



thameswaterplanningpolicy@savills.com

Sent by email to: localplan@enfield.gov.uk

 0118 9520 500

25th June 2019

Edmonton Leaside Area Action Plan – Main Modifications Table – May 2019

Dear Sir / Madam

Thank you for consulting Thames Water Utilities (Thames Water) regarding the above. Thames Water are the statutory water and sewerage undertaker for the Borough are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Development) Regulations 2012. We have the following comments on the proposed Modifications:

Modification MM8 & MM8a – Policy EL8

We support the aim of the amendment, but as set out at the Examination Hearing we attended we do not consider it is satisfactory to leave the essential flood risk mitigation for Meridian Water until later on in the planning process. The flood risk compensation strategy should be sorted out as a matter of priority.

The Meridian Water area contains 2 areas of land owned by Thames Water as illustrated on the ‘Map of Land Ownership’, June 2017. These are known to Thames Water as: 1. Land to South of William Girling Reservoir/Lower Hall and 2. Land at Harbet Road.

These 2 areas of land are identified in the Level 2 SFRA, July 2013 and the more detailed Meridian Water Masterplan Options and Flood Risk Modelling Report March 2011 as the potential flood risk mitigation. The adopted Meridian Water Masterplan also shows these two areas as flood risk mitigation options and Public Open Space.

Thames Water have therefore tried to liaise with the Council to find out what the requirements are for Thames Water land, but the Meridian Water team had consistently indicated they didn’t need any Thames Water land and were reviewing the technical studies to see what land is required.

The EA response to Examination Inspector Question v on flood storage (letter dated 18/09/2018) sets out: “ *The original idea from the local authority was to create an upstream storage which has been replaced in favour of a storage area adjacent to the site at Lee Valley Regional Park. Realistic assumptions have been made as far as they have broadly assessed that there will be space to provide the required storage so that flood risk is made no worse (but not reduced). Downstream*

storage is not a factor.” On request the EA have clarified on 09/10/2018 the replacement flood storage area which does include Thames Water land at Harbet Road.

Thames Water were only made aware of the proposal to use Thames Water land at Harbet Road by the Council just before the Examination Hearings. However, the Council have still not entered into negotiations in relation to the acquisition of the land at a fair market value.

The Post Examination SoCG confirms: *“This land has been identified by the Council as suitable for compensatory flood storage and the need for these areas will be assessed and confirmed as part of a comprehensive Flood Risk Assessment that is due to be completed in July 2019 for the whole Meridian Water Masterplan area. However, at the time of signing this Statement both parties acknowledge that the land is retained operational land for the purposes of Thames Water fulfilling its statutory undertaking and has not been formally declared surplus.”*

As indicated in previous representations, our land at Harbet Road includes major underground infrastructure which could constrain the use of this land. Also Thames Water’s operational land assets can only be released for other uses should it be proven they are not required either now or in the foreseeable future for Thames Water’s operational use. As set out in SoCG TW are currently reviewing their operational need for the land within Meridian Water as part of PR19 and WRMP19.

Modification MM9 & MM9a – Policy EL9

We support the additional sentences relating to operational and health and safety considerations.

Modification MM13a – Policy EL13

We support the additional requirement regarding early discussions with Thames Water.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water’s free pre planning service are available at: <https://www.thameswater.co.uk/preplanning>

It would be helpful to make reference to this website in the new paragraph 5.12.0.

Modification MM14a/MM2a

We support the change not to reference Thames Water land as ‘open space’ or variations on this label which imply it is publicly accessible.

Modification MM14a

We support the amended text at Paragraphs 6.4.4, 9.1.5 and table 6.2 in relation to Deephams Sewage Works.

Modification MM18 – Policy EL18

We support the amended text to Policy EL18 in relation to Deephams Sewage Works as this was requested by Thames Water.

We trust that our comments are of use. If you have any questions please do not hesitate to contact David Wilson on 0118 9520 505.

Yours Faithfully

Thames Water Utilities Ltd