

CENTRAL LEASIDE AREA ACTION PLAN – RESPONSE TO CONSULTATION COMMENTS ON THE SUSTAINABILITY APPRAISAL SCOPING REPORT

This table sets out the comments received from consultation on the scope and level of detail for the Sustainability Appraisal of the Central Leaside AAP. It also includes the responses to the comments and the actions that will be taken as a consequence.

The next stage of the process will be the production of a Sustainability Appraisal (SA) Report, which will assess the options that are put forward in the Area Action Plan itself against the sustainability objectives identified in the Scoping Report. Thus, the SA Scoping Report itself will not be revised, however this table (and elements from the Scoping Report) will form part of the SA Report to be produced subsequently. The actions described herein will also be applied to the SA Report.

| Comment | Response | Action |
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| Metropolitan Police (Crime Prevention Design Advisor) | | |
| 1) Lea Valley Athletics Stadium have been excluded from the AAP - would be ill-considered to ignore the impact on neighbouring businesses / residents. | Noted. | The impact of the stadium will be considered within the assessment of effects on crime / disorder. A recommendation has been made to extend the boundary of the AAP study to include Picketts Lock. |
| Enterprise Enfield | | |
| 2) Indicators could recognise the key sectors identified in Mayoral Strategies: social, voluntary, creative, innovation and knowledge transfer | Noted. | These indicators will be considered for inclusion in the monitoring framework. |
| 3) Quoted figures for business registrations / de-registrations are higher than the normally quoted VAT ones and lower than the accepted business stock figures | Possibly so, however the figures quoted are official and therefore presumably reliable. Data is taken from the Government National Statistics website. | None. |
| 4) Some indicators to assess the strength of lifestyle businesses required | Noted. | These indicators will be considered for inclusion in the monitoring framework. |
| 5) A higher priority needs to be given to the creation of wealth in the key sustainability issues | Agreed. | A decision-making criterion will be added to the SA Objective concerning economic growth. |
| British Waterways | | |
| 6) Disappointed that there is no reference to BW in the report | Noted. | Reference will be made in appropriate sections of the AAP and later SA reports. |
| 7) BW encourages the use of waterways for freight and construction waste | Noted. Table 8, p34, refers to the need to <i>maximise the potential of the River Lea for transport of people and freight.</i> | None required. |

| Comment | Response | Action |
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| 8) No reference to Tree Preservation Orders in the report | Agreed. | A decision-making criterion addressing TPOs will be added to the SA Objective concerning open space and the historic environment. |
| 9) Reference should be made to PPG15 in Table 4 | Noted. | The policy will be reviewed prior to the assessment phase of the SA |
| 10) The Blue Ribbon Network (London Plan) and BW's Waterways and Development Plans should be considered | Noted. | The relevant policies will be reviewed prior to the assessment phase of the SA. |
| Thames Water | | |
| 11) The need for new development to be co-ordinated with infrastructure demands should be a key objective | Agreed, although the Scoping Report does address this issue in Table 8 (sustainable use of water). However, it could be made clearer. | Objective will be incorporated into future reports where appropriate. |
| 12) The report should reference water efficiency and water quality as key issues | The Scoping Report already addresses these points in Table 8, p32, as decision-making criteria under the sustainable management of water resources SA Objective | None required. |
| English Heritage | | |
| 13) The European Landscape Convention should be included in the context review | Noted. | The relevant policies will be reviewed prior to the assessment phase of the SA. |
| 14) A <u>major concern</u> is the absence of information concerning archaeological resources | Agreed. | A decision-making criterion highlighting the sensitive status of Central Leaside will be added to the SA Objective concerning open space and the historic environment this incorporates archaeological resources. |
| 15) The report should show scheduled monuments and archaeological priority areas | Agreed, if this information is readily available. | A new map will be created for the SA Report to show this information, if it can be sourced in an appropriate format. |
| 16) All Listed Buildings, not just those at risk, should be included as an indicator | Noted. | This indicator will be considered for inclusion in the monitoring framework. |
| 17) An archaeological impact assessment of the site would be of great value | Such an assessment could be considered as a planning condition but is not appropriate to the SA | None. |
| 18) Archaeological records from Haringey and Waltham Forest should be reviewed | Waltham Forest is not covered by the AAP. | The section of Haringey covered by the AAP will be investigated further. |

| Comment | Response | Action |
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| 19) Conservation areas in Haringey and Waltham Forest should be included in Map 6 | Disagree, since these conservation areas will not be affected by the AAP. | None. |
| 20) PPG15 should be added as a source for the key issue concerning archaeology | Noted. | The policy will be reviewed prior to the assessment phase of the SA |
| Highways Agency | | |
| 21) HA wish to see improvements in public transport in the AAP | Noted. However this is an issue for the AAP rather than the SA. | None required. |
| 22) HA would support a balanced AAP including housing and employment | Noted. However this is an issue for the AAP rather than the SA. | None required |
| 23) HA will consider whether the AAP will lead to air quality compliance problems | Noted. | None required. |
| 24) The SA should consider evidence concerning air quality impacts | Agreed. | This is the intention insofar as the data is available to facilitate this. |
| 25) HA proposes additional indicators: Trips by non-car modes Proportion of new development meeting travel plan objectives Growth of traffic on key routes | Noted. | These indicators will be considered for inclusion in the monitoring framework. |
| 26) Targets and monitoring of the trunk route network should be included | Noted. | This indicator will be considered for inclusion in the monitoring framework. |
| 27) DTLR Circular 04 / 2001 should be reviewed | Agreed. | The Circular will be reviewed prior to the assessment phase of the SA. |
| Lee Valley Park | | |
| 28) Would like reference to Lee Valley Park in Introduction | Noted. | Will reference the Park in the SA Report. |
| 29) Substantial areas of open space exist within the AAP boundary | Noted. | None required. |
| 30) Should the assessment consider the benefits of access to the Lea Valley Athletics Stadium? | Noted. | The presence of the stadium has also been highlighted by the police and it will be taken into consideration during the assessment phase of the SA and it has been recommended that the AAP boundary be amended to include the stadium. |
| 31) The review of the Park Plan in Appendix 1 should highlight the need for improved access | Agreed. | This will be taken into consideration during the assessment phase of the SA. |

| Comment | Response | Action |
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| 32) Explicitly state the need to make open spaces more accessible in Table 4 | Agreed. | A decision-making criterion will be added to the SA Objective concerning access to open space. |
| 33) Possible new indicator relating to different categories of open space and their distances from homes and businesses proposed for Table 5 | A useful suggestion. | The indicator will be considered for inclusion in the monitoring framework. |
| 34) Surprised that the status of biodiversity assets is unclassifiable | This and other similar ratings have caused much confusion. It means that insufficient data is available within the AAP geography to classify the status of the given indicator. | None for the moment but a different means of conveying the information will be required for future scoping reports as this clearly does not work well |
| 35) Fourth Environmental Objective in Table 8 should be linked to Sustainability Issues 16 and 17 | Noted. | In future reports, the location of and physical access to and reducing reliance on the car will be linked to the need to make green and open spaces and the historic environment accessible. |
| 36) Will the SA / SEA include Appropriate Assessment? | The need for an Appropriate Assessment is being considered by the Council | None required, however the SA / SEA will draw upon any available findings. |
| Environment Agency | | |
| 37) No SFRA undertaken and is a key input into the SA process | Noted. | The SFRA is now underway |
| 38) A key objective of the AAP should be to ensure development does not increase the risk of flooding and takes all available opportunities to reduce the risk | Flood risk is addressed by existing objectives. However ensuring that development takes all opportunities to reduce the risk is not addressed. | Ensuring that opportunities are taken to reduce risk will be considered in future appraisals where appropriate. |
| 39) Table 3 must refer to PPS25 not PPG25 | Agreed, however PPG25 was the relevant document when the Scoping Report was produced. | None |
| 40) Table 4 should identify the need for a sequential approach to allocations and the need to reduce flood risk in PPS25 | Noted. | Reference will be made in appropriate sections of the AAP and later SA reports. |
| 41) Environment section of Table 5 does not mention flood risk and should do so, including an indicator relating to the number of properties at risk from flooding | A useful suggestion. | The indicator will be considered for inclusion in the monitoring framework. |

| Comment | Response | Action |
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| 42) Table 7 mentions the Salmons Brook Flood Alleviation Scheme but it is unclear when this will commence | Noted | None required. |
| 43) Re-word SA Objective on flooding to read: "will the policy ensure that development is not put at risk of flooding and flood risk is reduced where possible?" | Agreed. | The SA Framework will be amended accordingly. |
| 44) EA encourages the use of SUDS | Noted. | Appropriate as a mitigation measure. |
| 45) Suggest an additional indicator on the use of water per capita | A useful suggestion. | The indicator will be considered for inclusion in the monitoring framework. |
| 46) All new buildings should make use of water-saving technology | Noted. | Appropriate as a mitigation measure. |
| 47) North London Sub-regional Development Framework not referenced in relation to the environment | Noted. | The Framework will be reviewed prior to the assessment phase of the SA. |
| 48) North London River Restoration Strategy should be reviewed | Agreed. | The Strategy will be reviewed prior to the assessment phase of the SA. |
| 49) The Water Framework Directive should be reviewed | Agreed. | The Directive will be reviewed prior to the assessment phase of the SA. |
| 50) The current status of the water quality indicators is not 'unclassifiable' | This and other similar ratings have caused much confusion. It means that insufficient data is available within the AAP geography to classify the status of the given indicator. | None for the moment but a different means of conveying the information will be required for future scoping reports as this clearly does not work well |
| 51) Table 7 should identify degraded watercourses as a key issue | Noted. | This key issue will be addressed by adding an appropriate decision-making criterion to the water SA Objective. |
| 52) Table 8 should include additional decision-making criteria relating to protection / enhancement of water courses and biodiversity | Agreed. | A decision-making criterion will be added to the SA Objectives concerning water and biodiversity. |
| 53) Emphasis should not just be on designated areas of biodiversity value | This issue is already covered in the SA Framework (p32): <i>Will the policy... protect local sites of conservation value?</i> | None required. |
| 54) Map 2 (biodiversity) should identify the rivers present in the AAP area | Disagree. The map is intended to show designated sites only. | None required. |
| 55) An 8 metre buffer zone will be sought around watercourses | Noted. | This will be taken into consideration during the assessment phase of the SA. |
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| Comment | Response | Action |
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| Natural England | | |
| 56) All comments received were supportive of the scoping report. | Comments welcomed | No action required |
| Bush Hill Park Conservation Area Study Group | | |
| 57) More selection and identification of the primary criteria for the policies, plans, programmes, strategies and initiatives required. | Noted, however the review is required both by the SEA Regulations and the government guidance on Sustainability Appraisal | None, since the work has now been completed. |
| 58) Concern about deprivation found in the surrounding areas (Map 7). Clearly employment must be given lead priority. | Employment has priority within the objectives of the Area Action Plan and the sustainability appraisal will assess the options against these objectives. | No action required |