



**STATEMENT OF COMMON GROUND (DRAFT)**

**BETWEEN**

**ENFIELD COUNCIL**

**AND**

**GREATER LONDON AUTHORITY (GLA)**

In respect of Enfield Council's Edmonton Leaside Area Action Plan (2017) (ELAAP)

This Statement of Common Ground has been prepared to identify areas of agreement and disagreement between Enfield Council and the GLA on matters relating to the Council's Submission Edmonton Leaside Area Action Plan (2017).

| <b>Issue (Document Order)</b>         | <b>Representation Ref. No</b> |
|---------------------------------------|-------------------------------|
| Policy EL1                            | 27 C                          |
| Chapter 6                             | 27 D                          |
| Chapter 5, Policy EL4                 | 27 E                          |
| Chapter 5, Policy EL10                | 27 H                          |
| Chapter 5, Policy EL11                | 27 I                          |
| Diagrams and maps                     | 27 J                          |
| Policy EL2, Policy EL14 and Table 6.2 | 27 A                          |

**Notes on agreed amendments:**

1. **Bold underlined text indicates an addition to the ELAAP text**
2. ~~Strikethrough text indicates a deletion to the ELAAP text~~

**Areas of Agreement:**

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| <b>Policy EL1</b> | <b>27 C</b> |
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Both parties agree that the wording in Policy EL1 regarding the 35% affordable housing level will be updated as follows:

*All residential development proposals at Meridian Water will be expected to achieve a minimum of 35% affordable housing, ~~measured as a proportion of the total number of units, or in part based upon the proportion of habitable rooms.~~*

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| <b>Chapter 6</b> | <b>27 D</b> |
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Both parties agree to include an additional map showing current SIL and LSIS designations within the ELAAP area in Chapter 6.

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| <b>Chapter 5, Policy EL4</b> | <b>27 E</b> |
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Both parties agree that the sequential test should be referenced in Policy EL4 by inserting the following as a 4<sup>th</sup> bullet point:

- **That a sequential test and retail impact assessment have been applied.**

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| <b>Chapter 5, Policy EL10</b> | <b>27 H</b> |
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Both parties agree that reference to active frontages should be clarified in Policy EL10 8<sup>th</sup> bullet point:

- *At ground floor level provide an attractive, and ~~where relevant active,~~ frontage to the street, road or other **publicly** ~~publically~~ accessible area*

Both parties agree to amend policy wording referencing single aspect dwellings to meet the Mayor's Housing SPG Standard 29, updating Policy EL11, Part B, 1<sup>st</sup> bullet point as follows:

- ~~Ensure that no more than 10% of all north facing residential units are single-aspect~~ **Minimise the number of single-aspect dwellings, and avoid dwellings which are north-facing or exposed to noise levels above which significant adverse effects on health and quality of life occur, or which contain three or more bedrooms;**

Both parties agree that the AAP should include keys for: Figure 2.3, Figure 2.4, Figure 8.1 and Figure 10.1, as set out in the Schedule of Minor Amendments.

Both parties support Meridian Water as a long-standing strategic regeneration project that will help to address inequality in Enfield and bring forward the quantum of new homes and jobs to meet targets as set out in the current London Plan and emerging draft New London Plan. To this end, both parties agree that the ELAAP must support delivery of homes beyond levels established in the Core Strategy 2010 and as reflected in the Council's housing trajectory. Meridian Water provides a substantial proportion of the borough's units, particularly in years 5 to 15. Meridian Water is therefore critical to the Council achieving its housing requirements over the medium to long-term.

Meridian Water is identified as one of London's strategic regeneration areas as identified in the adopted Upper Lee Valley Opportunity Area Planning Framework (2013) and will undergo transformational regeneration which includes providing for sustainable new communities that have access to employment opportunities. One of the fundamental objectives of the regeneration of Meridian Water is to raise the number, variety and quality of local jobs and to achieve higher wage opportunities.

Regeneration to deliver thousands of homes in the ELAAP is consistent with the current London Plan, which has, over numerous iterations, identified the Upper Lee Valley Opportunity Area as an

important contributor to increasing London's housing and employment supply as articulated in the adopted ULV Opportunity Area Planning Framework. The new Draft London Plan (2017) continues this approach, with Policy SD1 expecting boroughs to use Development Plans (such as the ELAAP) to 'set out how they will encourage and deliver the growth potential of Opportunity Areas' and 'support development which creates employment opportunities and housing choice for Londoners'.

The Mayor of London has recognised the importance of housing provision at Meridian Water through awarding it Housing Zone Funding and most recently by supporting the Council's Housing Infrastructure Fund (HIF) bid to forward fund key infrastructure to unlock development

**Areas of both Agreement and Disagreement:**

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| <b>Policy EL2, Policy EL14 and Table 6.2</b> | <b>27 A</b> |
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**Areas of Agreement**

The GLA's starting position as reflected in the Mayor's letter of 16 March 2015 supported the principle of some release of SIL.

In several discussions between both parties it has been established that whilst the ELAAP proposes release and de-designation of the whole of Harbet Road SIL land at Meridian Water, the general conformity issue raised by the GLA on de-designation relates to the northern area of Harbet Road, north of the proposed central spine route, referred to as 'the Causeway'. The northern part of Harbet Road is a particularly valuable employment location due to its accessibility onto the strategic road network, making this a prime industrial land resource to service London. Both parties agree the southern portion (south of the proposed route) is more suitable for de-designation and has been accepted for release, subject to intensification, consolidation and co-location of industrial uses as in accordance with the draft new London Plan.

In line with further evidence work to support the Council's approach to provide for intensification and consolidation of industrial uses, as presented in Appendix 1 both parties agree that the de-designation of SIL at Meridian Water is not intended to preclude 'B' uses in the future, but rather aims to secure greater future opportunities for industry, technology and new production at both Meridian Water and within the wider ELAAP planning area.

Both parties also agree that the issue of SIL capacity across Enfield and London is part of a wider discussion- the issue goes beyond SIL release at Meridian Water alone. It must be part of a

forthcoming conversation on Enfield's emerging new Local Plan, alongside the policies and approach set out in the draft new London Plan. It will also be relevant for the refresh of the Upper Lee Valley Opportunity Area Planning Framework, which addresses Enfield's prime industrial corridor, located between the North Circular Road and Junction 25 of the M25.

In discussion, the GLA have accepted that the draft new London Plan places Enfield in a challenging position due to the combination of a 135% increase in its housing target and a categorisation to retain SIL capacity.

The Council, GLA, TfL and Arriva all agree that the operations, future investment and employment-generating activities of the bus depot must be sufficiently acknowledged and addressed within the ELAAP. Statements of Common Ground between the Council and TfL and between the Council and Arriva seek to address modifications to this end.

### ***Areas of Disagreement***

**The Council** position is that de-designation of Strategic Industrial Land is required at Meridian Water to allow for flexibility, to make the best use of land and to maximise development densities for both employment and other land uses necessary to optimise regeneration. This will enable the Council to deliver against a variety of competing priorities. These include delivery of sufficient jobs, homes (especially affordable homes), and supporting infrastructure, required to meet local and wider need and to address the need for socio-economic regeneration, in line with national and London Plan policy, within the limited supply of land available. The release of SIL designation at Harbet Road is the only way to deliver and achieve a viable balance between new homes, employment and infrastructure at Edmonton Leaside. One of the fundamental employment objectives of Meridian Water is to raise the number, variety and quality of jobs, and to achieve higher wage opportunities for Enfield residents in an area of significant deprivation. In this context, the Council firmly maintains that protecting SIL land in Meridian Water, to the extent desired by the GLA, would undermine the core objectives of the submitted Plan. Furthermore, the borough's extensive supply of SIL outside Meridian Water will continue in its designation, to fulfil its industrial function and to provide for the type of industrial and warehousing activities to support London's economy and supply sectors, which both the Council and GLA value and want to see protected.

The Council is committed to Meridian Water being London's 'New Home of Production' and market evidence to date indicates that there is every opportunity to capitalise on new manufacturing uses being incorporated beneath residential.

Further, the Council maintains that while SIL release in the ELAAP may have inconsistencies when considered against individual SIL policies in the London Plan, as is not unusual for a borough development plan document, the ELAAP is nonetheless, on balance, in general conformity with the London Plan and its wider policies and aims

Additional work has been undertaken to demonstrate to the GLA the Council's approach for intensification and consolidation of industrial uses within the ELAAP boundary. This shows that floorspace capacity of SIL within the ELAAP area can be maintained and confirms the Plan's general commitment to SIL and recognition of its importance.

**The GLA** welcomes recent discussions and the Council's work on showing re-provision of SIL capacity through intensification, and through consolidation of floorspace elsewhere, as well as through new employment floorspace to be brought forward within the Plan boundary. However, the GLA remains concerned about the extent of industrial land to be de-designated and the nature and quality of the land proposed for re-provision.

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**Signed on behalf of Enfield Council**

**Signed on behalf of GLA**

Signed \_\_\_\_\_

Signed \_\_\_\_\_

Neeru Kareer BA (Hons) MSc MRTPI  
Head of Strategic Planning and Design (*interim*)  
Place

Darren Richards *insert qualifications and role details*

Date: \_\_\_\_\_

Date: \_\_\_\_\_