



Canal &
River Trust

09/12/16

A City for All Londoners Consultation Team
Greater London Authority
City Hall
The Queen's Walk
London
SE1 2AA

Dear Sir/Madam,

A CITY FOR ALL LONDONERS

Thank you for the opportunity to comment on a City for All Londoners, Mayor Sadiq Khan's statement of ambition for his time in office. The Canal & River Trust (the Trust) supports many of the policies and priorities identified in the document. Furthermore, we consider that there are many priority areas for the Mayor where there are synergies with the Trust's vision and aims and where we can help the Mayor to achieve his ambitions. As such, we welcome the Mayor's intention to work with any organisation that wants to work with him in the interests of Londoners.

The Trust is the guardian of 2,000 miles of historic waterways across England and Wales, of which approximately 60 miles 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". 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 improve physical and mental health, bring communities together and encourage economic development. In many ways, thriving waterways deliver many of the same objectives that the Mayor is hoping to achieve through the "Healthy Streets" initiative set out in a "City for All Londoners".

With the support of academics and an External Reference Group of expert practitioners, The Trust has developed an Outcome Measurement Framework (OMF) to help us assess the economic, social and environmental benefits that our waterway corridors provide to transform places and enrich lives. We would be happy to work with the Mayor to see how our mutual interests could be supported, for example, through his proposal to take forward natural capital accounting to quantify the benefits of the city's green spaces. The Trust would be pleased to share the principles, indicators and measures of our OMF so that the societal benefits associated with all green and blue spaces in London can be presented to show London as an exemplar green / blue city within a global context.

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The Trust's waterways form, in our view, a key part of the Blue Ribbon Network currently set out in the London Plan. Amongst other things, they provide an important space 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.

The Trust's waterways form an important part of 15 boroughs north of the Thames and two Mayoral Development Corporations. They are adjacent to or within 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.

Whilst there are opportunities to improve the contribution that the waterways make to the sustainability and attractiveness of London as a place to live, work and visit wherever they are, these areas provide particularly good opportunities to design places in ways that celebrate and encourage thriving waterways. Some of the more developed Opportunity Areas, such as Kings Cross, Paddington and the Olympic Park provide excellent examples of how the waterways can contribute to regeneration and benefit from them. We would encourage the Mayor, local authorities and developers to engage the Trust early on in the masterplanning of major developments, as many are already doing. To encourage this, we would like the London Plan to more actively promote the benefits of London's waterways than policy 7.30 currently does.

We note that the intention is that comments made in response to a City for All Londoners will be taken into account by the Mayor when preparing more detailed statutory strategies, such as the London Plan. We look forward to discussing and commenting in more detail on these documents but we would like to make the following comments on how the waterways can support the Mayor's policies and priorities.

The role of the waterways in supporting recreation, sustainable travel and improving health

As the Mayor notes, land in London is in high demand for many competing priorities. We welcome his focus on "good growth" and the recognition of the need to balance protection of infrastructure and the environment with meeting development needs. We also welcome the recognition that

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access to green space can have a positive impact on people's mental and physical health and the key role that public space has in defining the character of the city and supporting community cohesion. We consider that London's waterways (including their towpaths) make a valuable contribution to making London an attractive and liveable city. The London Plan could help to maximise their benefits as spaces of green/blue infrastructure for recreation by:

- Requiring that new developments alongside the waterways are well designed so that they provide natural surveillance over the waterway and waterside spaces (encouraging cycling and walking), respect their character, heritage and environmental importance and support (not hinder) on-water uses.
- Encouraging boroughs and developers to see waterways as important open spaces and sustainable transport corridors that can be improved through planning obligations and/or the Community Infrastructure Levy.
- Supporting existing and new on-water uses that can provide opportunities for recreation and a range of mooring types (commercial, residential and visitor) that help to support thriving and well managed waterways, as well as helping to meet London's development needs.
- Where waterside land is dominated by industrial uses that don't require a waterside location, relocating some industrial land to other parts of the city and supporting more mixed use developments that create more attractive places for people to live, work and visit.
- Continuing to ensure that proposals for new tall buildings alongside our waterways need to take into account the local character, the environment and do not have an unacceptable impact on navigation.

We believe that the Mayor's policies on the Blue Ribbon Network should provide flexibility to take account of the particular character of the waterway or waterspace that would be affected by new development. The Trust's waterways in London include stretches that are both very urban and rural in their character. They include the relatively wide (and deep) waterspaces of the Docklands and more narrow stretches of canal, as well a number of off-line basins. The acceptability of developing new structures in the waterways, for example, may vary between these locations.

Whilst we very much welcome the principles of "healthy streets" that the Mayor has set out, we would be disappointed if improvements focused solely on London's streets. We consider that the towpaths of London's waterways can provide an attractive, traffic-free and green corridor for people to walk and, considerably, cycle across London. The Trust is already working with Transport for London to deliver a Quietway primarily on the towpath of the Grand Union Canal in west London, thereby enhancing the role that it plays as a sustainable transport route. We consider that there are opportunities to designate a Quietway through the Lea Valley in east London and have begun discussions with TfL about this. We believe that there are still significant opportunities for investment in Outer London, where London's canal towpaths provide an excellent, attractive and traffic-free sustainable transport resource in areas where travel is currently more car-dependent. We welcome the Mayor's intention to look for more opportunities to open Quietways but we would welcome a more definitive statement of support in his forthcoming Transport Strategy.

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There are some opportunities for our waterways to do more to support the Mayor's aspirations to reduce congestion, carbon emissions and air pollution by encouraging their use to transport freight by water, in certain circumstances and certain locations. 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, construction materials and demolition waste associated with new waterside developments and new strategic infrastructure (Crossrail 2 and HS2). This is currently supported by the London Plan but we would encourage the Mayor to consider whether he can go further in the revisions to it, for example by requiring very large developments alongside navigable waterways to produce and submit a feasibility assessment, which could then be evaluated by a freight professional panel e.g. individuals within London's Waterway Commission. We would be open to discussing what other opportunities might exist to transport freight on our waterways, within their constraints. Options that have been considered in the past, especially on the Lee Navigation, are the transportation of household waste from major development sites adjacent to the waterways or waste derived fuel from energy from waste plants.

The role of the waterways in supporting community cohesion and active citizenship

The Trust welcomes the Mayor's recognition of the key role that public realm has to play in providing spaces where people can come together. As we have explained, where they are well designed, we consider that spaces on and alongside the Trust's waterways provide highly attractive public spaces that can provide this opportunity.

There are other, less physical, ways in which the Trust's waterways can have a beneficial impact on community cohesion, health and skills development. We offer Londoners the opportunity to volunteer to help us protect and improve our waterways. We also offer local organisations the ability to adopt stretches of the network. Getting involved in such projects can help individuals to build their confidence, learn new skills and improve their health (mental and physical), amongst other things. It also provides an excellent opportunity to strengthen community links and bring people of all backgrounds together. Floating classrooms can be a beneficial tool to enable the city's children to explore its heritage and to learn about environmental matters. We have recently submitted bids to HLF and BIG Lottery for programmes targeting young people (11-25yr olds) to engage them in the heritage sector and develop new outlooks, policies and practices from young people for heritage organisations. If successful, this would have some delivery in London. We consider that these programmes support many of the social policies and ambitions that the Mayor has set out in a City for All Londoners.

Major Waterside Regeneration and Construction Projects

We have outlined above the number of major development opportunities that benefit from the inclusion of, or proximity to, our waterways. As we note, there are some excellent examples of regenerated places where the Trust (and British Waterways before it) has been heavily involved either as a landowner of waterside land or as an active stakeholder in the planning process. We are

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keen that the Mayor and boroughs continue to actively engage with us in developing major waterside regeneration projects where we are a statutory consultee or a key landowner.

We are supportive of the Mayor's commitment to deliver Crossrail 2 and use it as a catalyst for the regeneration of the Upper Lea Valley. We consider that the River Lee Navigation has an important, multi-functional role to play in supporting the delivery of Crossrail 2 and the economic growth, new housing opportunities and sustainable development planned in the area. The Trust considers that there are opportunities to use our waterways, in particular the Lee Navigation, to transport construction materials and waste by barge as part of the construction of Crossrail 2, thus reducing congestion, carbon emissions and air pollution and leaving facilities in place to support the sustainable development of the wider area. We recently met with members of the Crossrail 2 team to begin dialogue on this and other issues, such as the need to ensure that the construction of Crossrail 2 does not have detrimental impact on our historic infrastructure.

The Trust and our joint venture partners are continuing to bring forward development proposals across the city, including within the Upper Lea Valley at Tottenham, that will help London to meet its development needs, create sustainable places and contribute to thriving waterways. We look forward to working with the Mayor and the boroughs to develop and deliver these schemes, in accordance with existing and emerging London and local planning policies.

We note that the Mayor intends to progress plans for a new bridge for pedestrians and cyclists between Rotherhithe and Canary Wharf. The Trust is a significant land owner within Docklands. We look forward to seeing more detail on the options for delivering this scheme and its benefits and impacts.

The contribution of the waterways to meeting London's development needs

In addition to the development of waterside spaces, the Trust's waterways in London are increasingly playing a role in meeting London's development needs. It is important that the London Plan and the boroughs' local plans recognise this and assist the Trust in managing the impacts to ensure that the waterways continue to provide the range of benefits that we set out in this letter.

Over the past 6 years the number of boats on London's waterways has increased significantly, from 2164 in 2010 to 4820 in 2016 (123% growth). Over this period, the number of boats without a home mooring, i.e. those that should be continuously cruising the network, has almost quadrupled (417 in 2010 to 1641 in 2016). The Trust is developing a London Mooring Strategy to respond to this growth but we need to work with other organisations, in particular the public sector, to achieve its aims.

The Trust has recently undertaken a survey of London's boaters ("Who's on London's Boats") to try to estimate the number of people living on their boats in London, what their motivations are for doing so and what aspirations they have for finding a more permanent location (including a permanent mooring) in which to live. We are currently analysing the survey results and hope to be able to publish the main findings before Christmas 2016.

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You will be aware that 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”. We are interested to know what role the Mayor intends to take in this and how the London Plan will respond, given the fact that London’s waterways cross so many London borough boundaries. At minimum, we consider that the London Plan should recognise that living on a boat on London’s waterways is a housing choice for a rapidly growing number of Londoners. Planning policies should support the provision of new moorings and facilities in appropriate locations, including encouraging developers to make provision for them within new waterside developments, especially those Opportunity Areas and Housing Zones that straddle or are adjacent to our waterways.

The Trust also considers that its waterways make a positive contribution towards London’s economic growth and tourism offer, and should continue to be supported to do so. This contribution is many faceted, including:

- A way to travel to and within London and a place where visitors can stay (including those with their own boats, those hiring boats and those staying on hotel boats).
- Floating shops, offices, cafes and restaurants.
- Floating markets.
- Trip boats.
- Canoe trails, which the Trust is working with partners to deliver in other parts of the country.
- Attractive places for tourists to walk and cycle, including to destinations such as Regents Park, London Zoo and the Olympic Park.
- Important cultural and heritage assets (see below).
- The docking of large ships in Docklands.

We ask that the Mayor adopts policies that support the contribution that these uses can make to London’s economy and tourist offer so that where they require planning permission boroughs should be encouraged to grant it, in the right locations.

As noted above, we consider that our waterway network can make a positive contribution to the Mayor’s efforts to improve air quality in London by offering attractive and safe routes for people to walk and cycle. Boaters mooring on the waterways can support this by providing an element of natural surveillance. The Trust would like to see more detail on the Mayor’s proposal for a new Clean Air Act before commenting on the potential implications for the Trust and our boaters. The Mayor may be aware, however, that the Trust is currently working with LB Islington on a project to provide new electricity points for boaters mooring on the Regent’s Canal. This will help to enable boaters to enjoy power and heat on their boat without the need to run their engines or use wood burning stoves, thereby reducing emissions and noise. We would be happy to consider additional opportunities if funding were to be available.

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The role of the waterways in supporting environmentally sustainable development

As well as their intrinsic value as networks of green and blue space, the Trust's waterways currently play an important role in supporting the environmentally sustainable development of London and can do more to support the Mayor's ambition of a zero-carbon London by 2050 and of a city that produces more of its own energy in the shorter term.

There is the potential for using water from the Trust's waterways for heating and cooling new developments. Our waterway network was included in the National Heat Map produced by the Department of Energy & Climate Change (now Department for Business, Energy & Industrial Strategy) and it provides an overview of the opportunity that exists in London. We estimate that there is approximately 45MW of heating and cooling potential in our London waterways, which could supply approximately 24,000 homes in London, if effectively utilised. The technology required to deliver cooling from canal and dock water is already successfully used in London.

As well as the thermal energy that can be extracted, the Trust considers that the presence of waterways within the city has a beneficial urban cooling effect, which will be increasingly important as the city adapts itself for climate change.

As noted previously, in many circumstances and subject to the Trust's agreement, surface water can be sustainably drained from developments into our waterways, thus reducing the pressure on mains drainage infrastructure. Utilities and communications infrastructure can also be provided within our waterway corridors. We encourage the Mayor, developers and boroughs to positively consider these options when preparing new major development schemes and to engage with the Trust early.

The contribution of the waterways to London's culture

The Trust's waterways are an important part of the nation's cultural heritage. Development on or alongside them must be sensitive to this and protect the most important historic spaces and structures from harm. We note that the Mayor considers it to be a key principle that development must not diminish the city's historic environment and protected heritage assets and we welcome this.

The Trust is considering options for the commemoration of the Regent's Canal's bicentenary in 2020 and is keen to discuss ideas with the Mayor. We want to develop an ambitious programme which recognises the canal's major contribution to the development of North London and leaves a lasting legacy for the communities who now live on and alongside it.

The waterways are already focal points for more modern cultural projects, such as the Floating Cinema. The Trust is actively developing new works and projects through its "Arts on the Waterway" programme with the Arts Council that supports new art work connected to the waterways. London's canals have become popular backdrops as film locations, from blockbusters such as Mission Impossible, James Bond and Paddington, to numerous TV dramas and photoshoots. We would welcome the Mayor's support for the Trust's cultural programmes through his proposed cultural

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infrastructure plan, which should promote London as a global cultural centre and ensure that this is supported, not eroded, by new development.

In summary, the Trust considers that there are many ways in which our waterways can support the Mayor's aspirations for London. We consider that the London Plan review provides the opportunity to look again at the policies on the Blue Ribbon Network, which we consider became overly focused on the movement of people and freight in the previous administration's plan, and that the Mayor's other strategies should recognise the benefits of the waterway, wherever relevant. We look forward to commenting further on all of these as more detailed proposals emerge.

Yours faithfully

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