality and 'rivers' were ranked eighth in 'urban built-up', emphasising the important contribution that they can and do make to place-making.

The Trust has begun collecting data on who is using our canal towpaths as part of the approach set out in *Waterways & Wellbeing*. This shows that our waterways are providing a wide range of functions. For example, respondents to our survey at Tottenham Hale in July 2017 suggested that 35% of towpath users were using the towpath as a commuting route, with the percentage of respondents using it for one of the following other reasons all being equal to or greater than 10%:

- Health / Exercise
- Relaxation
- Nature / Wildlife / Environment
- Time with family / friends
- Dog walking
- Fresh air / pleasant weather.

Use of towpaths for commuting is helping to take people off the roads and helping to reduce the demand on public transport. In the same survey, if respondents hadn't have been using the

towpath to complete a journey, the most frequently chosen alternatives that they said they would have been using were in a car/van (25%), on the bus (25%) or on a train (18%).

We also have evidence on the growth in the number of boats on our waterways in London and the characteristics of the people that are on them. This suggests that approximately 50% of boats on our waterways in London are now used as permanent homes. 50% of boaters responding to the relevant question in our 'Who's on London's Boats' survey also said that affordability / financial reasons were one of their main motivations for living on a boat. We are developing a [London Mooring Strategy](#), with the aims:

- For better provision and management of a range of facilities and mooring types in London
- To manage the high number of boats in London and to mitigate the environmental impacts on the waterways and neighbours
- To help ensure fair sharing of water space
- To enable a wider range of boaters to visit and navigate in London
- To protect existing, and generate additional, income to maintain the waterways in London
- To support a London waterway destination and tourism strategy
- To ensure the mooring strategy contributes to the Trust's aim that London's waterways help to transform neighbourhoods and enrich people's lives.

The Trust is disappointed that the concept of the Blue Ribbon Network has been dropped in the draft London Plan. Whilst the visionary and widely applauded nature of the original concept was undermined in the previous administration's London Plan, it remained a helpful means of differentiating between the challenges and opportunities that the waterways provide in London and other forms of Green Infrastructure. Nevertheless, we welcome the fact that there are specific waterway policies in the plan. We also welcome the fact that changes have been made to these to respond to challenges relevant to waterways other than the tidal Thames. However, we suggest that further changes should be made to ensure that planning strategies and decisions in London fully recognise the multi-functional benefits offered by the waterways. Such an approach should form part of an effective, and therefore sound, strategy for the development of London, given the scale of development proposed alongside waterways, including those owned and managed by the Trust. We believe that this will help the London Plan to achieve the good growth that it aspires to and contribute to the delivery of the National Park City. We also believe that this will enable London to lead the way in demonstrating how blue infrastructure should contribute to a wide range of sustainable development objectives.

The Trust is keen to see our waterways make a positive contribution to regeneration and place-making, either through the actions of third parties, which we try to influence as a statutory consultee in the development management process or through local plans, and through the work of the Trust as a developer, including, through our joint venture partnerships, which will continue to deliver new homes and regenerated neighbourhoods. Amongst other things, we consider that there is a tension between policies SI16 and SI17 of the Plan, which result in a lack of clarity for decision makers, contrary to the requirements of the NPPF. Whilst policy SI16 seems to encourage activity on London's waterways, including through the provision of moorings in appropriate locations, policy SI17 strikes a more protectionist tone, including the requirement to protect the, poorly defined, 'open character' of waterways. We argue in our comments below that,

as such, SI17 may be used to prevent some of the forms of development that SI16 and the supporting text to these policies (such as 9.17.2) support.

The Trust suggests below that a number of amendments are required to ensure that the London Plan is sound, achieves the best sustainable development outcomes possible and provides clarity for decision makers, applicants and consultees.

We would be happy to meet with the Mayor's advisors to discuss these comments and the opportunities raised in our previous responses to his strategies. We look forward to commenting further on any amendments to the London Plan and taking part in the Examination in Public, as necessary.

Yours sincerely

Steve Craddock MRTPI
Planning Manager – London, South & South Wales
Canal & River Trust

Good Growth Policies

Policy GG1 – Building strong and inclusive communities (Suggested Amendment)

Policy GG1 aims to

“ensure that streets and public spaces are planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging and community ownership, and where communities can develop and flourish”.

The Trust supports this ambition and wants to see new development assist in the achievement of it. However, we note that there is no definition of public space within the London Plan. To avoid any suggestion that this section of policy GG1 only applies to publicly-owned space, we suggest the policy should instead refer to ‘streets and public realm’, in the interests of the internal consistency of the plan, as this term is defined in para 3.71. We welcome the recognition of waterways within this definition. We return to this issue in our response to SI16.

Policy GG2 - Making the best use of land

Policy GG2 states that those involved in planning and development must ‘understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London’s distinct and varied character’.

The Trust welcomes this policy requirement. We suggest that a number of the amendments that we have proposed below will help to ensure that waterways are considered as part of this.

Policy GG3 – Creating a Healthy City (Suggested Amendment)

The Trust welcomes the recognition of the role that waterways can play in improving health (para 1.3.3). However, it is unclear whether this is carried forward into policy GG3 because of the lack of clarity about the scope of the Healthy Streets initiative and the definition of Green Infrastructure used in the plan.

Policy GG3 embeds the Healthy Streets approach into this strategic policy. Whilst we support the overarching intentions of the Healthy Streets approach, the Trust considers that by focusing exclusively on streets (as appears to be the intention in policy T2 and its supporting text), opportunities will be lost to create attractive, mixed use, sustainable travel routes that use off-road spaces such as waterway towpaths and parks, for example. We have commented in detail on the Healthy Streets approach in response to the Draft Mayor’s Transport Strategy and we return to this issue below.

Policy GG3 does also require that those involved in planning and development ‘plan for improved access to green space and the provision of green infrastructure’. However, the definition of ‘green infrastructure’ in the plan does not include waterways. We suggest amendments below to address this.

We agree that access to waterways varies across the city (para 1.3.3). This is not simply due to variations in distance but is also impacted by variations in quality of access. The quality of their environments also varies. Policy SI16 recognises the case for improvements to waterway access and towpaths / riverside paths. To ensure consistency between it and this cross-cutting policy, we suggest that point E of GG3 is redrafted to state:

“Plan for ~~improved~~ improvements to access to, and the quality of, green and blue spaces and the provision of new green and blue infrastructure”.

Spatial Development Patterns Policies

Policy SD1 – Opportunity Areas (Suggested amendment)

Policy SD1 states that the Mayor will ‘ensure that Opportunity Areas contribute to regeneration objectives by tackling spatial inequalities and environmental, economic and social barriers’. Canal & River Trust waterways are within or adjacent to many of the London Plan’s Opportunity Areas and Mayor’s Housing Zones. In the interests of their sustainable development and the wellbeing of their communities, we consider that these regeneration areas should build upon the benefits offered by the waterways. As such, we suggest that policy SD1 should be amended to state:

“...contribute to regeneration objectives by tackling spatial inequalities ~~and~~, environmental, economic and social barriers and maximising the benefits of existing strategic environmental, historic and cultural assets, such as waterways”.

Para 2.1.30 recognises how the Lee Valley area is ideally located for freight and logistics. The River Lee Navigation between Bow Creek and the M25 is classified as a commercial waterway, where there may be some freight potential, subject to market and policy drivers. In particular, we consider that it may have a role to play in moving construction materials and demolition waste associated with new waterside developments and new strategic infrastructure (Crossrail 2). Where relevant, we suggest that the text on Opportunity Areas in this section should recognise strategic environmental, historic and cultural assets, such as waterways.

Policy SD10 - Strategic and local regeneration (Suggested amendment)

The Trust supports the policy requirement that:

“Development Plans, Opportunity Area Planning Frameworks and development proposals should contribute to regeneration by tackling spatial inequalities and the environmental, economic and social barriers that affect the lives of people in the area, especially in Strategic and Local Areas for Regeneration.

However, regeneration areas often contain environmental, cultural and historic assets that can support wellbeing, regeneration and help to develop a sense of place. In the interests of their sustainable development and the wellbeing of their communities, we suggest that an additional point should be added to policy SD10 to require that boroughs:

“D. Develop plans for strategic and local regeneration areas that maximise the benefits of their existing natural, cultural and historic assets”.

This proposed amendment is consistent with paragraph 2.10.6. However, the Trust considers that this point warrants an inclusion in policy.

The Trust’s waterways in London flow through some of the most deprived parts of the city, as is evident from figure 2.19. In 14 of the 15 boroughs that benefit from our waterways the percentage of the population identified as being deprived in any dimension is greater than or equal to the borough average. The Trust is keen to see our waterways make a positive contribution to

regeneration and place-making, either through the actions of third parties, which we try to influence as a statutory consultee in the development management process or through local plans, and through the work of the Trust as a developer, including, through our joint venture partnerships, which will continue to deliver new homes and regenerated neighbourhoods. We welcome the Mayor's recognition that partnership working is essential to delivering regeneration (2.10.3) and we are ready to play our part in partnerships that relate to the regeneration of areas on and around our waterways.

Design Policies

Policy D1 - London's form and characteristics (Suggested amendment)

The Trust welcomes much of policy D1, in particular the focus on connectivity, inclusivity, safety and security, active frontages, social interaction and heritage assets.

We also welcome the need for the form and layout of a place to 'help prevent or mitigate the impacts of noise and poor air quality'. The Trust is concerned that development alongside our waterways can create canyons that substantially limit the number of hours where daylight reaches the water space. One of the adverse impacts of this is that it limits the opportunity for boaters to use solar panels for electricity and heat generation and can increase the amount of time that they are reliant on sources of energy that lead to locally unwelcome emissions. We return to this issue in our response to policy D8.

We welcome the intention of part (B)(6) of policy D1 and suggest that, where relevant, its implementation should relate to comfortable and inviting environments for waterspace users where these are affected by development by, for example, wind or reductions in light. However, we question whether the requirement to 'achieve comfortable and inviting environments... outside buildings' is sufficiently clear. In the interests of providing clarity for decision makers, we suggest instead that the policy should state:

“achieve comfortable and inviting environments both inside ~~and outside~~ buildings and in the public realm affected by the development”.

Policy D2 – Delivering good design

The Trust welcomes the proposal that waterbodies should be considered in the initial evaluation of an area's capacity for growth.

Policy D7 – Public realm (Suggested Amendment)

Paragraph 3.7.1 explains that waterways are considered as part of the public realm. We welcome much of policy D7. Through its implementation, new development and investment can help to deliver improved waterway environments that are safe, accessible, inclusive, attractive, well-connected, relate to local and historic context and incorporate the highest quality design, which, amongst other things, point A requires.

We also welcome the recognition that the public realm can encourage active travel. In terms of waterways and their towpaths, their full potential for improved connectivity needs to be realised through treating them as a strategic resource rather than just a collection of connected public realm spaces. This is why we continue to believe that improving blue and green infrastructure should be as much a part of the Healthy Streets agenda as improving traditional streets. We return to this issue in our response to the 'Transport' chapter.

We particularly welcome point E, which seeks to

“Ensure there is a mutually supportive relationship between the space, surrounding buildings and their uses, so that the public realm enhances the amenity and function of buildings and the design of buildings contributes to a vibrant public realm”.

Where the Trust’s waterways are concerned, we strongly believe that developments and uses on land and water should be mutually supportive. The relationship between them is vital to create great waterway places and we suggest that the water should be the starting point for design strategies for developments close to waterways. This is consistent with the advice set out in the Town & Country Planning Association and British Waterways’ Policy Advice Note on Inland Waterways. However, we question whether policy SI17 is inconsistent with this aim. We suggest below that changes to that policy are required.

Part F of policy D7 states that ‘consideration should also be given to the local microclimate created by buildings, and the impact of service entrances and facades on the public realm’. Whilst we welcome the recognition of the need to consider the local microclimate, we suggest that this does not provide a clear indication of how a decision maker should react to a development proposal once the issue has been considered and, as such, is not consistent with para 154 of the NPPF. We suggest that many of the tests included in policy D8 (C) that relate to the functional and environmental impact of tall buildings should be equally applicable to all developments that may have a significant impact on the public realm and should be included in policy D7.

Policy D8 – Tall buildings (Suggested Amendment)

We suggest that the policy considerations for immediate views in (C)(1)(a)(i) of policy D8 are equally applicable to the wider public realm as they are to streets. This should include waterways (as per the definition in para 3.7.1).

i) Immediate views from the surrounding streets and public realm – attention should be paid to the base of the building. It should have a direct relationship with the street and public realm, maintaining their pedestrian scale, character and vitality ~~of the street~~. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.

We question why the River Thames is singled out for special consideration in policy (C)(1)(f). The Trust’s waterways in London are equally, if not more so given their relative width, susceptible to the creation of a canyon effect as a result of the development of tall buildings. As with the River Thames this can have an adverse impact on views from the water and waterside spaces. It can have an adverse impact on levels of light reaching the waterway corridor, which can impact on its biodiversity value and its attractiveness as a space for recreation and sustainable travel. In the absence of an evidence-based justification for this section of the policy focusing solely on the Thames, to ensure that the London Plan has proper regard to the need for good design alongside all waterways (consistent with para 57 of the NPPF), we suggest that this section of the policy is amended as follows:

f) Buildings near waterways ~~the River Thames, particularly in the Thames Policy Area,~~ should not contribute to a canyon effect along the waterway ~~river~~ which encloses its ~~the~~

open aspect of ~~the river~~ and the waterside ~~riverside~~ public realm, or adversely affect strategic or local views ~~along the river~~.

We suggest that (C)(2)(g) should seek to avoid a significant detrimental effect on all solar energy generation rather than just that on adjoining buildings. The Mayor has previously suggested to the Secretary of State for Environment, Food & Rural Affairs that there is a need to do more to tackle NOx and particulate matter emissions from boats in London. One of the ways that many boaters try to live more environmentally-friendly lives is by installing solar panels on their boats. The effectiveness of these can be severely limited by tall buildings alongside waterways that have a significant adverse impact on the level of daylight reaching the waterway. We welcome recognition of the need for tall buildings to ensure that they do not interfere with navigation. To ensure that the London Plan responds to the environmental issues identified by the Mayor, we suggest that the policy is amended as follows:

g) Buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation ~~on adjoining buildings~~.

We welcome point (C)(3)(a) of policy D8.

Housing Policies

Policy H2 – Small Sites (Objection)

The Trust has no objection to the Mayor's aim of growing the role that small sites have in housing delivery in London. However, we suggest that part D of policy H2 will be seen as an attempt to undermine the standard practice that development plan policies are intended to be considered 'in the round' by applying a presumption in favour of development that gives undue primacy to one policy. Point E of H2 states that, prior to the preparation of design codes, this presumption applies where a development would not give rise to an unacceptable level of harm to residential privacy, designated heritage assets, biodiversity or a safeguarded land use that outweighs the benefits of additional housing provision. There are a wide range of other considerations that need to be taken into account when determining whether a new small site development constitutes the sustainable development that the London Plan has an obligation to seek to achieve. If the presumption were to be applied without the benefit of reference to other policies in the development plan then a decision maker would, for example, be able to exercise no control over the design quality of a development, its flood risk or its energy efficiency, for example. We suggest that this is patently an unsound approach, that is not consistent with national planning policy and is not justified.

The Trust would also be concerned that the policy would reduce the importance of considering the structural integrity and stability of its waterways, which is an important planning consideration in para 109 of the NPPF and potentially significant health and safety issue. In certain areas of London, large pounds of water are held in place by infrastructure that would be very sensitive to inappropriate development adjacent to it.

Policy H16 – Gypsy and Traveller Accommodation (Suggested Amendment)

The Trust has previously provided the Mayor with information on the rapid growth in the number of boats on our waterways in London and these figures are presented (rounded) in the waterways section of the 'Sustainable Infrastructure' chapter of the Plan. Our [Draft London Mooring Strategy](#) provides more information on the growth experienced. The London Assembly Environment Committee also considered this issue in its 2013 report 'Moor or Less'. Evidence collected by the Trust, from two separate recent surveys ([Who's on London's Boats](#) and the [Boat Owners' Survey](#)), suggests that approximately 50% of boats on our waterways in London are now used as permanent homes. 50% of boaters responding to the relevant question in our 'Who's on London's Boats' survey also said that affordability / financial reasons were one of their main motivations for living on a boat. That this growth has occurred at a time when bricks and mortar housing has become less affordable and at a time of welfare changes may indicate that it is in part due to the problems in London's housing market that the Plan is seeking to resolve.

The Housing & Planning Act (section 124) introduced a requirement for housing authorities to "consider the needs of people residing in or resorting to their district with respect to the provision of places on inland waterways where houseboats can be moored". Whilst this statutory requirement sits with local authorities, many boaters in London move around regularly, meaning that a proper assessment of needs would need to be carried out at regional or sub-regional levels to have any chance of properly considering the issue. We suggest that policy H16 should be renamed so that it relates to people living in caravans and boats, consistent with the Housing and Planning Act, and it

should include a requirement for local planning authorities to work together to consider the needs of people living on boats in London and put in place strategies for how these needs will be met. We suggest that the following wording is added:

G Boroughs should cooperate to consider the housing needs of people residing in or resorting to inland waterways in their areas and to prepare strategies to address issues identified.

We consider that such an approach would help to ensure that the plan better responds to the recommendations of the London Assembly Environment Committee's 'Moor or Less' report than simply relying on the qualified, and currently inconsistent, policy position provided by policies SI16 and SI17.

Social Infrastructure Policies

Policy S5 – Sports and Recreation Facilities (Suggested Amendment)

A substantial length of the existing Walk London network is formed of some of the Trust's towpaths. We suggest that policy S5(A)(3) should also encourage the improvement of the Walk London Network. To ensure that this policy supports aims set out elsewhere in the plan (SI16), we suggest that this point of the policy is redrafted to state:

'maintain and promote, and where necessary improve, the Walk London Network shown on Figure 5.1 and encourage networks for walking, cycling and other activities'.

Heritage and Culture Policies

The Trust's waterways provide an important cultural resource for London in themselves, as 200 year old working heritage and an inclusive and free space for citizens and visitors to enjoy. They also provide a stage and a setting for more distinct cultural activities, such as public art, theatre, poetry and film. We are keen to work with the Mayor to capitalise on the cultural opportunities that the waterways provide.

Policy HC1 – Heritage conservation and growth (Suggested Amendment)

The Trust broadly welcomes policy HC1, including the proposal that regeneration should be driven by a clear vision that recognises and embeds the role of heritage in place-making.

Para 7.1.2 states that 'non-designated assets cover an even wider range of features including buildings of local interest, most archaeological remains, canals, docks and waterways, historic hedgerows and ancient woodlands'. Whilst we welcome the recognition that canals, docks and waterways are at the very least non-designated heritage assets, it should be recognised that these are also commonly appropriate subjects for the designation of Conservation Areas or Listed Building status, including some Grade I listings. We suggest that para 7.1.2 is redrafted as follows:

'Non-designated assets cover an even wider range of features including buildings of local interest, most archaeological remains, canals, docks and waterways, historic hedgerows and ancient woodlands, where these are not already the subject of formal designations'

London's network of waterways is the culmination of two millennia of cumulative manipulation of the natural configuration and character of the Thames and its tributaries, augmented by the development of navigations and the construction of canals and docks. As a primordial element of the complex web of inter-connecting transport routes, waterways have fundamentally helped to shape the historic grain.

Waterways are a spatial entity that transcends the boundaries between boroughs/cities, yet planning designations that acknowledge and protect their historic integrity as continuous, linked corridors, often exhibiting a coherent vernacular, are limited. The London Plan therefore has an important role to play in overcoming this fragmented picture, by providing a strategic overview of waterways as a layer of urban history and development, that deserves a consistent conservation approach.

We suggest that this should be reflected in para 7.1.6.

Historically, London has demonstrated an ability to regenerate itself, which has added to the city's distinctiveness and diversity of interconnected places. Today urban renewal in London offers opportunities for the creative re-use of heritage assets and the historic environment as well as the enhancement, repair and beneficial re-use of heritage assets that are on the At Risk Register. In some areas, this might be achieved by reflecting existing or original street patterns and blocks; in others, it will be expressed by retaining and reusing buildings, spaces and features that play an important role in the local character of an area. In addition, opportunities should be taken sensitively to re-activate and enhance historic waterside places, based on a sound understanding of the heritage of the waterway network and acknowledging the key role that it historically played in shaping urban

development. Figure 7.4 illustrates the broad characteristics of London as derived from its historical development, which can be used to inform evidence bases for area-based strategies.

In the key of Figure 9.6, '6. Regents Canal' should be "6. Regent's Canal"

Green Infrastructure Policies

Policy G1 – Green Infrastructure (Suggested Amendment)

The Trust welcomes the fact that waterways have their own policies within the London Plan. However, we suggest that it should be made clear that, where relevant, they should be considered as green infrastructure in para 8.1.1. By doing so, boroughs would be encouraged to see waterways as features of an integrated green infrastructure network in policy G1, which we suggest is appropriate and necessary for the proper planning of London's green infrastructure. Waterways would also need to be part of the strategies that boroughs are to produce under G1 (B) and G1 (C). At present, waterways are not included within the definition of green infrastructure in the London Plan and they are rarely mentioned within chapter 8, with one of the few references referring to the open spaces and towpaths alongside them.

Waterways can (and do) contribute the same types of benefits as other forms of green infrastructure, as *Waterways and Wellbeing* demonstrates. For example, many of the Trust's waterways in London are Sites of Importance for Nature Conservation. The benefits of water are recognised in the Urban Greening Factors (in table 8.2) and we welcome the encouragement that this policy will provide for the creation of new waterspaces. We suggest that this should be considered as a strategic opportunity in new major regeneration schemes, such as the development of Opportunity Areas. We have made the case for waterways to be considered in strategies for these developments elsewhere in this response.

The Trust does not consider that its waterways in London should be designated as Metropolitan Open Land. Our justification for this is set out below in response to policy SI14.

Sustainable Infrastructure Policies

Policy SI1 - Improving air quality

The Trust supports the key aim that the Mayor has set out in his Draft Environment Strategy of reducing the exposure of Londoners to harmful pollution. We commented in our response to that strategy (appendix C) on how we consider the Trust's waterways in London help to support low emission living and set out our concerns about the Mayor's proposals for new regulation related to waterway emissions.

We have no specific comments to raise on policy SI1 but would draw the Mayor's attention to comments that we have made in relation to waterway canyons (policies D7 and D8) and the provision of on-shore power connections to residential moorings (policy SI17)

SI2 – Minimising Greenhouse Gas Emissions

The Trust welcomes policy SI2, particularly the requirement to exploit local energy resources as point 2 of the energy hierarchy. The policy identifies secondary heat as a local energy resource and, in turn, secondary heat is defined as including heat that exists naturally within the environment, including water.

We have commented at length on the potential for our waterways to provide thermal energy as part of heating and cooling networks in our response to the London Environment Strategy (appendix C). We would welcome further discussions with the Mayor's advisors on this matter.

SI3 - Energy infrastructure (Suggested Amendment)

The Trust welcomes the requirement for energy masterplans to be prepared for 'large scale development locations' and the recognition of the need to consider secondary heat sources, including thermal energy in water. It is unclear, however, whether this requirement falls to developers at planning application stage or local planning authorities preparing local plans. Without further clarity provided in the policy, we suggest that there is a risk that this requirement will go unmet. The Trust also suggests that the plan should recognise the need for energy masterplans to feed into overall site masterplans so that space for energy centres can be planned into large scale developments, helping to meet the need identified in para 9.3.11.

Policy SI5 – Water Infrastructure

Paragraphs 9.5.4 and 9.5.5 refer to the preparation of Thames Water's Water Resource Management Plan and how the Mayor is 'reviewing the available information on each of the supply options alongside evidence of their impacts on Londoners and Mayoral priorities'. The options being considered by Thames Water include strategic water transfers using the Canal & River Trust's waterways. Should the Mayor or his advisors wish to discuss these options further then we would be happy to do so.

As explained in our response to the Draft Environment Strategy, the Trust considers that there is the opportunity for its network to play a greater role in helping to meet local water needs, particularly needs that can be met through the use of grey water. We consider that the ability to offer both a supply and discharge solution, with appropriate controls on water quality, means that our waterways provide an opportunity for a lifecycle water delivery and treatment model that

maintains a steady state of water quality and flow, through the use of dual piped systems for new sites, the use of water treatment and attenuation. Whilst policy SI5 does not explicitly support the consideration of opportunities to use local water supplies, we consider that this would be consistent with (C)(1), which requires development proposals to minimise the use of mains water. As such we have no specific comments to make about the soundness of policy SI5.

Policy SI6 - Digital connectivity infrastructure

The Trust's waterways already provide a corridor for digital connectivity infrastructure and there are likely to be new opportunities for this during the course of the London Plan period. We welcome the proposal for effective use to be made of the public realm (which includes the Trust's waterways) to accommodate well-designed and located mobile digital infrastructure.

SI13 – Sustainable Drainage (Suggested Amendment)

In many circumstances and subject to the Trust's agreement, surface water can be (and is) sustainably drained from developments into our waterways, thus reducing the pressure on mains drainage infrastructure and helping to manage flood risk. We are supportive of this in principle, subject to water quality, discharge rates and the consideration of works needed to our infrastructure to allow water to be discharged. Particularly in the case of major regeneration areas and at the city-wide scale, we consider that our waterways should be seen as part of the strategic sustainable urban drainage and flood risk management network. The Trust welcomes the recognition of the potential for rainwater discharge direct to a watercourse in the drainage hierarchy.

We suggest that in point D, consideration of water quality should not be limited to rivers. It is an important issue to be considered when assessing a proposal to discharge water to one of the Trust's canals in London. In the interests of London's sustainable development, we suggest that the policy should be amended as follows:

D Drainage should be designed and implemented in ways that address issues of water use efficiency, ~~river~~ water quality, biodiversity, amenity and recreation.

The Trust's concerns about water quality related to surface water discharge in London often stem from concerns about contamination of development sites. We are surprised that the London Plan does not contain a policy on land contamination.

Policy SI14 Waterways – strategic role (Objection)

The Trust is disappointed that the concept of the Blue Ribbon Network has been dropped in the draft London Plan. Whilst the visionary and widely applauded nature of the original concept was undermined in the previous administration's London Plan, it remained a helpful means of differentiating the challenges and opportunities that the waterways provide in London. We believe that a world class city should have world class waterways and should aim to lead the world in how they are used to deliver a wide range of sustainable development outcomes, including development in and on them.

There is some uncertainty as to whether the green infrastructure policies of the plan apply to waterways. They are not included within the definition of green infrastructure in the plan but para

9.14.2 recognises that waterways do provide green infrastructure. As suggested above, we consider that para 8.1.1 should be amended to include a reference to waterways.

Given the number of boroughs that our waterways flow through, the number of people that live in close proximity to them, their importance to the character of some of London's iconic places, the levels of deprivation that exist and the scale of regeneration planned alongside them, the Trust considers that the requirement for boroughs to designate and develop strategies for Thames Policy Areas should be widened to 'Strategic Waterway Policy Areas'. The Trust's waterways should benefit from the same approach to cross-boundary working by boroughs. This could support strategic ambitions to improve them as walking and cycling routes, plan and deliver waterborne freight opportunities on a sub-regional basis, meet the requirements of the Housing & Planning Act and develop cross-boundary strategies to capitalise on their potential to support heating and cooling networks, for example. We consider that the statutory obligation that the Mayor has in relation to the Thames is no justification for this part of the London Plan focusing exclusively on it when it is clear that other waterways are of strategic importance.

Furthermore, these strategies should not just support development plans but should also support the preparation of infrastructure plans used in the preparation of CIL Charging Schedules and guiding its expenditure. It should not fall to the Canal & River Trust to fund improvements to the quality of canal towpaths and environments or their management that are expected as a result of new development.

Proposed policy amendment:

To reflect the distinctiveness of areas that specifically relate to ~~the River Thames~~ London's waterways, relevant Development Plans should designate, and ensure the maintenance of, ~~Thames~~ Strategic Waterway Policy Areas. Boroughs are encouraged to work together on policies and to develop and update joint Waterway ~~Thames~~ Strategies that should support individual Development Plans and infrastructure plans.

We support much of paragraph 9.14.2. However, we suggest that it fails to recognise a number of the roles that waterways are playing in London, such as:

- Living on waterways has become an increasingly popular choice in London at a time when bricks and mortar housing has become less affordable and at a time of welfare changes.
- Waterways are providing the thermal energy for cooling buildings and have the potential to support heating and cooling networks.
- Waterways provide an important sense of place (as evidence presented in [Waterways & Wellbeing](#) demonstrates) and are an important focal point for existing and planned major regeneration schemes.
- Many waterways are important heritage assets in their own right, not just backdrops to them.

The Trust and the Environment Agency are members of the Thames and London Waterways Forum steering group. As important navigation authorities (and in the Trust's case a major waterway landowner) in London, we believe that this should be recognised in paragraph 9.14.3.

The Trust is preparing a Prospectus for its waterways in London, which we will be launching shortly, and we suggest that this should also be recognised in paragraph 9.14.3 when the next iteration of the London Plan is published.

We question why the River Thames should be singled out as the only waterway that should not be designated as Metropolitan Open Land (MOL) on the basis that it may restrict functional uses of the river. This same logic should apply to the Trust's waterways, especially the River Lee Navigation, which is defined as a commercial waterway in extant legislation (the Transport Act 1968 as amended). The application of the MOL policies, which results in Green Belt controls on development, means that changes of use of waterspace or development of certain infrastructure in, on or alongside a waterway designated as MOL would be inconsistent with the development plan unless the applicant could demonstrate very special circumstances. This includes facilities for outdoor sport and recreation unless these are able to preserve openness. The Trust does not consider that this is a justified strategy that takes account of the functional uses of the Trust's waterways. We suggest that the London Plan should state:

~~The River Thames~~ Navigable waterways should not be designated as Metropolitan Open Land, as this may restrict their use for ~~transport~~ functional waterway infrastructure and related uses.

Figure 9.6 (Suggested Amendment)

As important navigable stretches of waterway flowing through areas of planned major regeneration, we suggest that the Limehouse Cut, Hertford Union Canal and Bow Back Rivers should be added to this map. We also ask that it is corrected to remove the 'break' in the Regent's Canal between its junctions with the Limehouse Cut and Hertford Union. The canal is fully navigable between these points.

Policy SI15 - Waterway transport (Suggested Amendment)

We support the requirement for development proposals close to navigable waterways to maximise water transport for bulk materials during demolition and construction phases in part I of the policy. This is carried through from the existing London Plan. However, our experience is that the policy rarely leads to the use of waterways for the transportation of demolition and construction materials. We question whether the plan could go further by requiring developments adjacent to navigable waterways above a certain threshold (those referable to the Mayor, for example) to submit a feasibility assessment that considers the opportunity to use waterborne freight in this way as part of their transport assessments. Having this information at the time an application is determined (and s106 agreed) would allow the decision maker to balance the benefits against any impacts on development viability.

Policy SI16 Waterways – Use and enjoyment

We support much of policy SI16, which we believe is largely consistent with the Trust's aspirations for its waterways in London to be active and vibrant places. However, we have the following concerns that we suggest should be addressed in order to ensure the soundness of the policy:

Point A:

We question why policy SI16 (A) supports water-dependent uses, whilst policy SI17 and the supporting text to policy SI14 supports water-related uses. Neither of these terms are defined in the plan. Even if one term were to be used, we believe that the lack of definition of it will result in a lack of clarity for decision makers, contrary to the requirements of para 154 of the NPPF. The use of two very similar terms without any justification or explanation for how they are considered to differ compounds this lack of clarity.

We suggest that 'water-related' rather than 'water-dependent' uses should be supported by the London Plan, subject to the protections offered in the waterway policies and generally throughout the plan. We have suggested a definition of water-related uses in our response to policy SI17 below.

Point D:

We welcome the support for new moorings in offline locations and elsewhere where there is no impact on navigation. However, the policy at present could be read to only support mooring facilities rather than the actual mooring of boats, which in some circumstances also requires planning permission. In some places, it may be possible to provide new moorings along London's waterways without developing physical infrastructure. As such, we suggest the following amendment:

D New moorings and mooring facilities should be:

- 1) supported as part of development proposals, but should be off-line from main navigation routes, in basins or docks, unless there are no negative impacts on navigation
- 2) managed in a way that respects the character of the waterways.

The Trust would also expect that new moorings protect the environment of the waterway but we suggest that this is adequately covered elsewhere in the plan.

Point E:

We welcome the proposal that major development schemes adjacent to waterways should consider the provision of new moorings. However, in some cases there may be scope for minor developments to improve their interaction with the waterway by planning for moorings.

At present, policy SI16 fails to recognise the role that good design has in creating places that encourage use and enjoyment of the waterways. We suggest that this is inconsistent with the expectations of planning policy set out in para 114 of the NPPF, which requires local planning authorities to plan 'positively for the creation, protection, enhancement and management' of green infrastructure. We suggest that point E is amended as follows:

~~Major~~ Development schemes adjacent to waterways should consider the provision of new moorings and be of a high-quality design that encourages the use and enjoyment of the waterways.

Para 9.16.2 states that there has been a significant increase in the number of boats on London's waterways and quotes rounded figures that are taken from the Trust's Draft London Mooring Strategy. These figures are from boat counts taken on the Trust's waterways or waterspaces

attached to them and not, for example, the tidal or non-tidal Thames. Para 9.16.2 should be corrected accordingly.

Para 9.16.2 also states that ‘there is a deficit of residential, leisure, visitor and commercial moorings to meet the increase in demand’. Our Draft London Mooring Strategy states ‘it can be hard to find space at towpath moorings in the most popular areas while the supply of long-term moorings isn’t enough to meet demand’. However, ultimately it is for local authorities to assess the housing needs of people residing in or resorting to their district with respect to the provision of places on inland waterways where houseboats can be moored, under section 124 of the Housing & Planning Act. We would not suggest that the evidence gathered by the Trust as part of the preparation of the London Mooring Strategy meets this requirement.

Point H:

We welcome much of point H, which seeks to improve towpaths and their linkages to the transport network as new developments come forward. However, we would not want to see opportunities to do this lost because a decision maker interprets that the policy only applies to publicly-owned spaces, as a result of the final sentence. The vast majority of the towpaths alongside the Trust’s waterways are in our ownership (a charity) and are ‘permissive paths’ that the Trust allows members of the public to use. Occasionally we need to close towpaths to carry out maintenance work. If this sentence is considered necessary then we suggest that it says:

These paths will be generally publicly accessible and not private spaces.

We also suggest that towpaths are part of the transport network, as recognised by TfL in its work with us on the Grand Union Canal Quietway and in our towpath survey findings (see above). Therefore, the first sentence of point H should be amended as follows:

Development proposals should improve and expand the Thames Path and the towpaths and provide better linkages to the wider transport network.

Paragraph 9.16.3 should state ‘facilitating their enjoyment of the ~~river~~ waterways’ as it relates to the Thames Path and towpaths.

Loss of policy 7.25 (Proposed Amendment to Policy SI16)

We question the justification for the loss of the link between waterspaces and tourism, which was made in policy 7.25 of the existing London Plan. The Trust’s waterspaces provide an attraction for visitors, including pedestrians, cyclists, boaters (including those entering London on boats via the canal network and trip boat patrons) and customers of businesses for whom a connection to the waterways is a key part of their offer (such as pubs, cafes and restaurants). They provide a means of accessing attractions in close proximity to the waterways, for example London Zoo, Camden Market or the Museum of London Docklands. West India Quay South Dock provides a valuable functional facility as one of a limited number of locations in which to moor super yachts, tall ships, Royal Navy ships and visiting naval ships, amongst others, in inner London. These bring life to the docks and attract visitors to the area. The Trust is keen that this facility is protected as growth in the Isle of Dogs is delivered. We suggest that policy SI16 contains an additional point (l), which states:

I Development proposals should protect and enhance existing facilities and moorings that support the contribution of the waterways to culture and tourism.

Policy SI17 (Objection)

Point B:

We question what is meant by 'distinct open character' in part B of policy SI17. If openness is intended to mean that large expanses of water are clear of any moored boats or floating infrastructure, then many parts of the Trust's waterways in London do not meet this description. Significant lengths of these waterways are instead characterised by a strong sense of enclosure, with man-made engineering structures, buildings rising sheer out of the water and a concentration of boats. We suggest that aiming to protect such a definition of openness would be contrary to the heritage and current functional uses of waterways. It would be contrary to the best interests of towpath users, who benefit from the natural surveillance provided by active uses of the waterway. It would also be contrary to policy SI16 which seeks to support new uses of the water. The result is a policy position that is not justified because it does not represent the most appropriate strategy and one lacking in clarity for decision makers, meaning that it does not meet the requirements of paras 154 and 182 of the NPPF. We suggest that part B of policy SI17 should be amended as follows:

B Development proposals should support and improve the protection of the ~~distinct open~~ character and heritage of waterways.

Point C:

A wide range of uses take place on London's waterways and have historically done so, including passenger and freight transport, recreation, residential uses, trip boats and floating shops, cafes, bars and restaurants. The mix of uses makes an important contribution to the character and vibrancy of London's waterways. It also helps to create places that are used 24 hours a day, bringing better passive surveillance to the waterways and their towpaths / riverside paths. As a result, we suggest that an appropriate definition of 'water related uses' should be 'uses that take place on boats capable of navigation or infrastructure that supports such uses'. Sufficient controls on such uses exist elsewhere in the waterway policies and throughout the plan, such as the protection of navigation in policy SI16 and character and environment in policy SI17.

Notwithstanding our previous comments that bars and restaurants should be considered water related uses where they take place on boats capable of navigation, we welcome the support for proposals that enhance the diversity, vibrancy and regeneration of waterways, particularly basins and docks, in paragraph 9.17.2. We also welcome the aim of protecting and promoting the vitality, attractiveness and historical interest of London's remaining dock areas. Currently, we consider that the chronic lack of activity in sections of the West India and Millwall Dock systems does nothing to evoke their history as places alive with uses on land and water. It also does not come close to delivering the potential that the docks have to support the sustainable development of the area. We suggest that a city like London, whose heritage is so closely linked to its waterways, should be aiming to be a world leader in how blue infrastructure contributes to a wide range of sustainable development objectives.

The support for schemes that enhance the vibrancy and vitality of waterways, particularly docks and basins, is the subject of two of the four supporting paragraphs to policy SI17 and yet it is not reflected at all in the policy itself. We suggest the policy, therefore, is not justified because it does not reflect the most appropriate strategy, which is detailed in the supporting text. We suggest that part C of policy SI17 should be redrafted as follows:

C Development proposals into the waterways, including permanently moored vessels and development into the waterways, should generally only be supported for water-related uses, unless they support the diversity, vibrancy and regeneration of waterways, in particular basins or docks.

As suggested above, sufficient controls on such uses exist elsewhere in the waterway policies and throughout the plan, such as the protection of navigation in policy SI16 and character and environment in policy SI17. The fact that the vast majority of the Trust's waterways in London are in our ownership, with certain additional controls applied by Defra, offers further protection.

Point D:

We support much of point D of policy SI17. However, we suggest that the policy should also seek to protect the structural integrity and stability of the waterway corridor where new development occurs in or alongside them. The NPPF requires that the planning system prevents both new and existing development from contributing to or being put at unacceptable risk from land instability (para 109). In certain areas of London, large pounds of water are held in place by infrastructure that would be very sensitive to inappropriate development adjacent to it.

We also suggest that development plans should do more than identify opportunities for increasing local distinctiveness, as is currently required by point D. The scale of regeneration proposed along the Trust's waterways and the range of benefits that they can bring, we believe, warrants more detailed consideration in development plans. We suggest that the following would more fully meet the expectations of planning policy set out in para 114 of the NPPF, which requires local planning authorities to plan 'positively for the creation, protection, enhancement and management' of green infrastructure.

D Development proposals along London's canal network, docks, other rivers and water space (such as reservoirs, lakes and ponds) should respect their local character and environment, protect their structural integrity and stability and should contribute to their accessibility and active water-related uses. Development Plans should incorporate policies and identify opportunities to protect and enhance waterways as important environmental, social and economic resources, key parts of the local public realm, strategic sustainable transport routes, green/blue infrastructure and important contributors to ~~for increasing~~ local distinctiveness.

In addition, we suggest that the policy should be renamed as follows:

Protecting and enhancing London's waterways

And that the following paragraph is included as the first paragraph of supporting text to policy SI17:

London's waterways provide a strong sense of place and connection in their own right and to the places that have grown up around them. The amount of new development planned

alongside them, including in Opportunity Areas and Housing Zones, means that they have an important role to play in the place-making of new neighbourhoods across the city. High quality design, in accordance with the design and National Park City policies of the London Plan, particularly D7 Public Realm, and investment through CIL / planning obligations should be pursued to deliver highly-liveable, inclusive and well connected waterway places. Planning for new on-water uses in appropriate locations will help to ensure that active, world-class waterways deliver new opportunities for living, working and socialising, increasing choice and inclusivity and supporting economic growth. Development plans should also seek to maximise the role that waterways can play in London's green future by regarding them as a local heat source (consistent with policy S13), a source of urban cooling, a source of potable and non-potable water (consistent with policy S15) and part of sustainable drainage networks (consistent with policy S113)

Point E:

Where the Trust is installing new residential moorings in London, we are providing an on-shore power connection. Many other types of moorings are frequently treated as not requiring planning permission and, as such, this section of policy S117 would not apply. We suggest that it is right that the policy only applies to residential moorings. However, the Trust wish to make it known that recent new permanent non-residential moorings installed by the Trust in London also benefit from shore power connections.

We have suggested in our response to the Draft London Environment Strategy (Appendix C) that, in the interests of fairness and consistent with the City for All Londoners vision, strategies to tackle domestic emissions from boats should be much more closely aligned with those for 'bricks and mortar' housing. This should include offering the same support and financial incentives as the Energy for Londoners programme and boiler scrappage schemes. As such, we welcome the statement in para 9.17.3 that appropriate measures and investment to minimise impact are being established.

The Trust is beginning discussions with the British Marine Federation about how we can work with boat and solid fuel stove manufacturers to ensure that a new generation of inland waterway boat engines and boat stoves incorporate improved environmental standards. We have suggested that the Government's proposed technology fund could be made available to the Trust and the marine sector to research and test innovations. We question whether point E of the policy is actually required, given that all development would be required to meet an air quality neutral standard under policy S11. However, if it is deemed necessary then we suggest that point E should provide greater flexibility to allow for a situation in which low-emission energy generation on boats or mooring infrastructure negates the need for on-shore power, which may ultimately be provided by less sustainable sources. In addition, we are not clear what the reference to 'water transport facilities' adds to the policy. We suggest that the following would represent a more appropriate strategy:

E On-shore power at ~~water transport facilities~~ should be provided at wharves and residential moorings to help reduce air pollution, unless they are to be used by boats able to meet their energy needs from low-emission technology.

Definition of Water Space

The London Plan does not include a definition of waterways, which is the term most commonly used in policies SI4 to SI17. However, it does include a definition of water space:

Area covered by water (permanently or intermittently), not adjacent land that is normally dry, and including the River Thames, other rivers and canals, and reservoirs, lakes and ponds.

We suggest that this definition fails to realise that for London's canal network the water space and its towpath are intrinsically linked and that this relationship is essential to the waterways' functions, heritage and character.

We would be concerned if this definition were to be applied to 'waterways', as it would negate the need for new development proposals to support and improve the protection of the character and heritage of canal towpaths in policy SI17 B (as amended). It would also remove the requirement to explore opportunities for new, extended, improved and inclusive access infrastructure on to towpaths. We suggest that in both of these examples, such an approach would not be the most appropriate strategy for the sustainable development of London.

Transport Policies (Suggested Amendment)

The Trust has previously commented on the Mayor's Healthy Streets initiative in our response to his Draft Transport Strategy and Draft Environment Strategy. We have expressed support for the principles and ambitions behind the initiative but suggested that the 'healthy streets' agenda should be expanded to recognise the opportunities that waterway towpaths provide for sustainable, healthy travel. Whilst we consider that the plan provides sufficient scope for local planning authorities to plan for and secure improvements to the Trust's towpaths as sustainable travel routes (policy SI16, for example), we remain disappointed that these appear to be seen as separate from the Healthy Streets initiative (see para 10.2.1 for example).

We welcome the fact that policies in the waterway section of the sustainable infrastructure chapter do not seek to categorise towpaths as walking or cycling infrastructure, which is consistent with their shared-use nature. As noted above, these policies provide support for local planning authorities to plan for and secure improvements to the Trust's towpaths regardless of whether they are considered to fall within the scope of policy T5 (Cycling) or not. However, we do find it curious that there is no policy in the transport section on walking, or links back to policies on the public realm, for example.

The Trust considers that there are opportunities to build on the work done by ourselves, TfL and the boroughs to improve sections of our towpaths as designated Quietways, reflecting their shared use nature. The Trust is currently working with TfL, the relevant London boroughs, The Royal Parks and other partners to roll out Quietway schemes in Regent's Park and on the Grand Union Canal towpath between Paddington and West Drayton. We believe that these will provide excellent facilities for a variety of different types of cyclists, from novices to considerate commuters, and an improved experience for pedestrians and other waterway users along a route that links important destinations and growth areas.

Our 'Better Towpaths for Everyone - Greenways & Quietways' publication has previously made the case that there are opportunities to deliver further improvements to our network of towpaths in London, in order that they are able to deliver better sustainable transport routes and associated wellbeing benefits. A River Lee Quietway in East London would be a strategic intervention linking several boroughs and building upon previous investments. This would link London Plan Opportunity Areas and Housing Zones at North East Enfield, Meridian Water, Tottenham Hale, the London Legacy Development Corporation Area and Poplar Riverside, neatly complementing Crossrail 2. It would provide an improved route for walkers and cyclists travelling between these areas or on to other nearby key centres, such as London Docklands. As well as linking existing and planned population and employment centres, such a route would also provide improved access to our waterways for their own sake, offering the opportunity to access recreational, cultural, historic or community experiences. Beyond the waterway corridors themselves, it would also improve access to the open spaces and recreational facilities of the wider Lee Valley Regional Park, Queen Elizabeth Olympic Park and Victoria Park, for example. We also recommend extending the benefits of the Grand Union Canal Quietway further west from West Drayton through the Colne Valley Regional Park to Uxbridge and to develop a branch that follows the line of the canal to the Thames at Brentford.

We are concerned that there does not appear to be a scheme within table 10.1 that such schemes would neatly fall into, if a narrow definition of 'streets' is applied through the Healthy Streets initiative. Future Quietways (or similar) are wider in scope than the proposed walk and cycle to school / work / local communities schemes and can relate to routes that would not be covered by the Walk London Network. We suggest that future Quietways / strategic shared use routes should be part of the Mayor's infrastructure planning to support the London Plan.

Implementation Policies

The Trust supports the suggestion in para 11.1.51 that there is an opportunity to explore new mechanisms to ensure that those who benefit from land value uplift resulting from good-quality green infrastructure contribute to its maintenance and improvement. The Trust has been successful in reaching agreements that achieve this in parts of London, such as at Kings Cross, but this often relies on the developer realising the benefits of our waterways. We consider that there could be great benefit in mandatory requirements where the green (and blue) infrastructure provider and the developer / landowner is not able to reach such an agreement. We would like to understand more about the Mayor's idea and to be involved in helping to develop it, including by sharing evidence of the benefits of our waterways.