

**LONDON BOROUGH OF
ENFIELD (MERIDIAN WATER
STRATEGIC
INFRASTRUCTURE WORKS)
COMPULSORY PURCHASE
ORDER 2020**

**Town Planning Proof of Evidence of
Paul Jarvis BSC (Hons) M.R.T.P.I.**

PINS Ref. PCU/CPOP/Q5300/3258664

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This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 274852-00

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1 Introduction

1.1 Paul Jarvis

- 1.1.1 My name is Paul Jarvis. I am a Chartered Town Planner with a degree BSC (Hons) in Town and Regional Planning.
- 1.1.2 I am an Associate Director within Arup's Integrated City Planning team and responsible for leading a range of Town Planning projects. I regularly lead large teams of specialists, including town planners, urban designers, architects, engineers, transportation planners and environmentalists.
- 1.1.3 I have worked as a town planner for twenty-six years and have been a member of the Royal Town Planning Institute (M.R.T.P.I.) for over twenty-three years. I have wide experience in managing the submission of applications for major projects on behalf of public and private sector clients as well as preparing planning policy and guidance. I provide town planning advice to developers and local authorities throughout all stages of the planning process. This includes pre-application and post-application discussions with planning authorities and other stakeholders and preparation of planning statements and other associated documents to support planning applications.
- 1.1.4 I provided leadership to the team of specialists at Arup who prepared the planning application for the Meridian Water Strategic Infrastructure Works ('SIW'), which have been granted planning permission. I also led the planning process for the 'Meridian Water Phase two' planning application ('Phase Two'). Both the Phase Two and SIW comprise part of the wider regeneration proposal in respect of Meridian Water, described in greater detail in the evidence of Messrs John Reid and Matthew Bodley respectively ('the Scheme').
- 1.1.5 I am familiar with the site and surrounding area and I have visited the site on numerous occasions during the course of preparing the SIW and Phase Two applications and for the purposes of this Inquiry.
- 1.1.6 I now provide this proof of evidence in support of the compulsory purchase order ('the Order') which the London Borough of Enfield

(‘the Council’) is promoting in order to assemble the land necessary to deliver the SIW (‘the Order Land’).

1.1.7 I confirm the opinions expressed in this proof are my true and professional opinions.

1.2 Report Structure

1.2.1 This proof of evidence sets out the relevant town planning case for the CPO and is arranged as follows:

2. Summary Position
3. Relevant Planning Applications
4. Policy context
5. Consultation and Engagement
6. The Scheme’s contribution to the economic, social and environmental well-being of the Council’s area
7. Response to Objections
8. Conclusion

2 Summary Position

2.1 Meridian Water

- 2.1.1 The Scheme and the SIW (forming an essential element of the Scheme) are described in the Council's Statement of Reasons and Statement on Case as well as in greater detail in the evidence of Messrs Peter George and Matthew Bodley respectively.
- 2.1.2 The Scheme is supported by extensive and on-going masterplanning work. The Council has also commenced work on a Meridian Water Supplementary Planning Document (SPD). The purpose of the SPD is to bring forward development proposals for residential, commercial and other uses by providing further planning and design guidance in compliance with the Edmonton Leaside Area Action Plan (ELAAP).
- 2.1.3 The SIW are key to the future development of the West Bank and the implementation of ELAAP. The SPD will not have development plan status as such, but will be a material consideration in the determination of planning applications within the SPD area, and it will align with Local Plan documents including the Core Strategy and ELAAP, and the London Plan as appropriate. The SPD is scheduled to be consulted on later this year and adopted in Spring 2022.
- 2.1.4 The following paragraphs of my Proof of Evidence briefly describe:
- The Order Land;
 - The New Rights that are required over other land to undertake the SIW and allow for future maintenance and
 - The Position as to Planning Permission.

2.2 Order Land

- 2.2.1 LBE is seeking to compulsorily acquire the land (coloured pink on the accompanying plans (Core Document 2) and rights over land (coloured blue) pursuant to sections 226 (1)(a) and 226 (3)(a) of the Town and Country Planning Act 1990 (the 1990 Act) and section 13 of the Local Government (Miscellaneous Provisions) Act 1976 (the 1976 Act). The Council is the local planning authority and local highway authority for the Order Land.
- 2.2.2 The Order Land comprises a total of 124 plots over which the Council is seeking powers of compulsory acquisition and the compulsory creation of new rights in land.
- 2.2.3 Approximately 72% of the Order Land is already in the ownership of the Council including Zone 1, Zone 2 (part), Zone 4, Zone 5, and large parts of Zones 6 and 7 to the east of the Canal (Core Document 7).
- 2.2.4 The Council has reached voluntary agreement with other parties and is continuing in its attempts to acquire the remaining interests by agreement. In order to deliver the SIW, it is essential that all of the remaining third-party land interests, including any unknown interests, are brought into single ownership and all necessary rights are secured.
- 2.2.5 On 6 September 2016, the Council's Cabinet resolved that it was willing in-principle to use compulsory purchase powers, if necessary, across the entire Meridian Water area to bring forward the regeneration.
- 2.2.6 On 22 January 2020 the Cabinet resolved to use compulsory purchase powers to acquire the Order Land and:
- delegate authority to the Programme Director of Meridian Water in consultation with the Acting Executive Director of Resources and Director of Law and Governance to make the Order; and
 - delegate authority to the Executive Director of Place in consultation with the Director of Law and Governance and the power to effect all subsequent activities for the Order.

2.3 New Rights

- 2.3.1 In addition to the acquisition of land included in the Order new rights are required over other land to undertake the SIW and allow for future

maintenance. The land over which new rights are sought is shown coloured blue on the Order Map and is discussed in more detail in the evidence of Messrs Mike Savage and Joe Nunan.

2.3.2 A summary of the rights required and why they are needed is set out below:

- i) access needed in order to construct the SIW;
- ii) temporary construction roads;
- iii) construction compounds;
- iv) crane oversailing;
- v) rights to improve, re-grade, resurface and landscape land;
- vi) rights to alter the route of existing pedestrian and vehicular access ways;
- vii) rights to construct/improve/maintain parts of rivers and canals;
- viii) rights to construct bridges to accommodate carriageways built to adoptable standards and to use and maintain bridges for the purposes of pedestrian and vehicular traffic; and
- ix) rights to discharge into watercourses.

2.3.3 Some of the rights listed above are required only during the construction of the Development. At this time the Council does not have legal powers to seek temporary possession of land (until the provisions of the Neighbourhood Planning Act 2017, Part 1 Chapter 2 are brought into force), and as such it must acquire these rights permanently through the Order. However, the Council is content, on completion of construction of the SIW, to enter into the necessary agreements with the relevant landowners to relinquish those rights other than where on-going maintenance, use of constructed works or rights to discharge to watercourses are required.

2.4 Planning Position

2.4.1 The Council is promoting the Order to enable the Council to acquire land and rights over land compulsorily, in order to be able to undertake the SIW in connection with the wider Scheme.

2.4.2 Planning permission has been granted for the SIW, and the decision notice was issued on 22 July 2020 (the SIW Planning Permission. The SIW Planning Permission having been granted, the requirement to

obtain planning consent does not represent a procedural impediment to the delivery of the development that is subject to the Order.

- 2.4.3 The SIW are intended to facilitate the delivery of the Scheme more generally. In this regard planning permission has also already been granted for Phase One (ref: 16/01197/RE3). Further, the Council has already made a resolution to grant (24 March 2020 and again on 11 March 2021) in relation to the delivery of Phase Two and I see no reason why planning permission would not be forthcoming for Phase Two given that the planning policy framework is extremely supportive of the proposals.

3 Relevant Planning Applications

3.1 Introduction

3.1.1 This section of evidence discusses the:

- i) Planning permission granted for the SIW
- ii) Planning permission granted for Phase One
- iii) Resolution to grant Planning permission for Phase Two and
- iv) Other relevant planning permissions and planning applications.

3.2 Planning permission granted for SIW

Meridian Water Strategic Infrastructure Works - 19/02717/RE3 - Granted (22 July 2020) with conditions

3.2.1 The SIW Planning Permission was granted, subject to conditions, on 22 July 2020 (Core Document 30) with the following description of development:

"Full application for the redevelopment of the site to provide infrastructure works for the delivery of a mixed-use development comprising construction of an east-west link road between Glover Drive and Harbet Road (the Central Spine); alteration of access road between Argon Road and Glover Drive, construction of a link road between Leaside Road and the Central Spine, pedestrian and cycleway improvements to Glover Drive and Leaside Road, the construction of 4 no. bridges across the Pymmes and Salmon Brooks and River Lee Navigation; alteration to the Pymmes Brook channel, associated landscaping and formation of new public open space. Enabling works, comprising earthworks; remediation; flood conveyance channel, flood alleviation, outfall and new public open space works; utilities infrastructure; demolition of existing buildings, formation of new access's and associated works."

3.2.2 In summary, the SIW comprise (Core Document 9) the following elements:

- i) The Central Spine Road - a new tree-lined east-west boulevard connecting to Glover Drive and new Meridian Water Station in the

west, crossing the Pymmes and Salmons Brook and River Lee Navigation (the Canal) to Harbet Road in the east;

- ii) Leaside Link Road - a new link road providing access for cars, pedestrians and cyclists from Leaside Road through to the Central Spine Road;
- iii) Bridges (x4) - erection of bridges and associated works to enable the Central Spine Road and Leaside Link Road to span the Pymmes and Salmons Brook and River Lee Navigation;
- iv) Brooks Park and River Naturalisation - naturalising the channelised Pymmes Brook to introduce an ecological river landscape, as well as providing riverside parkland;
- v) Edmonton Marshes and Flood Alleviation Works - re-levelling and remediation of land to the east of Harbet Road, providing comprehensive flood alleviation works and a new high quality public open space within the Lee Valley Regional Park ('LVRP').
- vi) Access Works - third party access works to provide new and altered accesses to the IKEA store, a new north-south link between Argon Road and Glover Drive, the creation of a link between the Central Spine Road and Anthony Way and other improvements to maintain access, along with other ancillary highway works to Glover Drive, Leaside Road and Meridian Way.
- vii) Earthworks, Remediation, Utilities and other ancillary works - earthworks, retaining structures and remediation within Development Zones 4 and 5, installation of main utility networks and ancillary works including the demolition of existing buildings and structures.

3.3 Planning permission granted for Phase One

Meridian Water Phase One (Phase One / Meridian 1) - 16/01197/RE3 - Granted (10 July 2017) subject to S106 Agreement and conditions

- 3.3.1 The development site for Phase One of Meridian Water (also known as 'Meridian One') extends to approximately 8 hectares of land and comprises the former gas holder site on Willoughby Lane on the west side of the railway line, part of the site known as the 'tear drop' site Meridian Way (on the east side of the railway line) and much of the intervening railway land and sidings.
- 3.3.2 Phase One comprises up to 725 residential units, new station building, platforms and associated interchange and drop-off facilities including a pedestrian link across the railway, a maximum of 950 sqm retail

(A1/A2/A3), floorspace, a maximum of 600 sqm of community (D1) floorspace, a maximum of 750 sqm of leisure (D2) floorspace, associated site infrastructure works including ground and remediation works, roads, cycle-ways and footpaths, utility works above and below ground, surface water drainage works, energy centre and associated plant, public open space and children's play areas, and various temporary meantime uses without structures (landscaping and open space).

- 3.3.3 At the time when the Phase One planning application was determined, regional and local policy was supportive of the delivery of a new community at Meridian Water, which was designated as a major regeneration area. The application related to the first phase of the planned development which, would bring forward much needed new high-quality housing, and would prove central to helping to achieve the Council's aspirations for the wider area. Overall, it was considered that the development would provide a high-quality residential development that would kick-start the regeneration of the wider area.
- 3.3.4 The Meridian Water Station consented by this permission has now been completed. It opened in summer 2019 and will serve up to four million passengers each year at its peak.
- 3.3.5 For Phase One, the Council selected Vistry Partnerships (formerly Galliford Try Partnerships prior to its merger with Bovis Homes) as its development partner in April 2019 following a complete procurement process.
- 3.3.6 Phase One is subject to two separate applications. A Reserved Matters application in line with the existing Outline Planning Permission for 300 homes known as Phase 1A is currently being determined and set to be referred to planning committee shortly. A new planning application is then due to be submitted later in 2021 with respect to Phase 1B for circa 600-700 homes and all of the non-residential uses.

3.4 Resolution to Grant planning permission for Phase Two

Meridian Water 'Phase Two' - 19/02718/RE3 - Resolution to Grant (24 March 2020 and 11 March 2021) subject to GLA Referral, completion of the S106 and conditions

- 3.4.1 The outline planning application for Phase Two (the 'Phase Two Planning Application') was submitted in parallel with the SIW Planning Application. Whilst the Phase Two proposals are a standalone application, they were considered in the context of the Scheme, including the consented Phase One development, and the related approved SIW.
- 3.4.2 As noted above, Phase Two will secure the delivery of a residential led, mixed use development to include workspace, retail, a new primary school, purpose-built student accommodation and/or large scale purpose built shared living, a hotel and open spaces including a new park. The documents submitted with the Phase Two Planning Application propose up to 2,300 residential units (Class C3), Purpose Built Student Accommodation and/or Large-Scale Purpose-Built Shared Living (Up to 18,000 sq m - Sui Generis); a hotel (Up to 16,000 sq m - Class C1), commercial development (Up to 26,500 sq m - Class B1a,b,c); retail (Up to 2,000 sq m - Class A1 and/or A2 and/or A3 and/or A4), social infrastructure (Up to 5,500 sq m - Class D1 and/or D2), a primary school up to three forms of entry, hard and soft landscaping, new public open spaces including equipped areas for play, sustainable drainage systems, car parking provision, and formation of new pedestrian and vehicular access (Outline- all matters reserved).
- 3.4.3 Since the 'resolution to grant' in March 2020 the applicant has been working with officers on agreeing the final wording of conditions, the Design Code and the draft S106 Agreement. A further report was subsequently taken to Planning Committee on 11 March 2021 (Core Document 33) to update Members on the these matters as well as to report a change to the baseline level of affordable housing being referenced in the draft S106 Agreement, arising from discussions with the Greater London Authority on the obligations within that agreement.

- 3.4.4 In reporting the application to Planning Committee in March 2020, officers advised that the application sought the provision of 43% affordable housing by habitable room and 40% affordable housing by unit number. However, this level of provision was dependent on grant, and the financial viability statement (FVA) submitted alongside the application confirmed that the maximum amount deliverable without grant was 28% by unit. Nevertheless, the proposal was to proceed on the basis of grant, so that the draft S106 Agreement set the 40/43% figure as the baseline affordable housing threshold.
- 3.4.5 It was on this basis that the draft S106 was initially drafted and shared with the Greater London Authority ('GLA'), with an obligation within to deliver 40/43% affordable housing with grant, as agreed, and provisions for a review mechanism.
- 3.4.6 However, since the Phase Two Planning Application was originally reported to Members, the GLA has determined that future affordable housing grant funding will be provided under the new Homes for Londoners: Affordable Homes Programme 2021-2026. This programme and its associated guidance were launched in November 2020. A key element of this new funding programme is the focus on net additional affordable home provision, one element of which is a bar on funding for any affordable housing mandated within s106 Legal Agreements.
- 3.4.7 On this basis if a 40/43% affordable housing level were stipulated within the s106, the GLA would not have been able to provide grant funding to enable the gap between the 28% (viable) and 40/43% (target) positions to be bridged.
- 3.4.8 The draft S106 therefore allows flexibility for the delivery of affordable housing across the development (some phases may provide more and some less) but with an absolute requirement that at no stage shall the level of provision be below 28%/31%. Further, it allows the Council to pursue grant funding in order to deliver the targeted provision of 40%/43%.
- 3.4.9 This approach to viability is agreed with the GLA.
- 3.4.10 The case officer reported this update to Members of the Planning Committee on 11 March 2021. It was the officer's view that the development was acceptable and therefore the recommendation

remained, subject to the referral of the application to the GLA, to grant planning permission subject to conditions and a draft S106 Agreement, to be appended to the decision notice. Members noted the updates set out in the officer's report and resolved to grant planning permission subject to the recommendations set out above.

3.4.11 The applicant and the local planning authority ('LPA') will now complete a S106 Agreement. The obligations will relate to a number of matters including transport, highway works, employment and skills, affordable housing etc.

3.4.12 Amongst the various obligations is the requirement to provide suitable alternative natural green ('SANG') space which accords with the criteria set out in the Draft SANG Management Plan (submitted with the Phase Two application). The SANG space is identified as 'Edmonton Marshes' (Core Document 9) and provides alternative recreational land to discourage new residents of development schemes from accessing the Epping Forest Special Protection Area. The S106 will require, prior to the occupation of Phase Two, the submission and approval of a SANG Management plan for the ongoing maintenance of the SANG including the details of the body or bodies to take future maintenance responsibility of the SANG along with details of the constitution governance structure and funding of that body.

3.4.13 Having regard to the above matters, there is no reason to believe that planning permission will not be forthcoming in a timely manner.

3.4.14 Separately, the implementation and phased delivery of the SIW and Phase Two is considered in detail by Stephen Armitage in his proof of evidence.

3.5 Other relevant planning permissions / applications

Ikea West Car Park - 20/00111/RE4 - Granted 18 June 2020 with conditions

3.5.1 The application site is located to the east of Meridian Way, off Glover Drive and comprises hardstanding that accommodates car parking spaces for IKEA.

- 3.5.2 This application was submitted in response to concerns raised by IKEA to the SIW and Phase Two application regarding their impact on the operation of the store. It was recognised that there would be an impact on the IKEA Store's operation from the severance from the main store of the existing northern car park by the proposed new Central Spine Road.
- 3.5.3 The application proposed the relocation of 393 parking spaces - see Plan 260637-T-SK-02 Rev C in Appendix A1 - from the existing northern car park and store front to the existing hard standing areas to the west and south of the store together with hard and soft landscaping and associated works (the 'IKEA West Car Park'). The application was granted planning permission by the Council on 18 June 2020.
- 3.5.4 The existing northern IKEA car park will be closed and parking spaces removed from the front of the store. New parking spaces will be sited to the south and west of the existing Ikea store with the remainder of the car parking spaces in the undercroft under the store remaining.
- 3.5.5 In approving the application, Members took into account a number of matters including:
- The proposed relocation of the car park would facilitate delivery of the SIW and therefore support the major regeneration proposals in the area.
 - There would be a net reduction in car parking spaces by a total of 19 car parking spaces and
 - The proposal would continue to meet the operational needs of IKEA and would not impact on the vitality and viability of the IKEA Store.

3.5.6 In addition to various pre-commencement and compliance conditions, the planning permission confirms that the IKEA West Car Park shall not come in to use until the existing northern car park is closed and measures to prevent public access implemented. There is no reason to believe that these conditions cannot be discharged in a timely manner.

Land Opposite 1A and 1 B Towpath Road - 20/00112/RE4 - Granted 23 July 2020 with conditions (the Flood Barrier Permission)

3.5.7 This application is relevant since flood modelling for the SIW indicates that the flood water displacement and compensation measures proposed in the SIW would result in a small increase in flood level south of the proposed Central Spine Road. This results in slightly increased flood depths on Towpath Road.

3.5.8 Therefore, to mitigate flood risk, the application –sought planning permission for a flood barrier extending approximately 170m south of the central spine road to a level of 10.95m.

3.5.9 The application for the installation of a low-level flood restraint barrier adjacent to Towpath Road - see Flood Restraint Barrier - MWP2-ARP-XX-XX-SK-CF-00004_REV02 in Appendix A2 - was granted consent on 23 July 2020. Members agreed that:

- The proposals would mitigate the increase in flood risk
- The mitigation measures had been detailed within the flood risk assessment for the SIW and
- The proposal would not impact on visual amenity within the street scene or neighbouring residential amenity.

- 3.5.10 The Flood Barrier Planning permission was granted subject to a number of pre commencement conditions. The permission requires the Flood Conveyance Channel - approved under the SIW Planning Permission - to have been completed prior to works commencing. I do not consider that the submission - and the determination - of further details to discharge the pre-commencement conditions will delay the delivery of the consented proposals.

2 Anthony Way - 19/03044/RE4 - Granted (19 December 2019) with conditions

- 3.5.11 Whilst not forming part of the SIW, this application is relevant since the permitted works relate to a building that currently accommodates a membership based 'maker space' (known as 'Building Bloqs') situated on the Order Land, where 300 members have access to large scale machinery to make and produce everything from art and furniture to face masks.
- 3.5.12 The site is adjacent to the SIW on the west bank of the Canal, with the approved works due to be completed prior to the SIW commencing. The Council is working with Bloqs to grow their business which will relocate into new premises, upgrading from a floor space of 1,000 sq metres to 3,000 sq. metres. This will give access to more small businesses and individual makers and advance the economic regeneration of this part of the Lee Valley, refurbishing and bringing a redundant former vehicle testing station back into productive use.
- 3.5.13 The application proposed refurbishment and alterations to a former vehicle testing building to provide light industrial workshop space and ancillary accommodation, including new cafe, erection of a new light industrial workshop building and link volume, roof canopy, with associated service yard, parking, storage area, and landscaping.
- 3.5.14 Work has already commenced on the new 'BloQs' workshop to provide 30,000sq feet of workspace and support up to 1,000 makers and creators across a range of departments - engineering, wood, metal, digital and additive technology, paint finishing, and a fashion studio.

Leaside Road improvement works - Section 8 and Section 278 Agreement with London Borough of Haringey

3.5.15 Works on the public highway, including junction and streetscape improvements will be required to deliver the Development and these will be agreed through Section 8 and Section 278 agreements with the local highway authorities. There is no reason to believe that agreements will not be reached. Further matters in relation to these works are discussed in the Proof of Evidence of Mike Savage.

4 Policy Context

4.1 Introduction

- 4.1.1 Compulsory purchase guidance (the ‘Guidance’), provided by the Ministry of Housing, Communities and Local Government (MHCLG), provides that authorities should demonstrate that proposals are consistent with planning policy. Notwithstanding that planning permission has already been granted for the SIW, I address at a high level the compliance of the development with policy at a national, regional and local level.
- 4.1.2 A more detailed analysis of the SIW and Phase Two against planning policy is set out in Appendix A3 of my proof of evidence.

4.2 The Development Plan

- 4.2.1 Section 70(2) of the 1990 Act and Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) require that planning applications should be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 4.2.2 The National Planning Policy Framework (‘NPPF’) (published February 2019) reconfirms the statutory requirement set out in Section 38(6) relating to the determination of planning applications and also confirms that the NPPF should be taken into account as a material planning consideration in planning decisions (paragraphs 2 and 212).
- 4.2.3 Section 38(2) of the Planning and Compulsory Purchase Act 2004 (as amended) defines the Development Plan for any area of Greater London as:
- i) the Spatial development strategy;
 - ii) the Development Plan documents (taken as a whole) which have been adopted or approved in relation to that area; and
 - iii) the neighbourhood development plans which have been made in relation to that area.

- 4.2.4 In the present instance, the current adopted Development Plan for the Council's area, against which the SIW and the Scheme (of which Phase Two forms part thereof) fall to be judged comprises:
- i) The New London Plan adopted 02 March 2021 (the 'London Plan');
 - ii) LB Enfield Core Strategy adopted November 2010 ('Core Strategy')
 - iii) Edmonton Leaside Area Action Plan ('ELAAP') – adopted January 2020
 - iv) LB Enfield Development Management Document Development Plan Document adopted Nov 2014 ('Development Management Document' or 'DMD').
- 4.2.5 Paragraph 48 of the NPPF states that weight may be given to planning policies in emerging plans according to their stage of preparation; i.e. the more advanced its preparation, the greater the weight that may be given. The following planning policy documents are in the process of being prepared:
- the Draft Enfield New Local Plan 2036 (Issues and Options) published December 2018 for Regulation 18 public consultation.

- 4.2.6 The Draft Enfield New Local Plan 2036 is at a very early stage of its preparation and therefore carries less weight in decision making but will accrue greater weight as it progresses through the preparation process.

4.3 National Planning Policy Framework

- 4.3.1 Although not part of the statutory Development Plan, the NPPF (Core Document 15) sets out government's planning policy and how it is expected to be applied. The NPPF covers matters such as sustainable development, promoting sustainable transport, making the most effective use of land, meeting the challenge of climate change and conserving and enhancing the natural environment. I briefly assess the SIW and Phase Two against the NPPF below.

The SIW

- 4.3.2 In summary:
- i) Section 2 – Achieving sustainable development

The SIW support not only sustainable modes of transport in an area of significant planned growth but also secure net gains across the economic, social and environmental objectives of sustainable development enshrined in the NPPF. In this respect the SIW is considered to address the requirements of policy.

ii) Section 6 – Building a strong, competitive economy

I consider that the SIW accords with the NPPF as in addition to supporting the delivery of much-needed housing, the SIW enables the delivery of a new mixed-use neighbourhood comprising a new local centre and modern workspace suited to the needs of the modern economy.

iii) Section 9: Promoting sustainable transport

I consider that the transport and highway interventions have been informed by placemaking considerations as part of the site-wide masterplanning process in accordance with the principles set out in paragraph 102 of the NPPF. The Transport Assessment (TA) (submitted with the SIW Planning Application) demonstrated that the transport impacts associated with the SIW, with proposed mitigation, were acceptable. .

iv) Section 11 – Making effective use of land

The SIW includes a comprehensive package of works to address development on this significant brownfield site and I consider that the SIW accord with the NPPF.

v) Section 12 – Achieving well-designed places

Given the master planned approach to development I consider the SIW conform with the NPPF.

vi) Section 13 – Protecting Green Belt

The SIW includes flood alleviation works, earthworks and landscaping within the LVRP, which is designated Metropolitan Green Belt land. As these works comprise engineering works, I do not consider that they constitute inappropriate development in the Green Belt.

vii) Section 14 - Meeting the challenge of climate change, flooding and coastal change

The Flood Risk Assessment (FRA) accompanying the SIW Planning Application demonstrates that the SIW will provide wider sustainability benefits to the community that outweigh the flood risk. The SIW conform with government policy on meeting the challenge of climate change and flooding.

viii) Section 15 – Conserving and enhancing the natural environment

The SIW will result in a significant biodiversity net gain, reflecting the multiple benefits of the proposed natural flood management

approach to increasing flood alleviation storage and infrastructure and associated habitat for a range of plant and animal species. I therefore consider that the SIW complies with the relevant ecology and natural environment provisions of the NPPF

Phase Two

- 4.3.3 More generally in relation to the Phase Two proposals, which will be facilitated by the SIW:

Sustainable Development

- 4.3.4 The presumption in favour of sustainable development is at the heart of the NPPF. I consider that the mixed-use nature of Phase Two creates a sustainable new neighbourhood, in order to minimise distances between employment opportunities, services and public transport and support active modes of travel. The Council agreed with this assessment.

Housing Delivery

- 4.3.5 The NPPF outlines the Government's commitment of significantly boosting the supply of homes and supporting economic growth.
- 4.3.6 I consider that the housing provision – in Phase Two alone but also as part of the wider Scheme - accords with the NPPF as it will significantly boost local housing supply (thereby helping to address the Council's historical under delivery of housing) and contribute to the creation of a mixed and balanced community at Meridian Water.
- 4.3.7 In terms of housing delivery, in 2020 Enfield failed to meet 75% of their housing targets in the preceding three years. As a consequence, the "presumption in favour of sustainable development" is triggered because of the Council failing to meet the 'Housing Delivery Test' (HDT) – the HDT being an annual measurement of housing delivery introduced by the government through the NPPF. The Council is updating its Housing Action Plan (2019) and is expected to be published shortly. The new Housing Action Plan, amongst other areas of action, will emphasise the role of council housebuilding and regeneration in delivering new homes. Lack of development in the borough means the Council has to take a proactive role in council housebuilding and assess the barriers to delivery. It is clear that the

delivery of Meridian Water provides the Borough with a significant opportunity for growth.

Transport

- 4.3.8 As set out in NPPF paragraph 109, development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 4.3.9 Phase Two embeds the Healthy Streets Approach into the design of the Scheme and included a Transport Assessment (TA) that demonstrates that the transport impacts associated with Phase Two, with proposed mitigation, are acceptable. Phase Two therefore accords with the NPPF.

Climate Change and Flooding

- 4.3.10 As set out above, the NPPF seeks to address the challenge of climate change and flooding. The FRA, submitted with Phase Two, demonstrates how the proposals meet the requirements of the Sequential and Exception Tests with the flood mitigation strategy for Phase Two including raising ground levels within the application site and conveying flood water to the Pymmes Brook and also the LVRP by the flood conveyance channel to come forward under the SIW. I consider Phase Two accords with this chapter of the NPPF.

Natural Environment

- 4.3.11 The NPPF seeks to conserve and enhance the natural environment. Phase Two includes a new 2ha park known as Brooks Park, 0.79ha public open space comprising of riverside linear open space (0.34ha); Salmons Brook linear open space (0.14ha); riverside square (0.1ha) and community streets (0.21ha) alongside smaller communal open spaces within urban squares. Naturalising the channelised Pymmes Brook to introduce an ecological river landscape will include moving a section of river from its current concreted lined bed to a new naturally lined channel which will meander through the park surround by parklands and a boardwalk. The river will then re-join the existing concrete lined channel in the south and north of the naturalisation area. Green infrastructure will also be provided across the site through rain gardens, soft landscaped filter strips and ponds.

- 4.3.12 Phase Two – as part of the wider Scheme - has been designed to avoid and minimise ecological impacts, mitigate effects where necessary and provide ecological enhancements and accords with NPPF principles.

Conclusion

- 4.3.13 With regards to the NPPF, the document emphasises that the purpose of the planning system is to contribute to the achievement of sustainable development; that there are three dimensions to sustainable development: economic, social and environmental; and that planning authorities should seek opportunities to achieve the promotion of these dimensions through the application of its policies. The NPPF encourages the use of sustainable and non-car modes of travel.
- 4.3.14 I consider that the SIW and Phase Two (also being integral to the delivery of the wider Scheme) are in accordance with the NPPF and secure net gains across the economic, social and environmental objectives of sustainable development enshrined in the NPPF. This is confirmed by planning permission having been granted for the SIW and the 11 March 2021 resolution to grant planning permission for Phase Two.

4.4 The Development Plan

The London Plan

- 4.4.1 The London Plan was adopted on 02 March 2021 (Core Document 19). It provides the strategic spatial strategy within Greater London and forms part of the Council's Development Plan. The London Plan identifies a number of objectives, to: optimise the potential of development sites; make the most sustainable and efficient use of land, particularly in areas of good public transport; improve the quality of life; deliver high quality new homes; mitigate and adapt to climate change; and secure a more attractive, well designed green city.
- 4.4.2 Whilst the planning statements accompanying the SIW and Phase Two applications provided a detailed assessment of the proposals against (the then) Draft New London Plan policies and the case officer reports assessed both applications against the Intend to Publish

London Plan policies I touch on substantive changes (as the majority of them remain unaffected) that have been made to relevant London Plan policies.

4.4.3 The London Plan (para 1.4.3) identifies the need to provide an annual average of 66,000 homes across the capital each year. The minimum delivery target set for Enfield in the London Plan in Table 4.1 is 12,460 net housing completions 2019/20 – 2028/29 with Meridian Water playing a key role in contributing to this. Policy SD1 Opportunity Areas (OA) refers to areas capable of accommodating substantial numbers of new homes and employment. It is clear that a significant number of homes are needed in Enfield over the coming years in order to meet current and future need.

4.4.4 Relevant London Plan policy changes include:

i) Policy D3 - Optimising site capacity through the design-led approach.

A additional text added to require the promotion of higher density development in locations well connected to jobs, services, infrastructure and amenities by public transport , walking and cycling and in other areas, incremental densification should be actively encouraged by Boroughs to achieve a change in densities in the most appropriate way.

ii) Policy E4 - Land for industry, logistics and services to support London's economic function.

The policy originally required that there should be no net loss of industrial floorspace capacity (and operational yard space capacity) within designated SIL and LSIS. This text has been removed from the policy. The requirement remains that any release of industrial land in order to manage issues of long term vacancy and to achieve wider planning objectives, including the delivery of strategic infrastructure, should be facilitated through the processes of industrial intensification, co-location and substitution and supported by Policy E5 Strategic Industrial Locations (SIL). Table 6.2 that sat alongside this policy and identified whether each London Borough had capacity to release industrial land, was required to retain its industrial land capacity,

or as in Enfield's case was identified to 'provide capacity' has been deleted.

iii) Policy E5 Strategic Industrial Locations ('SIL').

Text added around the process for release or substitution of SIL

iv) Policy G2 London's Green Belt

Text added to bring in line with NPPF. The presumption against de-designation of Green Belt has been removed and replaced with text that states, "exceptional circumstances are required to justify either the extension or de-designation of the Green Belt through the preparation or review of a Local Plan".

- 4.4.5 In summary these changes have no material effect upon the assessment of the SIW and Phase Two Planning Applications. All matters were fully considered at the time of application determinations. The SIW remain in line with London Plan policy and support strategic growth aspirations for the site. Phase Two will also make a significant contribution to increased housing supply within LBE in accordance with London Plan policy

Upper Lee Valley Opportunity Area Planning Framework

- 4.4.6 The Development is situated within the Upper Lee Valley Opportunity Area with the London Plan recognising that the area provides a range of development opportunities for higher density development.
- 4.4.7 The Upper Lee Valley Opportunity Area Planning Framework ('ULVOAPF') (Core Document 20) was adopted by the Mayor as Supplementary Planning Guidance in July 2013 and identifies growth at Meridian Water as one of the eight key objectives of the OAPF. I consider that the SIW and Phase Two are in accordance with the objectives of the ULVOAPF.

The Enfield Plan: Core Strategy 2010-2020

- 4.4.8 The Core Strategy 2010-20 (Core Document 16) provides the overarching policy context for the borough and the DMD sets out

detailed policies and standards against which planning applications will be assessed. Both documents provide policies of relevance to the SIW and Phase Two.

- 4.4.9 As set out in the Planning Committee reports and in the Planning Statements submitted with the SIW and Phase Two applications, both applications were considered to meet a range of objectives for Meridian Water and to be in accordance with relevant Core Strategy policy. I agree that both the SIW, Phase Two and indeed Scheme more generally are all in accordance with the Core Strategy. As noted above, I provide relevant analysis on a ‘policy by policy’ basis in Appendix A3.

The Edmonton Leaside Area Action Plan (‘ELAAP’)

- 4.4.10 The ELAAP was first produced in November 2013 and adopted in its revised format in January 2020 (Core Document 17). The primary purpose of the ELAAP is to articulate in greater detail how the Core Strategy and relevant Development Management Document policies will be implemented, and to provide a more detailed policy framework to guide new development in the area. The ELAAP provides a policy basis supported by evidence modelling, to achieve the Core Strategy aim of approximately 5,000 homes and 1,500 net full-time jobs at Meridian Water.
- 4.4.11 Both the SIW and Phase Two are in compliance with the ELAAP. The Scheme will also bring forward other housing, retail, leisure uses and provide new educational, health and community facilities in accordance with the ELAAP. Again, I provide relevant analysis on a ‘policy by policy’ basis in Appendix A3

4.5 The Draft Enfield New Local Plan – Issues and Options – Initial Consultation (Regulation 18)

- 4.5.1 The Council published its Draft Enfield New Local Plan (Issues and Options) 2018 – 2036 for Initial consultation (Regulation 18) consultation during the period 5 December 2018 and 28 February 2019 (Core Document 18). In the lead up to adoption of its new Local Plan the Council is expected to follow the below indicative timetable:
- i) Draft Plan (Regulation 18) Summer 2021

- ii) Publication of proposed submission plan (Regulation 19) Summer 2022
- iii) Submission (Regulation 22) Autumn 2022
- iv) Examination (Regulations 23-25) Autumn 2022 through to end 2023
- v) Adoption (Regulation 26) Early 2024

4.5.2 Considering that consultation feedback on the Regulation 18 version of the Draft Enfield New Local Plan (Issues and Options) has not yet been taken into account and has not yet been subject to EIP, its policies should be afforded very limited weight in comparison to the adopted Development Plan and I do not therefore address it further.

4.6 Conclusion

4.6.1 I have considered both the SIW and Phase Two (as part of the Scheme) in relation to both national policy and the adopted development plan (including both London and Borough planning policies). The detailed issues relating to design, traffic impact, access, flood risk, contamination and remediation, open space, ecology and other environmental matters have also been tested and assessed through the planning application process.

4.6.2 The SIW Planning Permission has been granted, and there exists a resolution to grant planning permission for Phase Two made on 11 March 2021. However, I can further confirm that the SIW, Phase Two and the wider Meridian Water Scheme all comply with planning policy.

5 Consultation and Engagement

5.1 Introduction

5.1.1 This section of my Proof of Evidence outlines the main consultation and engagement exercises which have been undertaken to inform the Development and provides an overview of:

- i) Consultation on Policy
- ii) Consultation with the LPA
- iii) Consultee engagement
- iv) Consultation at pre-app stage (local business/residents) and
- v) How consultation feedback influenced the SIW

5.2 Consultation on Policy

ELAAP

5.2.1 As noted above, the ELAAP provides a framework for the future for Edmonton Leaside, one of London's most significant regeneration opportunities. The ELAAP notes the area as being strategically located at the heart of the Mayor's Upper Lee Valley Opportunity Area and the London-Stansted corridor and long established as a significant employment location with some parts of the area seeing transformational change, in particular at Meridian Water.

5.2.2 The process for producing the Edmonton Leaside AAP began in 2007, with several stages of consultation to develop the plan with local people and interested organisations.

5.2.3 Various issues were raised by those making representations at the Regulation 18 and Regulation 19 stages including the proposed east-west connection – known at that time as the Causeway and now more commonly known as the Central Spine Road. Evidence advanced at the Examination in Public (EiP) in October 2018 by the Council and objectors included whether the ELAAP made adequate provision for east west movement by public transport / bus routes through the site and how would it be supported was considered.

5.2.4 The Inspector's Report on the ELAAP concluded that "Taking into account the role the route (Central Spine Road) will play in facilitating

the redevelopment of Meridian Water and the wider ELAAP, it is important that development proposals within the identified corridor are designed to support the function of the Central Spine. It should also be used as a route for servicing and infrastructure. Whilst the road should make provision for cycle routes, these should take account of the needs of existing businesses. These measures, as set out in MM6 are reasonable and necessary (my emphasis).'

5.2.5 The ELAAP was adopted in January 2020.

5.2.6 The SIW proposals reflect the aspirations, policies and proposals that have been consulted on in the preparation of the ELAAP, including policies related to the provision of transport infrastructure (Policy EL6), rail and bus improvements (Policy EL7), managing flood risk at Meridian Water (Policy EL8) and leisure facilities and open space at Meridian Water (Policy EL9).

5.3 Consultation with the LPA

5.3.1 During the pre-application period, there was on-going regular consultation with LPA officers in order to inform the design of the SIW (and suite of application documents) in conjunction with the parallel Phase Two planning application. This included the following activities:

- Submission of an Environmental Impact Assessment Scoping Opinion request in December 2018 and receipt of the response from the Council in February 2019;
- Entering into a Planning Performance Agreement with the Local Planning Authority to shape the pre-application process;
- Workshops with the Enfield Place and Design Quality Review Panel between October 2018 – May 2019, which informed the concept and detailed design of the proposed SIW.

5.3.2 In addition to the regular LPA officer meetings as per the PPA, the following provides a summary of other LPA officer meetings:

Consultee	Engagement	Feedback on technical design
LB Enfield Environmental Health	7 February 2019	LB Enfield Environmental Health advised on the proposed scope of the ground investigation and the ground conditions and contamination chapter of the Environmental Statement.

LB Enfield Local Education Authority	21 September 2018 14 February 2019	Topics discussed included child yield, capacity of existing local primary and secondary schools, proposed approach to on-site and off-site education-related contributions.
LB Enfield Local Flood Authority	5 September 2018 19 March 2019	LB Enfield Local Flood Authority was involved in discussions with the Environment Agency and advised on drainage strategy for SIW and MWP2, as well as approach to watercourse naturalisation.
LB Enfield Local Highway Authority	5 July 2018 22 November 2018 6 May 2019	LB Enfield Highways advised on strategic and local transport modelling methodologies, specification of adoptable roads and bridges and identified potential transport-related planning obligations. Topics discussed included street design, car and cycle parking,
LB Haringey Local Highway Authority	20 August 2018 29 January 2019	Topics discussed included alterations to Leaside Road and junction at Meridian Way / Leaside Road and design of north-south cycle linkages between LB Enfield and LB Haringey.
LB Haringey Local Planning Authority	11 March 2019	Topics discussed included principle and scope of development, implications for highways including Section 8 (Highways Act 1980) agreement for Leaside Road works, access and development programme.

5.3.3 Council officers also provided briefings to its elected members on both the wider Meridian Water regeneration proposals and the specific proposals for the SIW and Phase Two.

5.3.4 The Planning Officer’s report on the SIW Planning Application noted that in preparing the SIW significant pre-application engagement was undertaken by the applicant, including with local business and the residential community, statutory and non-statutory consultees and the officers. Community consultation exercises were undertaken in April and May 2019. The SIW and Phase Two proposals were also taken through a series of Design Review Panels and developed to respond to the feedback received.

5.4 Consultee Engagement

5.4.1 In addition to the public consultation on the proposals, a number of topic specific meetings with technical stakeholders took place, including with the GLA and Transport for London (‘TfL’).

5.4.2 Engagement with consultees included (and as further summarised in the table below):

- i) Engagement with the Environment Agency (‘EA’) to agree an approach to addressing flood risk, ensuring compliance with the Water Framework Directive and agreeing the principles of the remediation strategy and works to the brooks;

- ii) Engagement with Natural England to agree an approach to undertaking an Appropriate Assessment in respect of recreational pressure on European Sites as required under the Conservation of Habitats and Species Regulations 2010;
- iii) Engagement with statutory undertakers including Thames Water, Cadent and UKPN in respect of proposed utilities infrastructure and diversions;
- iv) Engagement with the Lee Valley Regional Park Authority ('LVRPA') regarding works proposed in and adjacent to the LVRRP;
- v) Engagement with the Canal and River Trust ('CRT') in relation to works adjacent to and crossing the Canal;
- vi) Engagement with the operator of the Meridian Water Heat Network ('Energetik') in respect of the proposed design for the primary heat network;
- vii) Engagement with the Metropolitan Police Architectural Liaison Officer to ensure that the Proposed Development incorporates crime prevention principles;
- viii) Engagement with Historic England Greater London Archaeology Advisory Service;
- ix) Engagement with the GLA;
- x) Engagement with the Local Planning Authority for the neighbouring London Borough of Haringey ('LBH');
- xi) Engagement with the London Borough of Enfield Lead Local Flood Authority;
- xii) Engagement with the Local Highways Authorities for the Council and LBH, as well as TfL as part of a series of technical transport meetings to agree the scope of the Transport Assessment to support the full planning application in conjunction with the parallel Phase Two outline planning application.

Consultee	Engagement	Feedback on technical design
Cadent	8 November 2018	Topics discussed included existing capacity and future electricity demand arising from future development phases. Cadent advised that there is currently sufficient capacity in the existing gas distribution system to accommodate the proposed development.
Canal and River Trust	4 June 2018 8 November 2018	Topics discussed included bridge design and MWP2 development frontage onto the River Lee Navigation. CRT

		advised on bridge clearance, development setbacks and waterside lighting.
Enfield Place and Design Quality Panel	27 September 2018 5 October 2018 28 November 2018 28 February 2019 2 May 2019	Topics discussed included emerging masterplan, place vision, infrastructure design and integration with future development plots, architectural quality and materials, building heights, land use mix, public realm, green and blue infrastructure linkages, MWP2 Design Code and MWP2 parameter plans.
Environment Agency	5 September 2018 13 December 2018 14 February 2019	Topics discussed included proposed flood alleviation including scope and design of brooks naturalisation, approach to land remediation, ecological impact and flood modelling and impact. EA advised on remediation framework, and flood modelling methodology.
Energetik (Meridian Water Heat Network)	5 October 2018 22 November 2018 31 January 2019 8 March 2019	Topics discussed included specification and layout of the primary heat network to be delivered, scale and phasing of MWP2 and Energetik's business and delivery plan.
Lee Valley Regional Park Authority	29 November 2018	Topics discussed included proposed flood alleviation, land remediation and landscaping within the LVRP.
Metropolitan Police Designing Out Crime	7 March 2019	Topics discussed included defensible space principles for public and communal amenity space, public realm lighting, active frontages, interim boundary treatments and meanwhile uses for development plots and other urban design considerations.
National Grid	28 November 2018	National Grid advised that it has no objections to the proposed development, which is in close proximity to a High Voltage Transmission Overhead Line and underground cable.
Natural England	16 October 2018 8 April 2019	Topics discussed included provision of open amenity space, impact on ecology including European sites at Epping Forest and Walthamstow Marshes, operational and construction impacts of proposed development. Advised that a Habitats Regulation Assessment is undertaken to understand recreational impacts on European sites.
NHS Enfield Clinical Commissioning Group ('CCG') and NHS London Healthy Urban Development Unit ('HUDU')	13 February 2019 29 April 2019	Topics discussed included phasing and scale of proposed development, existing primary care provision and proposed on-site and off-site healthcare-related contributions. The CCG and HUDU advised on various healthcare needs arising from the proposed development.
Openreach	24 October 2018	Topics discussed included diversion of existing BT infrastructure, design of utilities corridors and potential options for servicing MWP2.
Sustrans	24 August 2018	Topics discussed included design of proposed pedestrian and cycle routes and connectivity to existing network, including National Cycle Route 1 and access considerations.
Thames Water Utilities Ltd. ('TWUL')	10 April 2018 7 September 2018 9 November 2018 23 November 2018 29 January 2019	Topics discussed included design of proposed earthworks, flood alleviation and utilities corridors, diversions, potable water and foul drainage demand arising from MWP2 and drainage strategy.

5.5 Consultation at pre-application stage (local business/residents)

5.5.1 Consultation and engagement with local businesses and residents included:

- i) Community engagement events held at Angel Community Centre on 23 April and 18 May 2019.
 - a. As well as exhibition boards focused on the proposals for improved infrastructure across Meridian Water and for Phase Two, there were exhibition boards focused on Meridian Water more generally, potential meanwhile uses and the new Meridian Water Station.
 - b. A number of large models, of the entire Meridian Water regeneration area and more specifically focused on Phase Two proposals, were displayed at these events.
 - c. There was also an explanatory booklet, Meridian Water.
 - d. These events were supplemented by a dedicated consultation website: www.meridianwaterconsultation.co.uk
 - e. In total, 211 local residents and other stakeholders attended these two consultation events.
 - f. Additionally, meetings were offered to key community groups and local councillors in both the Council and LBH.
 - g. The Residents of Edmonton Angel Community Together played an active part in the consultation process, and were present at both consultation events, held at the Angel Community Centre.
- ii) Engagement with Arriva Buses London, Anthony Way occupiers and landowners regarding the design of TPA1 to ensure that continuity of access is maintained through the construction and operation of the SIW.
- iii) On-going engagement with third party landowners – including IKEA, Tesco and CRT - as part of the land assembly process by voluntary treaty and in the preparation for making the Order.

5.6 How consultation feedback influenced the SIW

- 5.6.1 As summarised above, in developing the design for the SIW, technical consultation with local and strategic highways authorities (the Council, LBH, TfL), the EA, Natural England and CRT influenced the key design decisions. Additionally, existing businesses located off Anthony Way were consulted in order to ensure that the proposed works accommodated their continued effective operation.
- 5.6.2 The alignment and specification of key highway infrastructure, including footways and cycleways, were subject to pre-application engagement with the two local highways authorities to ensure a design that improved connections and enhanced the function of the masterplan area. Similarly, consideration of potential new or extended bus routes and the impact on existing bus depot operations was addressed with input from TfL. The design of the Central Spine Road and its interface with the existing Glover Drive alignment was also discussed extensively with Tesco and IKEA, in order to reflect their access requirements for their car parking and service yards.
- 5.6.3 The Central Spine Road final location was determined by the primary objectives of improving east-west connections for people and services, optimising public transport access, navigating the site's waterways and topography and dealing with the site's existing uses within the context of the long-term regeneration objectives.
- 5.6.4 The proposed flood alleviation including scope and design of Brooks Park and naturalisation, approach to land remediation, ecological considerations and flood risk mitigation were discussed in detail with the EA and informed design for proposals. For example, the ongoing design of the naturalisation of the Pymmes Brook has been subject to extensive design evaluation including input from the EA and the Council as Lead Local Flood Authority. Four naturalisation options (and an evaluation of these options) were presented to the EA for their view and this fed into the final optioneering.
- 5.6.5 The proposed design and landscaping of Edmonton Marshes was particularly informed by Natural England and its statutory duty in regard to the Habitat Regulations; the potential for Edmonton Marshes as a suitable alternative natural greenspace has been maximised in accordance with Natural England requirements.

5.6.6 Additionally, CRT specifically advised on their requirements for bridge clearance, setback distances for structures and waterside lighting. This informed the design of the bridges in the scheme such as the Canal bridge. The design of the bridge evolved in consultation with technical consultees to ensure accessibility for all, including ramped and stepped access, with a clearance that accommodates cyclists.

6 The Scheme's contribution to the economic, social, and environmental well-being of the Council's area

6.1 Introduction

- 6.1.1 This section of my Proof of Evidence demonstrates how the SIW (and Phase Two), as part of the Scheme, contribute to the achievement of the objectives specified in Section 226 (1A) of the 1990 Act.
- 6.1.2 Section 226 (1A) requires that development, re-development or improvement should contribute to the achievement of any one or more of:
- (a) the promotion or improvement of the economic well-being of their area;
 - (b) the promotion or improvement of the social well-being of their area;
 - (c) the promotion or improvement of the environmental well-being of their area.
- 6.1.3 Development on this scale represents a significant investment in a key strategic development site in the London Borough of Enfield, the benefits of which will be considerable and are summarised below in terms of economic, social and environmental wellbeing.

6.2 Economic well-being

- 6.2.1 The SIW will clearly contribute to the economic well-being of the Council's area by facilitating regeneration of Meridian Water. The main economic benefits include:
- i) a Scheme value of c.£6bn;
 - ii) the aspiration to deliver around 10,000 homes (with housing provision seen as an enabler of economic growth);
 - iii) the creation of approximately 1,500 net new full-time jobs and thousands of jobs during construction with opportunities for apprenticeships for local people;
 - iv) increased economic activity by reason of increased employment and expenditure during the construction phase of the Scheme;

- v) increased economic activity by reason of increased employment and expenditure during the operational phase of the Scheme and the introduction of expanded residential uses; and
- vi) delivery of skills academies that will train, educate and up-skill hundreds of young, unemployed or underemployed people in construction, creative economy, the media sector and other fields.

6.2.2 The ambition for Meridian Water Scheme is to reshape an area that is underutilised previously developed land, to provide new homes and to grow and diversify the local economy, creating job opportunities across the salary spectrum. The development of new and existing economic sectors can unlock economic growth and thousands of new jobs. Meridian Water will make the most of the opportunities offered by a new railway station (potentially incorporating Crossrail 2), and its location in the Upper Lee Valley and LVRP. The SIW are an essential element of the Scheme. They are required to enable the delivery of Phase Two and the subsequent phases of development at Meridian Water.

6.2.3 To help the Council to achieve its ambitions for Meridian Water, in March 2020, the Council's Cabinet approved the Meridian Water Employment Strategy (Core Document 39) that sets the ambitious targets for the wider Meridian Water regeneration programme for the next 20-25 years. It sets out the strategy and associated action plan and specific workstreams to:

- i) Ensure delivery of 6,000 permanent high-quality jobs in new employment space paying London Living Wage or above;
- ii) Deliver 1,000 new high-quality jobs through meanwhile employment uses on land intended for redevelopment, enabling local Enfield employers to supply Meridian Water (starting with its construction with no less than 10% of all investment benefiting local employers);
- iii) Deliver 1,000 jobs through construction and
- iv) Enable local Enfield employers to supply Meridian Water, starting with its construction.

6.2.4 The Employment Strategy includes a set of principles that embed aspiration in a practical framework to shape strategic plans for employment space that will be delivered and operated by the local authority:

- i) High Quality: employment opportunities across a range of industries attractive to the wider London labour market and accessible to Enfield residents, with a fair wage relative to skills

and qualifications required, job security, control, fair working hours, workplace safety, environment and opportunities to learn and progress, available to all, irrespective of gender, ethnicity or class;

- ii) Ethical: diverse ambitions across corporate goals including promotion of health and wellbeing, improving skills, enhancing livelihoods whilst generating profit and driving efficiency;
- iii) Sustainable: awareness of the need to safeguard and improve the environment, with a positive effect on both global and local environment, community, society and economy being prioritised;
- iv) Inclusive
- v) Public health oriented

6.2.5 The SIW and Phase Two will clearly contribute to the economic well-being of the area as housing is an enabler of economic growth. Providing an appropriate housing offer at Meridian Water will not only attract and retain a higher quality skills base but will encourage further inward investment into Meridian Water. It is also widely recognised that housing investment in of itself can be a powerful driver of local economic activity.

6.2.6 Links between housing, economic regeneration and economic well-being are included in the NPPF with the Government's commitment of significantly boosting the supply of homes and supporting economic growth.

6.2.7 The SIW and Phase Two proposals have been borne out of a plan-led approach to redeveloping Meridian Water – itself a significant brownfield redevelopment opportunity that has long been identified for residential-led mixed use redevelopment in the London Plan (and previous versions), adopted Core Strategy and ELAAP.

6.2.8 As I have already outlined above, the adopted Development Plan is strongly supportive of the SIW and Phase Two housing proposals. Core Strategy Policy CS38 clearly articulates its aspiration to provide 5,000 new homes and 1,500 net new full-time jobs at Meridian Water, which is further reinforced in the in the ULVOAPF and in the ELAAP.

6.2.9 The adopted Development Plan strongly supports the principle of intensifying and upgrading the employment offer at Meridian Water. Policy requires development proposals to demonstrate how they will

support the intensification of land uses and higher value-added activities that yield higher jobs densities at Meridian Water. The current low density, low value uses on-site do not align with the Development Plan vision to redevelop the Meridian Water Strategic Growth Area as a vibrant urban mixed-use community of up to 5,000 homes and up to 1,500 jobs.

- 6.2.10 Phase Two proposals therefore seek to significantly enhance the employment offer in terms of quality and quantity of floorspace and jobs.
- 6.2.11 An enhanced employment offer is also in full accordance with the Council's recently published Economic Development Strategy (January 2021). Meridian Water presents an opportunity to intensify land uses and develop innovative new products such as stacked industrial and maker space and build dynamic economic clusters that will create sustainable business communities that will thrive and grow. It has already been demonstrated that the existing largescale industrial typologies at Meridian Water are also ideal to host the nationally and globally important film and tv production sector which is increasingly attracted to Enfield. Longer term, the supply chains that will grow around these larger occupiers will sustain a market for diverse new spaces occupied by service providers, creatives and other entrepreneurs.
- 6.2.12 The delivery of the SIW will enable the ongoing development in growth sectors of the economy including the creative, digital media, e-commerce and software industries. Businesses will find a stimulating and attractive home at Meridian Water which will attract regional, national and international investors to deliver thousands of new jobs across the area. Employment training opportunities will be secured for local residents.
- 6.2.13 In conclusion, housing delivery is an enabler of economic growth with housing investment in of itself being a powerful driver of local economic activity at Meridian Water. The SIW, Phase Two and the Scheme will also drive a step change in the local economy away from low paid, low skilled and low-density jobs towards higher paid and skilled jobs accessible to Enfield residents.
- 6.2.14 This drive towards delivering regeneration to create thriving, affordable neighbourhoods in conjunction with the creation of an

enterprising environment for businesses to prosper with world-class access to the right skills and networks at Meridian Water not only aligns with many of the aims and priorities of Enfield's Corporate Plan 2018-2022 'Creating a lifetime of opportunities in Enfield' but also in my view meets the 'economic well-being' test in Section 226(1A) of the 1990 Act.

6.3 Social Well-Being

6.3.1 In relation to social objectives, the NPPF supports strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being. The delivery of the approved SIW will enable the provision of housing, social infrastructure, including health and social care, education, sports and recreational facilities – all of which are relevant to social well-being and equal opportunities.

6.3.2 In terms of social well-being the proposals have been designed to create active uses at the ground floor level in certain parts of the site and for people to come together and use different spaces whether that be in the park, the high street, along the riverfront or the community streets. Communal spaces in the residential blocks and communal gardens within perimeter blocks will be shared. Phase Two proposals will deliver an array of complementary non-residential uses including employment, and retail community and leisure floorspace and will be able to accommodate a variety of social infrastructure uses. Affordable housing will also be pepper potted throughout the site and the S106 will require no single tenure phases.

6.3.3 The delivery of the SIW enables the promotion or improvement of social well-being by facilitating the:

- i. **provision of around 5,000 new homes with the potential for a further 5,000;**

The SIW and Phase Two will deliver the Council's longstanding regeneration objectives set out in the adopted and emerging Development Plan, as set out in the designation of the Site as a Strategic Growth Area for up to 5,000 homes (with an aspiration for around 10,000 homes) and 1,500 jobs in its Core Strategy. It will support the plan-led growth in the Upper Lee Valley Opportunity Area, which is of strategic importance for the

delivery of ambitious London Plan housing and jobs growth targets.

ii. target provision of c. 43% affordable housing on a habitable rooms basis (in relation to the Phase Two development) and c. 40% by Dwelling number;

As noted earlier, the quantum of affordable housing that can viably be delivered has not changed since the Phase Two Planning Application was originally reported to Planning Committee in March 2020. To ensure that the opportunity to secure grant funding to deliver the 40/43% level referenced in the March 2020 report is not prejudiced, the draft S106 Agreement sets the baseline threshold on a without grant basis and this is 28% by unit and 31% by habitable room.

iii. shaping the new neighbourhood and giving it a distinct new character with a high quality design led approach to planning applications guided by the ELAAP with a focus on open spaces and waterside living;

A set of parameter plans were submitted with the Phase Two Planning Application to establish the key development principles associated with the outline elements of the proposed development including development plots, access and public realm which set the masterplan structure, site levels, building heights and predominant distribution of different land uses at ground and upper floor levels.

A Design Code was also submitted to establish a robust design framework. The Design Code sets out the parameters within which the design of Phase Two, including architectural style and materiality, public realm design, layout and scale will be expected to comply at the reserved matters stage.

iv. improved pedestrian, cycle and vehicular access links to improve permeability and to foster the creation of a healthy and safe community;

Meridian Water will be permeable for pedestrian and cycle access. Pedestrians will be able to move freely and safely throughout the area, with ample pavements. SIW and Phase Two works will improve the quality of the pedestrian and cycling environment by introducing a continuous route along the west bank of the Canal.

v. negotiation of contracts, development agreements and S106 agreements to lock in social value in order to tackle deprivation and poverty in the Edmonton wards and reduce inequality between different parts of the borough; and

Social value is at the heart of the Scheme. Secure and affordable housing is key to achieving wider health and wellbeing outcomes for local people. The Council's Meridian Water Environmental Sustainability Strategy 2020 sets out how the sustainability

strategy will deliver value that goes beyond purely environmental benefits. The Strategy sets out how Meridian Water residents will benefit from high-quality education opportunities and participate in meaningful employment. Adopting an integrated approach to applying carbon positive, environmental positive and zero waste and circular themes will deliver multiple benefits and address local issues such as high unemployment, low school attainment, low income levels and poor digital connectivity.

In terms of the negotiation of contracts the Council is ensuring requirements for social value creation through the construction process are embedded in tender briefs and procurement contracts, providing incentives where appropriate.

6.3.4 Whilst the case for the wider regeneration of Meridian Water is set out in more detail in the Proof of Evidence of Peter George, it is clear that the delivery of Meridian Water is critical for the Council to meet its housing targets (and the development will contribute to London-wide targets). In 2013-2018, an annual average of 573 completions have been achieved which is below the average annual plan target of in the London Plan of 1,246. This is against a backdrop of potentially 150,000 new residents in the borough by 2050 and an MHCLG objectively assessed housing need assessment of some 3,300 units per annum. Accommodating this growth at the right scale and pace will not be possible without a step-change in housing delivery and, given that much of Enfield is designated as Metropolitan Green Belt, it is imperative to maximise delivery on brownfield sites such as Meridian Water. It is also an opportunity to provide affordable housing and new jobs, and to address high levels of deprivation and pressure on temporary accommodation in the borough.

6.3.5 This pressure is even stronger in Edmonton area (Upper, Lower Edmonton and Edmonton Green wards):

- i) Its current population of 57,000 has increased by almost 6% over the last 5 years, and GLA housing-led projections anticipate growth of over 18,000 people by 2033 (over 30%).
- ii) Edmonton Green and Upper Edmonton are among the 3 most overcrowded wards in the Borough.
- iii) The highest proportion of non-decent homes was found in Edmonton Green and Lower Edmonton. A large number of homeless people are placed in Edmonton and
- iv) There are a large number of housing benefit claimants in Edmonton, suggesting a need in more affordable houses.

6.3.6 Given the above, I consider that the SIW and Phase Two meet the ‘social well-being’ test in Section 226(1A) of the 1990 Act.

6.4 Environmental Well-Being

6.4.1 As a flagship development for the Council, Meridian Water over the next decade will become a new sustainable urban neighbourhood making a significant contribution to Enfield’s transition to carbon neutrality, in line with the Council’s Climate Action Plan. One of Meridian Water’s placemaking ‘pillars’ is “Park life on your doorstep: The Greenest Development in London”

6.4.2 Meridian Water will actively restore the natural environment, to promote a significant increase in biodiversity. Continuous green and blue networks will link Meridian Water with the wider LVRP, creating a clean and healthy environment and providing park life on the doorstep for local residents and visitors. 30% of the site area will be set aside as public green space, including parks and squares, active and healthy green streets, and smaller open spaces.

6.4.3 To facilitate the delivery across these and other objectives, the Council’s Cabinet approved ‘The Meridian Water Environmental Sustainability Strategy’ in 2020 (Core Documents 40). The Environmental Sustainability Strategy sets out a vision and framework for how Meridian Water can achieve its ambition to become an exemplar sustainable development. The three identified goals address the three most significant global environmental challenges of climate changes, mass extinction of species and resource depletion:

- i) Carbon Positive – Meridian Water will be carbon neutral by 2030 and strive for carbon positive over the whole life of the development. This will be achieved by minimising embodied carbon in construction, using sustainably sourced materials and fostering active travel and healthy low carbon lifestyles.
- ii) Environment Positive – Meridian Water will see the restoration of the natural environment and promotion of biodiversity through continuous green and blue networks linking Meridian Water to the LVRP.
- iii) Zero Waste and Circular – Meridian Water aims to eliminate waste through the adoption of circular design principles, sharing networks and eco-innovation.

6.4.4 Both the SIW and Phase Two were also supported by an Environmental Statement with effects assessed during the construction

phase and operation phase. Sustainability and Energy Statements were also submitted to demonstrate how sustainable strategies had been considered and implemented during the design of the SIW and Phase Two; and to detail how the proposed design met or exceeded sustainability-focused performance requirements of the Council and the Mayor of London's local planning policies.

- 6.4.5 Officers were satisfied with the assessment and conclusions provided. All of the environmental information contained within the ES, including proposed mitigation measures (where relevant) were taken into consideration by officers. The additional information and revisions submitted during the course of the application were all considered to be minor in nature and did not alter the conclusion that the SIW and Phase two environmental impact, subject to mitigations, were considered to be acceptable.
- 6.4.6 Promotion or improvement of environmental well-being will occur through enhancement of the townscape through the replacement of outdated buildings with a contemporary and well-designed residential development. The public realm will be significantly improved within the Scheme. Environmental benefits include:
- i. redevelopment of a brownfield site;
 - ii. increased housing density appropriate to the increased and sustainable transport connectivity of the area due to the Meridian Water Station, increased train service, increased bus capacity through the Central Spine consistent with the London Plan and NPPF targets for optimising density;
 - iii. creating new employment opportunities close to people's homes;
 - iv. visual and ecological improvements to existing water courses including the creation of 'Brooks Park' (1.64ha) providing a valuable ecological environment for riverine wildlife as well as providing access to semi-natural amenity for local residents; the naturalisation of the Salmons and Pymmes Brooks; provision of Edmonton Marshes (6.5ha) as a new country park within the LVRP;
 - v. provision of efficient layouts and high quality public open space, community and
 - vi. recreational facilities.
- 6.4.7 The SIW enable the provision of new, well-designed, energy-efficient homes that will meet the needs of residents now and in the future. The Council's Development Management Document references the Code

for Sustainable Homes assessment methodology for new housing. DMD Policy 50 requires that all major new build residential development from 2016 onwards meets Code Level 5 (or equivalent assessment method), moving to zero carbon and non-residential major development between 2016 and 2018 must achieve BREEAM 2011 'Excellent' rating.

6.4.8 The Sustainability and Energy Statement submitted with the SIW and Phase Two applications undertook a pre-assessment of the development using the BREEAM Communities scheme. The pre-assessment concluded that an assessment score of 76.81% was achievable for Phase Two, which is above the threshold required for certification at an 'Excellent' level.

6.4.9 I therefore consider the SIW and Phase Two meet the 'environmental well-being' test in Section 226(1A) of the 1990 Act.

6.4.10 In summary, I consider that not only have the well-being tests set out in Section 226(1A) been satisfied in respect of the Order as made and submitted for confirmation but that the SIW and Phase Two also meet the six 'Good Growth Priorities' identified in the London Plan:

- i. Policy GG1 Building strong and inclusive communities
- ii. Policy GG2 Making the best use of land
- iii. Policy GG3 Creating a healthy city
- iv. Policy GG4 Delivering the homes Londoners need
- v. Policy GG5 Growing a good economy
- vi. Policy GG6 Increasing efficiency and resilience

7 Response to Objections

7.1.1 In this section I have considered the representation made by Lee Valley Regional Park Authority (LVRPA) where town planning related issues have been raised and set out the responses accordingly.

7.1.2 The LVRPA own or occupy a number of land plots to the east of Harbet Road including plots 127, 128, 129, 130, 131, 132 and 134.

7.2 Lee Valley Regional Park Authority

The Park Plan – Ground 2

7.2.1 In their objection, the LVRPA confirm that its current ‘Park Plan’ is the ‘Park Development Framework’ – a suite of documents that collectively provide the blueprint for their future ‘efforts’.

7.2.2 Ground 2 of their objection states that the inclusion of the LVRPA’s land is contrary to the “...Park Plan (and the Public Interest)”.

7.2.3 With specific reference to the ‘Park Plan’, it is important to remember that the (already consented) SIW provide that the land currently owned the LVRPA will be used to create a new park, Edmonton Marshes. The proposals for Edmonton Marshes support the flood alleviation strategy and support the new housing providing recreational opportunities for future residents. Edmonton Marshes and the landscaping have been designed with this in mind – if flooding were to occur during extreme events then in such events the area would not be available for use as ‘open space’ where residents can walk, play, exercise etc.

7.2.4 Having regards to the SIW consented works and proposed ‘use’ of LVRPA land to create ‘Edmonton Marshes’ I consider that the works are manifestly compliant with the ‘key strategic policies’ of the Park Plan. In this regard:

- i) The LVRP land is currently degraded (see pictures at the end of this section). The SIW will bring the land into public use making effective use of existing land for recreation, leisure and habitat creation - which meet with the objectives of the LVRPA and the aspirations of the Park Plan which designate this land as a ‘Landscape Investment Area’;

- ii) The design of Edmonton Marshes links it into Meridian Water with pedestrian, cycle and bus routes all connecting through. There are currently no pedestrian accesses into the LVRPA Land and once complete the public will have full access to Edmonton Marshes through a series of entrances on Harbet Road
- iii) The SIW open up east west access across Meridian Water into the LVRPA. These works include cycle and pedestrian routes, as well and a direct links to the Meridian Water Station. The SIW also link the LVRP with new open spaces proposed within Meridian water, such as Brooks Park. Improvements along with Canal open up the possibility for linking Edmonton Marshes and Meridian Water with Tottenham Marshes in the south and to Pickets Lock and Lee Valley Athletics centre in the north
- iv) The flood mitigation measures proposed as part of the SIW on LVRPA's land clearly comply with the Park Plan's strategic policy FR2 to ' Enhance the Park's contribution in mitigating and reducing flood risk to the surrounding areas, by natural flood management and sustainable drainage measures and by supporting SUDs where appropriate.'

'Open Space' definition and Section 19 of the Acquisition of Land Act 1981

- 7.2.5 Whilst not raised in the objection lodged by LVRPA, I also understand that at the Pre-Inquiry Hearing held on 12 February 2021 Counsel for LVRPA queried why it was that the LVRPA land had not been included in the application for certification pursuant to section 19 of the Acquisition of Land Act 1981 ('the 1981 Act').
- 7.2.6 I have been asked to provide my assessment as to whether or not the LVRPA land satisfies any relevant definition for the purposes of section 19 of the 1981 Act. In particular, I am asked to consider whether the land satisfies the statutory definition of 'open space' in this context.
- 7.2.7 'Open Space' under the 1981 Act is defined in Section 19 and Schedule 3 as: "*any land laid out as a public garden, or used for the purposes of public recreation, or land being a disused burial ground*".

7.2.8 As background, I note that the Open Space Application comprises six plots within the Order (plots 102, 104, 105, 106, 109 and 112) – all of which are owned by CRT. The first three plots are required for the creation of the new bridge over the Canal (part of the Central Spine Road). The second set of three plots are required for flood alleviation works. Plot 106 is the only area of ‘open space’ to be acquired by the Council and comprises 58 square metres of the Towpath.

7.2.9 Having regard the current derelict and despoiled nature of the land (see pictures below), together with the manifest lack of any public use or access, it is my view that the LVRPA land does not meet the ‘open space’ definition. In this regard I emphasise the following:

- i) The public at large have evidently not been able to safely access or use the land for recreational purposes
- ii) The condition of land is very neglected with no evidence of regular use as open space and
- iii) The land is not a high quality useable open space and would properly be described as ‘derelict scrubland’.





8 Conclusion

8.1 Conclusion

- 8.1.1 My evidence covers town planning issues relating to the SIW, Phase Two and the Scheme.
- 8.1.2 The need for SIW is established in a hierarchy of planning policy and other documents. Subsequent detailed analysis and studies, undertaken in conjunction with the preparation of the ELAAP and the SIW and Phase Two planning applications, have clearly identified the need for the scale and form of development proposed. The consented works would enable significant levels of regeneration in the area and will create development opportunities by enabling the site for development.
- 8.1.3 Current planning policy identifies the need for significant regeneration in the area and demonstrates a clear and longstanding support for the creation of an integrated and coherent approach to infrastructure, housing and mixed-use development at Meridian Water.
- 8.1.4 In making the Order, regard has been given to the provisions of the Core Strategy and to other considerations that would be material for the purpose of bringing forwards the SIW on the Order Land. The Council has recently adopted its ELAAP, promoted the SIW with public support and the support of the GLA and MHCLG. I consider this provides a sound basis for underpinning the case made in support of the Order and supports the case that that the Order Land is suitable and required for the carrying out of the SIW.
- 8.1.5 I can confirm that the regeneration proposals at Meridian Water are entirely in accordance with policy at national, regional, and local level and fully meet national, regional and local policy imperatives. The detailed issues relating to the form and impact of development have been carefully tested and assessed through the planning application process.
- 8.1.6 With regards to the objectives specified in Section 226 (1A) of the 1990 Act, these are manifestly satisfied by the SIW, Phase Two and the Scheme.

- 8.1.7 In relation to the Order itself, the SIW that is subject of the Order, planning permission has already been granted in respect of it. On this basis I do not consider that there are any planning considerations that could lead anyone to conclude that the Order should not be confirmed.
- 8.1.8 I have demonstrated that there are no planning impediments to the implementation of the SIW and delivery of the Scheme.