

Submission Edmonton Leeside Area Action Plan

Regulation 22 Statement

April 2018

SUBMISSION
Edmonton Leaside Area Action Plan

REGULATION 22 STATEMENT
THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING)
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TABLE OF CONTENTS

1. Introduction	4
2. Draft Area Action Plan Consultation (Regulation 18) (2012)	6
Summary of main issues and how they were addressed	7
3. Proposed Submission Consultation (2015)	12
Summary of main issues and how they were addressed	12
4. Proposed Submission Consultation (Regulation 19) (2017)	20
Summary of main issues and how they were addressed	20
5. Statement on Duty to Co-operate	25
Appendices	
Appendix A: Press Notice	28
Appendix B: List of Respondents	29
Appendix C: Summary of Consultation Responses Edmonton Leaside AAP	30

1 Introduction

- 1.1 This statement has been prepared to comply with the requirements of Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulation 2012. The statement sets out the consultation process undertaken at the 2017 Proposed Submission Edmonton Leaside Area Action Plan (AAP)¹ (Regulation 19), and provides a summary of the consultation undertaken for the pre-submission stage (Regulation 18). There is coverage of the main issues raised and how these have been addressed by this updated Proposed Submission Edmonton Leaside AAP.
- 1.2 Edmonton Leaside is the largest strategic growth area identified in the Council's Core Strategy (2010) and is located in the south east of the borough. It incorporates the regeneration site at Meridian Water, as well as a number of established employment estates, major infrastructure facilities such as the Edmonton Eco Park and Deephams Sewage Treatment Works, the Lee Valley Regional Park and its facilities at Picketts Lock. Core Strategy policies 37 and 38 provide the adopted policy basis for preparing a more detailed area action plan.
- 1.3 The process for producing the Edmonton Leaside AAP began in 2007, and since then there have been several stages of consultation and ongoing discussions to develop the plan with local people and interested organisations, including:
- Joint Issues and Options Report (2008)
 - Discover Central Leaside: Towards a draft Area Action Plan (2012)
 - Proposed Submission Central Leaside Area Action Plan (2014)
 - Proposed Submission Edmonton Leaside Area Action Plan (2017)
- 1.4 The Issues and Options consultation was carried out under the regulations of the Town and Country Planning (Local Development) (England) Regulations 2004, the regulation were subsequently superseded in 2009. On the advice of the then Government Office for London preparation of the Central Leaside AAP was paused to enable the Council to progress its Core Strategy.
- 1.5 Following adoption of the Core Strategy in 2010 work on the AAP recommenced in 2011. The Council produced the 'Discover Central Leaside: Towards a draft Area Action Plan' document to re-engage the community and stakeholders and update on the significant progress made within the area since the previous consultation on the Central Leaside AAP in 2008.
- 1.6 A further round of consultation was undertaken for the 'Discover Central Leaside' document between 12th May and 3rd August 2012 (Regulation 18). A total of 77 separate representations from businesses, public bodies and

¹ It should be noted that the name of the document and AAP area has been amended to 'Edmonton Leaside Area Action Plan', having previously been called the 'Central Leaside Area Action Plan'. The decision was taken at the Local Plan Cabinet Sub Committee of 22nd November 2016 to better reflect the locality.

residents were received for the 'Discover Central Leaside' consultation, and a further 36 for the Meridian Water Masterplan. The comments and representations received during this consultation informed the preparation of the Proposed Submission Central Leaside Area Action Plan (November 2014).

- 1.7 The Meridian Water Masterplan (2012) further developed plans for this priority area of the Edmonton Leaside AAP area. Consultation took place on the Meridian Water Masterplan in 2010 (Landowner and Stakeholder consultation); 2011 (informal consultation July to September 2011) and May to August 2012 (draft Masterplan consultation jointly with the 'Discover Central Leaside' consultation). The Masterplan was adopted in July 2013.
- 1.8 In 2014 preparation of the Proposed Submission Central Leaside AAP commenced, with the document approved by Council on 19th November 2014. The Council published the Proposed Central Leaside AAP for public consultation from 5th January to 16th March 2015. In total 22 submissions were received, which informed subsequent AAP preparation.
- 1.9 Following the 2015 consultation, the Council recognised changing circumstances in Enfield and Meridian Water, including:
 - The award of Housing Zone funding;
 - Increasing population and development pressures;
 - Council purchase of significant land parcels in Meridian Water; and
 - Crossrail 2 proposals.
- 1.10 These changing circumstances required the Council to renew the evidence base for the AAP. Modelling was undertaken to understand the growth potential at Meridian Water. The modelling tested and examined a range of growth scenarios, including at levels of housing and jobs significantly higher than in the Core Strategy. The results informed the revised AAP document.
- 1.11 The Submission AAP therefore consolidates the results of several rounds of consultation and has evaluated many sources of evidence and data to develop the most appropriate options for growth, and, as such, is the culmination of several years of work.
- 1.12 In accordance with Regulation 22 of the 2012 Regulations, this Consultation Statement has been produced as part of the submission documents for the Edmonton Leaside Area Action Plan.

2.0 Draft Area Action Plan Consultation (Regulation 18) (2012)

- 2.1 The Council prepared the “Discover Central Leaside: Towards a draft Area Action Plan’ document and published for public consultation for 12 weeks between May and August 2012. The consultation aimed to re-engage the community and stakeholders following the pause in 2008/9, and to re-establish and confirm the key planning issues for the area.
- 2.2 In accordance with regulation 18 of the 2012 Regulations, consultation bodies, residents and individuals were notified of draft AAP consultation and invited to make comments. Emails and letters were sent to all of the consultees on the Local Plan database, with a link to the online document and details for submission of comments. As well as being published on the Council’s website, paper copies of the document were available at the Council’s libraries and at the Civic Centre.
- 2.3 A press notice was published in the Enfield Independent and an article was published in the ‘Our Enfield’ magazine which is distributed to all households in the borough. The plan was taken to a number of public consultation events and meetings were held with representatives of local community and voluntary groups.
- 2.4 In total 74 responses were received, including from the following organisations:
 - Marine Management Organisation
 - Public Transport Consultative Group
 - Jehovah Witness
 - Greater London Authority (GLA)
 - Thames Water
 - Lee Valley Regional Park Authority
 - Sustrans
 - Natural England
 - CgMS on behalf of Ikea Property Investment Limited
 - Drivers Jonas on behalf of SEGRO
 - Environment Agency
 - GVA Grimley on behalf of LaSalle Investment Management
 - London Borough of Haringey
 - Planning Perspectives on behalf of National Grid Property Holdings Limited
 - Quod Planning on behalf of Dwyer Asset Management plc
 - Hertfordshire County Council
 - Highways Agency
 - CGMS on behalf of the Mayor’s Office for Policing and Crime MOPC)/ Metropolitan Police Service (MPS)
 - English Heritage
 - British Waterways (now the Canal & River Trust)
 - North London Waste Authority
 - Montagu Evans on behalf of Standard Life Investments UK Shopping Centre Trust

2.5 The table below shows how the issues raised at the Reg 18 stage have been addressed in the Regulation 19 Proposed Submission ELAAP documents.

Regulation 18 Issues Raised and the Response

<u>Regulation 18 Issue Raised</u>	<u>Proposed Submission AAP Response</u>
<p><u>Main Issue 1: Allocation of Strategic Industrial Locations (SIL)</u> Concern that the re-allocation of Strategic Industrial Locations (SIL) land to smaller pockets of SIL within the Meridian Water area is inconsistent with the Core Strategy Proposals Map, and that it is not appropriate to seek revised allocations in a manner inconsistent with the adopted wider policy framework, with these sites being too small and having inadequate access arrangements. The re-allocation of these brownfield sites for SIL purposes will lead to them lying vacant, stymying the regeneration of these parts of Meridian Water. These newly proposed SIL areas should be removed as they are a token gesture to ensure that no SIL land is lost, whilst in reality this is what will be happening.</p>	<p>The revised ELAAP fully removes all industrial land designations (including SIL) within the Meridian Water boundary to enable a flexible approach to regenerating the entire site. The AAP establishes a comprehensive approach to transformation that optimises land use, as set out in Section 5.4 Economy and Employment, and policy EL2. Industrial land designations are being removed to enable a flexible approach to workspaces and jobs creation. A comprehensive approach to mixed use development is also required to meet the level of growth in housing and supporting services. The evidence base establishes both the need and opportunity to locate a range of high-value adding growth sectors which will support the economy and generate greater levels of employment.</p>
<p><u>Main Issue 2: Early Development Phase at Harbet Road</u> The potential scope for an early development phase at Harbet Road Industrial Estate was raised, which responds to the current constraints of the site, but would allow for the future redevelopment consistent with the Masterplan vision.</p>	<p>The updated approach in the Proposed Submission AAP is for a comprehensive regeneration which will see the existing Harbet Road estate removed from SIL designation and brought forward as a mixed-use development area.</p>
<p><u>Main Issue 3: Size of Business Units</u> The draft AAP suggests that industrial uses and flexible space for small businesses will be promoted to provide a suitable transition between the more intensively used industrial areas and the emerging residential neighbourhood at Meridian Water. Concern was raised that such space should be sufficient flexibility to allow for large and medium sized industrial uses on all parts of Harbet Road Industrial Estate to allow response to market demand.</p>	<p>The comprehensive regeneration strategy will see the existing Harbet Road estate be removed from SIL designation and brought forward as a mixed-use development area means that there will be flexibility in business units size and use across the area, provided there is compatibility with other uses such as residential.</p>
<p><u>Main Issue 4: Business Types</u> Restriction of uses to B1 on the SIL at</p>	<p>The comprehensive regeneration which will see the existing Harbet Road estate</p>

<p>Harbet Road Industrial Estate was contested, stating there should be sufficient flexibility for permitted uses to include B1, B2 and B8. Other employment generating uses such as hotel, leisure and retail should be considered appropriate, particularly within the northern part of the estate. Proposals to bring forward the Harbet Road Industrial Estate for development as a mixed use commercial scheme in the short to medium term should be included in the forthcoming AAP.</p>	<p>be removed from SIL designation and brought forward as a mixed-use development area means that there will be flexibility in business use type across the area. The removal of the SIL designation does not preclude 'B' uses, provided there is compatibility with other uses such as residential.</p>
<p><u>Main Issue 5: Residential Uses</u> Suggested that the release of SIL land within the Harbet Road Industrial Estate for residential uses has a limited prospect of residential developer interest, due to its incompatible relationship with the remainder of the predominately industrial uses on the site. Any development alongside the canal needs to relate effectively with the proposed residential sites to the west of the canal and it was proposed that an appropriately designed, employment-led scheme would achieve this.</p>	<p>The comprehensive regeneration, which includes the existing Harbet Road estate be removed from SIL designation and brought forward as a mixed-use development area, means that the design and planning approach can support residential led development. The ELAAP provides extensive policy support to appropriate high-quality development along the River Lee Navigation, including commercial, residential and leisure.</p>
<p><u>Main Issue 6: Green Belt Designation</u> Comments on the land to the east of the Harbet Road Industrial Estate, which is designated as Green Belt, stated that over a long period this land has been used for car storage, car park, skip storage and waste recycling uses, and the AAP should realign the Green Belt boundary to reflect this this position and acknowledge that the site is currently brownfield rather than open or utilised green space.</p>	<p>The existing uses of this area are not in themselves justification to remove the green belt designation. Any proposals for this site will be considered in the context of the relevant policies in the London Plan and Enfield's Local Plan.</p>
<p><u>Main Issue 7: East West Transport Connections</u> The facilitation of the proposals to provide a new east-west connection through Meridian Water, including the Harbet Road Industrial Estate, should not be to the detriment of a development scheme's viability.</p>	<p>The east-west connection, known as the Causeway, is a key part of the overall Meridian Water regeneration and development proposals must be considered within this context. The route set out in the Proposed Submission ELAAP is based upon an assessment of constraints, opportunities and urban design principles.</p>
<p><u>Main Issue 8: Improved Pedestrian and Cycle Connections</u></p>	<p>Better pedestrian and cycle connections are a key part of the Proposed</p>

<p>Comments stated that the AAP should highlight the importance of establishing better pedestrian connections from the towpath into the Picketts Lock complex via a new pedestrian and cycle bridge. There is support for the principles for improved connectivity, both north-south and east-west for pedestrians and cyclists. Inclusion of cycle facilities is recommended as an integral part of the new residential development, and also at retail sites and at open spaces.</p>	<p>Submission ELAAP. A route is indicated (Figure 11.1 of the ELAAP) which links east west and goes around Picketts Lock, linking over the waterway to the east and the railway to the west. By utilising the existing canal crossing at Picketts Lock the viability of a scheme coming forward along this route will be enhanced.</p>
<p><u>Main Issue 9: Road Traffic</u> Concern that the AAP does not identify where the main development traffic impact will be, and how these matters should be addressed, while there is a lack of recognition that development will worsen traffic conditions on the local and strategic highway network. A more balanced approach to transport planning is suggested to reduce an over-reliance upon non-car mode and public transport, and recognise that development within this area will generate significant travel demand by car.</p>	<p>Movement and transport in and around Meridian Water will be based upon a range of transport modes, including rail, bus, pedestrian and cycle. The increase in PTAL values, through improvements to rail and bus services, will support the density of housing at Meridian Water. As development proposals come forward a transport impact assessment will be carried out.</p>
<p><u>Main Issue 10: Impact of Potential Waterbus/ Taxi Service</u> Concern over the provision of waterbus/water taxis in this area due to the potential for an increase in waste and impact on water quality.</p>	<p>Policy EL24 on the use of the waterways for transportation establishes that the Council will support opportunities for water-borne traffic where suitable. Any proposal must be considered through consultation with the relevant statutory organisations.</p>
<p><u>Main Issue 11: Town Centres Definition</u> Concern regarding the appropriate level of town centre uses including retail, leisure, restaurants, community facilities, etc, to create an exciting and attractive centre. A quantum of no more than 2,000 sqm of class A1 to A5 uses is too small to create a thriving new centre. Consideration needs to be given to the definition of the local centre with reference to the existing Tesco and Ikea stores. The definition should exclude these out of centre stores in order to control the amount of floorspace in this location.</p>	<p>The Proposed Submission ELAAP requires that development proposals for A-Class uses at Meridian Water which, cumulatively with existing and extant planning permissions lead to provision greater than 2,000 square metres must demonstrate evidence that there would be no adverse effect on neighbouring centres and is in proportion to the growth in local demand. The new town centre is expected to provide primarily for the local needs of Meridian Water, with potential to develop a café and restaurant culture.</p>
<p><u>Main Issue 12: Community</u></p>	<p>The Proposed Submission ELAAP policy</p>

<p><u>infrastructure</u> Concern that provision of additional places of worship in order to meet the future needs of the community, as a result of new homes, are not properly met.</p>	<p>EL5 addresses the provision of community facilities at Meridian Water. There is a need to cater for the needs of both the new and existing communities, with a preference for co-location and multifunctional uses so that they can accommodate a variety of different uses. The requirement for such uses must be proportional to the level of residential development being proposed.</p>
<p><u>Main Issue 13: Lee Valley Heat Network</u> Concern over the principle of creating a low carbon future via a new decentralised energy network due to the likely costs associated with the scheme and whether the scheme would have benefits to the community. Locating the energy generation hub at Edmonton EcoPark not supported, and there is a lack of any high heat density users to support the establishment of such a decentralised energy network.</p>	<p>Large scale decentralised energy networks offer an affordable way of achieving low carbon energy supply in densely populated urban areas, meeting domestic, commercial and some industrial space heating and domestic hot water requirements. The Council is working with partners on the development of a heat network in this area which will capture low carbon heat and supply it to buildings and industry across the Lee Valley and will delivery significant economic, environmental and social benefits.</p>
<p><u>Main Issue 14: Contributions</u> Noted that the vision relies on the delivery of significant infrastructure projects such as new bridges, station improvements and public realm improvements, but that these should be sought in proportion to the scale and type of development proposed, taking into account scheme viability. Noted that the Harbet Road Industrial Estate is a site with many challenging constraints and therefore redevelopment will be costly, and should not be impeded by excessive infrastructure contributions.</p>	<p>Funding for infrastructure at Meridian Water will, in part, be secured by the collection of contributions via the planning system. Enfield's Community Infrastructure Levy (CIL) (2016) charges at a zero rate for residential developments at Meridian Water, due to economic viability grounds arising from high abnormal site and supporting infrastructure costs. The Regulation 123 list directs CIL receipts to supporting the Causeway and the new railway station. Policy EL13 sets out the approach to S106 contributions for development proposals at Meridian Water.</p>
<p><u>Main Issue 15: Heritage</u> Concern that draft AAP does not identify any heritage, or provide any indication of how the historic environment is expected to be improved or utilised in future developments, contrary to section 12 of the NPPF. Also concern that the draft AAP does not recognise the need for development to respond positively to the local character and historical context.</p>	<p>The Proposed Submission ELAAP references the rich industrial heritage evident in the form and structures of the waterways, and that Edmonton Leaside lies within an Area of Archaeological Importance, while the Montagu Road Cemeteries Conservation Area is directly adjacent to the west of the AAP boundary (paragraphs 2.1.5 and 2.1.6.) Policy EL12 requires proposals to demonstrate an understanding of the industrial heritage and archaeology of the</p>

	area.
<u>Main Issue 16: Tall Buildings</u> Concern that the draft AAP is not clear how the Council's approach to managing tall buildings will be implemented and questions whether the area will encourage the development of tall buildings as a mechanism of delivering regeneration.	Evidence for the Proposed Submission ELAAP shows that to achieve the levels of development expected at Meridian Water the average building height will be 7-8 storeys, with tall buildings (usually defined as over 10 storeys) being part of the design solution. Policy EL11, Part C, sets out specific criteria for managing the development of tall buildings at Meridian Water. Tall building policy DMD 43 will also be applicable, as well as London Plan policy.

3.0 Proposed Submission Consultation (Regulation 19) (2015)

- 3.1 The next stage of plan preparation was to undertake the Proposed Submission Area Action Plan, and on 19th November 2014 full Council approved the Proposed Central Leaside Area Action Plan for public consultation.
- 3.2 The public consultation ran from 5th January to 16th March 2015, in accordance with regulation 19 of the 2012 Regulations. Emails and letters were sent out to the approximately 1,500 organisations and individuals on the Council's Local Plan database, informing them of the scope of the document, with a link to the document online and the deadline by which comments had to be submitted.
- 3.3 The AAP and supporting documents was made available online, and paper copies were available at the Council's libraries and at the Civic Centre. A press notice was published in the Enfield Independent on Wednesday 7th January 2015.
- 3.4 Meetings were held with representatives of local community and voluntary groups.
- 3.5 A total of 22 responses were received, including from:
 - Marine Management Organisation
 - AMEC On Behalf of National Grid
 - Office of Rail Regulation
 - Highways Agency
 - Lee Valley Authority
 - Enfield Lock Conservation Group
 - TFL
 - Epping Forest Council
 - Environment Agency
 - Thames Water Utilities Ltd
 - Natural England
 - English Heritage
 - North London Waste Authority
 - Canal & River Trust
 - LaSalle Investment Management on behalf of GVA
 - IKEA
 - QUOD
 - NHS Enfield Clinical Commissioning Group.
 - GLA
 - Lee Valley Leisure Trust
 - London Waterway Partnership

Consultation 2015 - Summary of Main Issues and How They Were Addressed

- 2.4 The main issues arising from the 5th January to 16th March 2015 Regulation 19 consultation, and the Council's response, are set out in the table below.

Issue Raised During 2015 Reg 19 Consultation	Proposed Submission AAP (2017) Response
<p><u>Main Issue 1: Allocation of the Deephams Sewage Works site as Strategic Industrial Land (SIL) is not sound</u> The proposed designation of the Deephams STW site as SIL is not adequately justified. The AAP does not recognise that the STW site is wholly owned by Thames Water and that the entire area is defined as Operational Land for the purposes of sewage treatment.</p>	<p>The London Plan recognises infrastructure as a suitable use within SIL. The AAP text has been amended to recognise Thames Water as the site owner.</p>
<p><u>Main Issue 2: Reference to the Lee Valley Heat Network connecting to Deephams Sewage Works is too specific</u> Deephams STW is self-sufficient in heat requirements and is unlikely to have any significant surplus heat to export. Therefore, it is not certain that Deephams STW will connect to the heat network.</p>	<p>Amendments have been made so that the AAP only requires a connection of Deephams to the heat network if feasible (Policy EL18).</p>
<p><u>Main Issue 3: References to open spaces and green infrastructure</u> Sustainable Development could be strengthened further by reference to Green Infrastructure, open space and or biodiversity provision. The Council should look at the fragmentation of open spaces and the linking of them back to paths and other sites. This would provide opportunities to link sites and areas, whilst also offering sustainable transport options through walking and cycling, together with increasing and enhancing the green infrastructure network. This could also help with issues of recreational pressure and disturbance on the SSSI.</p>	<p>The ELAAP makes numerous references to the networking of green and blue spaces, and the need to support biodiversity. EL9 requires the provision of sufficient open space within Meridian Wader - including parks and linear spaces, along with habitat to enhance biodiversity. EL12 requires environmental remediation, biodiversity enhancements, and the naturalisation of banks along the Meridian Water watercourses. EL27 requires access to waterfront locations along with protecting and enhancing habitats and biodiversity. EL28 supports access across and between existing and new green spaces, developing a network of 'green chains' comprising footpath networks and cycle paths.</p>
<p><u>Main Issue 4: Further consideration should be given to industrial heritage and the potential for archaeology</u> The Plan does not appear to utilise opportunities for using the historic environment as basis in which to inform the development of the area and its</p>	<p>The ELAAP document now references the rich industrial heritage evident in the form and structures of the waterways themselves, and that Edmonton Leaside lies within an Area of Archaeological Importance, while the Montagu Road Cemeteries Conservation Area is directly</p>

<p>connection with its surroundings. This absence reinforces concern that heritage issues have not been fully assessed or taken into account. This includes listed buildings and conservation areas, as well as the potential for archaeology and wider historic landscape character that helps define the wider Lee Valley.</p>	<p>adjacent to the west of the AAP boundary (paragraphs 2.1.5 and 2.1.6.) Policy EL12 requires proposals to demonstrate an understanding of the industrial heritage and archaeology of the area.</p>
<p><u>Main Issue 5: Remove the reference for a footpath across the EcoPark site.</u> Figure 11.1 shows a proposed footpath crossing the southern part of the EcoPark site and paragraph 11.4.16 refers to a new pedestrian and cycle bridge over Salmon’s Brook to connect Edmonton EcoPark to the links to the west. The path would cut across the entrance used by waste vehicles using the EcoPark site, giving rise to significant safety concerns.</p>	<p>The revised ELAAP document has removed this proposed route and the text references to it.</p>
<p><u>Main Issue 6: Inconsistent reference to job numbers</u> Reference to 3,000 new jobs in Meridian Water is not consistent with Core Policies 37 and 38, both of which allocate 1,500 new jobs to Meridian Water. Also, it is inconsistent with other references in the draft AAP which refer to 3,000 new jobs across the whole AAP area. No justification of why the jobs target may have been changed or how, if 3,000 does apply to Meridian Water only, this is achievable and how it relates to the land allocations. Target employment densities within the SIL areas will need to be reflective of the types of uses that are supported in these designations and the employment densities that are reasonable for these uses.</p>	<p>The revised ELAAP establishes a comprehensive approach to regeneration at Meridian Water, which optimises land use and seeks over 6,000 new jobs. The case for this is set out most fully in Section 5.4 Economy and Employment, and policy EL2. Restrictive industrial land designations are sought to enable a flexible approach to workspaces and jobs creation. The increase in job numbers from the Core Strategy reflects the changes which have taken place since this document was adopted in 2010. These include a rising borough population and greater quantum of housing at Meridian Water increasing the requirement for more jobs. Deprivation in the east of the borough can in part be addressed by a higher number and a better quality of jobs.</p>
<p><u>Main Issue 7: The character of the Causeway route must be appropriate to the land uses through which it runs</u> The Causeway route runs through the centre of land designated as SIL. The design aspirations described it are not consistent with the role and function and acceptable uses within SIL, as set out in Paragraph 2.79 of the London Plan – in particular, the requirements for attractiveness, public spaces, squares,</p>	<p>The revised ELAAP establishes a comprehensive approach to regeneration at Meridian Water which optimises land use. Restrictive industrial land designations (SIL) are being removed to enable a flexible approach to regenerating the entire site. The uses along the Causeway can therefore be appropriate to the location and achieve a high quality of public realm while optimising use types.</p>

<p>shopping centres and priority for pedestrians and cyclists. Suggest including details stating that the route should not compromise the SIL designation.</p>	
<p><u>Main Issue 8: The safeguarding of the Causeway route shown is not justified</u> The safeguarding of the specific Causeway route is not justified. No discussion of alternatives is considered, either in the Submission AAP or Sustainability Appraisal. There is no evidence to show that alternatives have been considered and that consideration demonstrates that they are less appropriate.</p>	<p>The revised ELAAP establishes a Causeway route based upon carefully prepared evidence, as set out in Section 5.8 of the AAP. The Causeway is vital to connecting Meridian Water as a coherent entity, and enabling connectivity with the wider area. It is therefore essential to the viability of the Meridian Water regeneration.</p>
<p><u>Main Issue 9: Policy does not state that the route is required to be used by buses</u> The draft policy does not state that the route is required to be used by buses, with a lack of consistency between the AAP and the Meridian Water masterplan.</p>	<p>The revised ELAAP provides a clear policy position in Policy EL6 that the Causeway should be accessible by vehicular traffic between Glover Drive in the west and Harbet Road in the east.</p>
<p><u>Main Issue 10: Allocation of new homes is not justified by evidence</u> The allocation of 1,100 -1,200 new homes in 'Meridian East' is not justified by evidence and is not consistent with London Plan policy. The area is designated as SIL and the introduction of adjacent uses should not compromise integrity of effectiveness of designated industrial land (London Plan Policy 2.17).</p>	<p>The increased and growing need for housing in London and Enfield is well evidenced. The revised ELAAP removes restrictive industrial land designations (SIL) to enable a flexible approach to regenerating the entire site. As demonstrated by the evidence base, to achieve the quantum of development within the Meridian Water boundary requires removal of the SIL designation and significant delivery of residential units to the east of the River Lee Navigation.</p>
<p><u>Main Issue 11: Requirement for higher densities is not justified</u> The requirement for higher densities than London Plan has not been justified as the Submission AAP is not supported by evidence that demonstrates that the required level of housing is deliverable alongside the other land uses (existing and SIL) in this location. It is not consistent with Policy 2.17 of London Plan – that adjacent uses should not compromise integrity of effectiveness of designated industrial land.</p>	<p>London Plan policy 2.13 'Opportunity Area and Intensification Areas', which covers Edmonton Leaside seeks to optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth, and, where appropriate, contain a mix of uses. Furthermore, the revised ELAAP removes the restrictive SIL designations to support regeneration across the entire site. Mixed use types will be enabled to operate effectively within the area.</p>

<p><u>Main Issue 12: Changes to the SIL boundary are not justified</u> Changes to the SIL boundary are not justified and not the most appropriate strategy. The evidence base does not support the loss of SIL, or the re-designation from PIL to IBP. The de-designation of 4.5 hectares of SIL is not supported by evidence, and facilitating housing delivery does not justify such a loss. SIL designations should be made on the basis of an assessment of strategic and local supply and demand (London Plan 2.83 and Policy 4.4).</p>	<p>The revised ELAAP removes all restrictive industrial land designations (SIL) within the Meridian Water boundary. The AAP establishes a comprehensive approach which optimises land use and enables a flexible approach to workspaces and job creation, as set out in Section 5.4 Economy and Employment, and Policy EL2. The approach of mixed land uses is also required to meet the level of growth in housing and supporting services. As such the position of the AAP has moved on significantly. The evidence base establishes both the need and opportunity to locate a range of high-value adding growth sectors which will support the economy and generate greater levels of employment.</p>
<p><u>Main Issue 13: Job figure should be based on evidence of demand</u> The re-designation of SIL is led by job target, not by evidence that there is demand for these types of uses and there is a lack of evidence to suggest that market trends and demands can lead to assumed uplift in job creation to 3,134 jobs.</p>	<p>The evidence base prepared for the revised ELAAP support Meridian Water achieving over 6,000 new jobs. In the wider AAP area, the ELAAP supports an increase in jobs, driven by redevelopment and intensification of the area's industrial estates, including at the Council-owned Montague Industrial Estates where investment can improve outdated infrastructure.</p>
<p><u>Main Issue 14: SIL release is not provided like-for-like</u> The Submission AAP identifies 4.5ha of Harbet Road SIL release and new SIL PIL identification to re-provide this released land. The released SIL land is not re-provided like for like. Its division into two separate land parcels means that it is not providing the type of land required to match the demand and the uses provided on the 4.5ha SIL section. It does not align with guidance in the Land for Industry and Transport SPG (2012), which highlights the fundamental strength of SIL as its scale and critical mass. As narrow strips the two new SIL areas limit the type of buildings that can be accommodated to a much lower scale than at Harbet Road. Furthermore, the largest single SIL addition lies within the Deephams STW site and it is questionable how 'available' this land really is to other occupiers.</p>	<p>The revised ELAAP removes all restrictive industrial land designations (SIL) within the Meridian Water boundary to enable a flexible approach to regenerating the entire site. The evidence base establishes both the need and opportunity to locate a range of high-value adding growth sectors which will support the economy and generate greater levels of employment, as set out in Section 5.4 and policy EL2. The de-designation of industrial land within Meridian Water is therefore not dependent on re-providing elsewhere. The northwards extension of SIL will provide a natural extension to the existing block of SIL which covers industrial estates to the south, providing a good basis for the future management and sustainability of the designated areas. The inclusion of Deephams STW is valid under the London Plan (section 2.79) as a utility. The ELAAP does not expect any non-sewage works uses on</p>

	the Deephams STW site.
<p><u>Main Issue 15: Proposal to implement 'Central Square' would have a significant impact on access and servicing of Ikea Store</u></p> <p>The proposed public squares as described in the AAP would have a significant detrimental impact on the access and servicing of the Ikea store and seem to suggest that the main vehicular access to the store car park is to be relocated to the south (rear) of the site, to Leaside Road, along with the access to the service yard. Altogether, this would have a series of negative effects on the Store's operation.</p>	<p>The revised ELAAP provides for town centre uses and public realm along the Causeway; it does not include the public squares of the 2013 Meridian Water Masterplan. The evidence modelling work which tested the quantum of development at Meridian Water assumes a reconfiguration of parking at the existing retail stores - including for Ikea. The Proposed Submission AAP provides the defined Causeway route. Other more detailed connectivity plans are indicative only.</p>
<p><u>Main Issue 16: Highway capacity</u></p> <p>The Causeway phase 2 section shows a single carriageway road with dedicated footway / cycleway and one lane per direction of traffic, which will reduce the traffic flow capacity of the existing western section of Glover Road, potentially causing significant delays for customer traffic wishing to access the Ikea store car park.</p>	<p>The ELAAP supports improved access which is vital to the successful delivery of Meridian Water and the wider area, including of the road network. Policy EL10 Urban Grain requires development proposals to 'respond to the need for comprehensive, integrated regeneration across the whole of Meridian Water and the surrounding area' and develop a hierarchy-based network of streets. The revised ELAAP shows the detailed Causeway plan at Figure 5.1, providing for a 32m wide corridor in the westerly segments 1 and 2. Policy EL6 allows for vehicular movements along the Causeway. Policy EL25 supports developing a comprehensive road network design. This policy requires that 'the arrangement of streets and places within Meridian Water should be guided by an urban design approach which incorporates sufficient capacity to meet demand'.</p>
<p><u>Main Issue 17: Parking</u></p> <p>The existing car parking at the Ikea store operates nearly at capacity during the busiest trading periods and additional parking spaces would be needed in the future for the car park to operate within capacity. However, the current preferred alignment of the Causeway passes within the immediate surrounding area of the store and proposes changes to the current surface customer car park located to the northeast of the store.</p>	<p>The evidence modelling work which tested the quantum of development at Meridian Water assumes a reconfiguration of parking at the existing retail stores – including at Ikea. Further detailed work will be required for masterplans and development proposals to establish appropriate parking and access.</p>

<p><u>Main Issue 18: Visibility of Store</u> An essential part of the IKEA concept is that customers approach the Store from the front so as to identify the store entrance clearly. The store currently benefits from generally good visibility from every approach/access route. However, the Masterplan proposals show a number of buildings and public squares to be delivered surrounding the store site, which would obstruct store visibility from various aspects.</p>	<p>The evidence modelling work which tested the quantum of development at Meridian Water indicates relatively high densities and a building height average of 7-8 storeys. The configuration of urban form across Meridian Water will be established through more detailed masterplans and development proposals. Policy EL11 provides the approach to tall buildings while EL10 addresses urban grain.</p>
<p><u>Main Issue 19: The AAP is in insufficiently flexible</u> The AAP may be expressed too prescriptively - whilst detail and clarity can be useful, it is very important that the AAP does not impose a rigid blueprint on the area which may become outdated or which may prove not to be viable when it is worked up in detail. The viability work undertaken by the Council to date does not yet provide a sufficiently robust basis to understand the true costs of delivering the opportunity. The site carries a substantial infrastructure burden and it is critical that new development can be consented which is sufficiently valuable to meet those costs. There is recognition at both strategic (OAPF) and local policy (Core Strategy) of the need for flexibility and to adopt a holistic approach to the future use of industrial land. The AAP should not prescribe detailed outcomes or limitations in relation to the scale of residential and other development that can be supported within Meridian Water. The AAP should make clear that the 2,000 sqm town centre figure is indicative and does not represent the maximum level of floorspace that can be provided, subject to the relevant retail policy tests being addressed.</p>	<p>The revised ELAAP is based upon a comprehensive range of evidence. The policies have been prepared to support and guide development while retaining flexibility.</p> <p>The ELAAP approach is to provide a flexible approach to providing employment space and jobs, with section 5.2 and policy EL2 in particular establishing the removal of the SIL designation and the development of mixed-use areas. In terms of housing, Policy EL1 includes a stated potential for 10,000 new homes, subject to mix and tenure, sufficient supporting infrastructure, the de-designation of industrial land and the achievement of high quality urban design. The ELAAP approach to the new town Centre at Meridian Water is to provide primarily for local need, while the floorspace must be in proportion to the level of residential development (Section 5.5 and EL3).</p>
<p><u>Main Issue 20: Combination of land uses to the east of the River Lee Navigation</u> The aim to introduce more attractive uses and activity along the River Lee Navigation is supported, as is the intention for the PIL to be of high quality and well designed; however, the</p>	<p>The position of the AAP has evolved since this comment was received. The evidence-base modelling which informs the revised ELAAP shows that to achieve higher levels of development requires the Harbet Road industrial site to become a mixed-uses area. The AAP therefore de-designates all of the existing SIL at this</p>

<p>boundaries of the PIL, the residential area, and the live/work uses should be reconsidered to avoid any environmental impacts such as noise, dust, odour, and vehicle movements that could negatively impact residential uses. It is recommended that smaller high quality commercial uses should be promoted along the waterside in the non-residential areas.</p>	<p>location. Ensuring the River Lee Navigation is a focal point for community and commercial activity, while achieving high quality design, is supported by several policies including EL3, EL10, EL12 and EL27.</p>
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4.0 Proposed Submission Consultation (2017)

- 4.1 Due to changing circumstances at Meridian Water – as set out in paragraph 1.9 above, the Council undertook to renew the evidence base for the AAP and prepared a revised version of the document. On 25th January 2017 full Council approved the now named Proposed Submission Edmonton Leaside Area Action Plan (ELAAP) for public consultation and submission to the Secretary of State.
- 4.2 In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 the Council invited representations to be made to consider whether the Plan is legally compliant and sound. The public consultation commenced on 15th March 2017 for a period of six weeks. Emails and letters were sent out to the approximately 1,500 organisations and individuals on the Council’s Local Plan database, informing them of the scope of the document, with a link to the document online and the deadline by which comments had to be submitted.
- 4.3 The AAP and supporting documents was made available online, and paper copies were available at the Council’s main libraries and the libraries local to the AAP area, and at the Civic Centre. A press notice was published in the Enfield Independent on 15th March 2017 (see Appendix A).
- 4.4 In total 27 organisations and individuals made representations on the ELAAP. These representations will be submitted with the Edmonton Leaside Area Action Plan for consideration by an independent Planning Inspector.
- 4.5 The main issues arising from the consultation, and the Council’s response, are set out in the table below (for a more extensive summary see Appendix C below).

Regulation 19 Consultation (2017) - Summary of Main Issues and Responses

Issue Raised During 2017 Reg 19 Consultation	Council Response
<p><u>Main Issue 1: De-designating SIL is not justified and is unsound</u> The proposal to de-designate approximately 9.5 hectares of land at the Stonehill Estate (part of the Harbet Road industrial estates) as Strategic Industrial Land (SIL) to assist in achieving this employment figure is not justified and is unsound. The land is required as part of the reservoir of industrial land of strategic importance.</p>	<p>The Council’s adopted local plan identifies Meridian Water as a place shaping priority area. Meridian Water is a transformational regeneration project that has been endorsed by the Mayor of London and supported through the ULVOAPF.</p> <p>There is a need for additional housing due to an increasing population, and persistent issues of inequality in the east of the borough, require the ELAAP to pursue a fresh and transformative approach to land use within the Meridian Water boundary. The restrictive nature of SIL designated land is at odds with the</p>

	Meridian Water approach which should be for mixed-use areas which allow employment, residential and social functions to exist in close proximity.
<p><u>Main Issue 2: 6,000 new jobs at Meridian Water is an aspiration with no firm basis in evidence</u></p> <p>The evidence base is not clear or sufficiently persuasive or robust to justify a realisable aspiration of 6,000 new jobs within the Meridian Water area on which to base de-allocation proposals.</p>	Provision of new jobs is necessary to ensure Meridian Water is a successful and diverse entity, and avoids becoming a dormitory from where the residents must commute to seek work. The restrictive nature of SIL designated land means that Meridian Water needs mixed-use areas which allow employment, residential and social functions to exist in proximity. The evidence base prepared for the ELAAP strongly suggests that over 6,000 jobs can be achieved at Meridian Water.
<p><u>Main Issue 3: New SIL allocations will not re-provide the SIL lost</u></p> <p>Qualitatively, and in terms of the characteristics of SIL outlined in the London Plan, the suggested new SIL allocations are far less suitable to and will not re-provide the usable quantum of SIL that would be lost from the de-designation at Harbet Road. The suggested new SIL allocations should not be regarded as suitable or reasonable replacements for the de-designation of the Harbet Road SIL.</p>	The key reason for de-designation of SIL at Meridian Water is to allow comprehensive regeneration and the delivery of thousands of new homes and jobs. While the proposed new SIL to the north and east of Deephams would partially offset the SIL loss at Harbet Rd, this is not intended to be the main purpose.
<p><u>Main Issue 4: Allocation of the Deephams Sewage Works site as SIL is not sound</u></p> <p>The proposed designation of the Deephams STW site as SIL is not sound and is not in accordance with feedback from the GLA. The AAP does not recognise that the STW site is wholly owned by Thames Water and that the entire area is defined as Operational Land for the purposes of sewage treatment.</p>	The AAP recognises that the Deephams site will continue in ongoing use as an operational sewage treatment works. The Council considers, however, that designation of Deephams STW as SIL is in conformity with the London Plan - which allows utilities infrastructure. Wording will be inserted to clarify that the site will continue in ongoing use as an operational sewage treatment works, subject to further discussion with Thames Water.
<p><u>Main Issue 5: The AAP is not in conformity with the London Plan</u></p> <p>Evidence in the GLA's Land Demand Study (2017) suggests positive demand for industry and warehousing in Enfield for 2016-41. Harbet Road estates benefits from direct access to the A406 which gives the location a strong</p>	Transformational regeneration at Meridian Water is a longstanding aim which is supported by both Enfield Council and the GLA, and is included in both Enfield's Core Strategy (2010) and the London Plan. Meridian Water is an important location to providing homes not only for the

<p>qualitative advantage for logistics and industry. The quantum of SIL and LSIS release and reconfiguration as detailed in Policy EL14 and table 6.2 is not currently in general conformity with the London Plan.</p>	<p>borough, but on a London-wide basis. There is also a great need in this part of the borough to provide more jobs, and higher-paying employment opportunities, to address the high levels of deprivation relative to other parts of Enfield and London. However, the SIL at Harbet Road has led to a low density, and often low value, of employment. Extensive modelling work indicates how a high quantum of new homes and jobs can be achieved at Meridian Water if the whole of the site can be used with greater flexibility. Designated SIL does not allow the flexibility of uses that Meridian Water requires to achieve effective delivery and its regeneration aims. The Council will seek further discussion with the GLA on the approach to industrial land designations within ELAAP.</p>
<p><u>Main Issue 6: Harbot Road Bus Depot.</u> The plan to redevelop the current bus garage site requires a replacement site to be operational before Arriva can vacate the current site. This has been accepted by the Council, but few replacement sites have been offered, and many of those were not within the gift of Enfield Council. Arriva have not regarded any of these sites as satisfactory replacement.</p>	<p>Enfield Council will continue discussions with key stakeholders to establish the future of the bus depot, and to find a suitable site for relocation while maintaining capacity.</p>
<p><u>Main Issue 7: Restricting retail development to only meeting “growth” in retail expenditure is unduly restrictive</u> For town centre use, the policy states that where proposals comprise greater than 2,000m² (taking into account existing and extant planning permissions) the applicant must demonstrate evidence that there would be no adverse effect on neighbouring centres and that the proposal is in proportion to the growth in local demand. The “cumulative test” of existing and extant planning permissions doesn’t define a specific search area, and therefore it might be more appropriate to have a fixed threshold. “Growth in local demand” is not a NPPF compliant term and is not effective.</p>	<p>The policy is written to ensure that growth in retail space must be proportionate to the growth in local demand. The Council will seek further discussions on the Policy EL3 text to ensure clarity in terms of cumulative provision restrictions.</p>

<p>Restricting retail development to only meeting “growth” in retail expenditure is unduly restrictive and should be deleted. This approach would preclude retail proposals meeting existing shortfalls, or capturing expenditure that is leaking out of the catchment.</p>	
<p><u>Main Issue 8: Disturbance impact to the Walthamstow Reservoirs SSSI/ Lee Valley SPA/Ramsar site</u> Concern over the possible recreation disturbance impact to the Walthamstow Reservoirs SSSI/ Lee Valley SPA/Ramsar site. This site is within 800m of Meridian Waters’ 5,000-10,000 new households. Policy EL9 states “The pressure on land availability may result in some open space being provided beyond Meridian Waters, requiring development proposals to show how good linkages to this space can be provided”. Would not support linkages between Meridian Waters and Walthamstow Reservoirs. This point would also be applicable to Chingford Reservoirs SSSI if ‘permit access only’ restrictions were to be removed.</p>	<p>Policy EL9 seeks to ensure that developments are supported by sufficient green space for the new residents of Meridian Water. The Council supports enabling much better use of the Lee Valley Regional Park for residents through improved accessibility and environmental quality. Any proposal must meet the statutory and policy requirements in terms of environmental protection. It should be noted that the Walthamstow Wetlands have recently been partially opened for public access by the London Borough of Waltham Forest. There are no specific plans in the AAP to achieve a direct link to the wetlands.</p>
<p><u>Main Issue 9: Heritage assets</u> Recommend that the document includes a section clarifying how the wider historic environment has been assessed and is to be managed. Identify undesignated heritage assets, how the wider setting of heritage assets are to be managed. The AAP could set how an overall positive heritage strategy might unite these through identification and interpretation.</p>	<p>The Council will seek discussion with Historic England on potential wording to further clarify references to the wider historic environment. Enfield Council already has a heritage strategy in place and it is not considered that a further document specific to ELAAP is necessary.</p>
<p><u>Main Issue 10: The alignment of the east-west route east of the River Lee Navigation has not been considered against an assessment of alternatives</u> The proposed alignment of the ‘Causeway’ route east of the River Lee Navigation has not been considered against an assessment of alternatives, is prejudicial to delivery of SIL uses, is not justified or effective and is therefore unsound. The sections of the Causeway now located on the east side of the River Lee Navigation are inconsistent with and</p>	<p>The reasons underlying the Causeway alignment are set out in paragraphs 5.8.5 to 5.8.10 of the ELAAP. Attaining an optimal alignment for the Causeway is vital to enabling access through Meridian Water. The AAP establishes the route which is critical to protecting the land use to enable regeneration. The route has been developed to balance the requirements for its variety of roles including as a transport corridor, community space, and location for retail. This AAP will establish a primary east-</p>

<p>different to those alignments published in all the Council's previous documents. No comparison or assessment of the merits of the proposed safeguarded route with earlier options – or other potential alignment options – is made in the ELAAP document.</p>	<p>west route for the Causeway, with further technical and detailed site investigation work refining the alignment.</p>
<p><u>Main Issue 11 Flood Risk:</u> Recommend that the Level 2 SFRA is updated and an overarching flood risk assessment and strategy is developed for Meridian Water in particular, as this will help in determining whether there are any sites which may be suitable for offsite flood storage.</p>	<p>The Sequential Test will be applied within the site, steering development towards areas of low flood risk, but where this is not possible, the LPA in consultation with the EA will need to be satisfied that the Exception Test can be passed. The Council is currently updating the Level 1 SFRA and will update the Level 2 SFRA for Meridian Water afterwards (this is unlikely to be before 2019 as this is not possible until the new EA model is released).</p>
<p><u>Main Issue 12: DCO Reference</u> There is no reference in the AAP to the Development Consent Order (DCO) granted in 2017 for the Edmonton EcoPark.</p>	<p>Reference to the DCO will be included and is included in the Schedule of Minor Amendments.</p>
<p><u>Main Issue 13: Parking</u> The existing Ikea car parking operates nearly at capacity during the store's busiest trading periods and additional parking spaces would be needed in the future for the car park to operate within capacity. However the proposed alignment of the Causeway passes within the immediate surrounding area of the store and proposes changes to the current surface customer car park located to the northeast of the store. This would require the removal of a significant area of the car park and its relocation to the south and west areas of the store (within the site boundary) Detailed work will be required to consider how this affects the operation of the store as well as the relationship between the spaces provided and the store's entrance.</p>	<p>Making far more efficient use of the land at Meridian Water is vital to the success of this area. Existing areas of surface car parking are wasteful of space and the AAP evidence base establishes the high number of homes and jobs which can be achieved, based on the assumption of making better use of these car parks.</p>

5.0 Statement on Duty to Co-operate

- 5.1 The 2011 Localism Act introduced a 'duty to co-operate' which places a formal duty on local planning authorities to co-operate with other local planning authorities, County Councils and other specified bodies or persons, including statutory agencies.
- 5.2 The duty to co-operate requires a local planning authority to engage constructively, actively and on an on-going basis whilst particular activities are being undertaken.
- 5.3 The National Planning Policy Framework (NPPF) states that public bodies have a duty to co-operate on planning issues that cross administrative boundaries, particularly those which relate to strategic priorities. The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities (para 178).
- 5.4 Enfield's Duty to Co-operate" bodies include:
- Other local planning authorities
 - The Mayor of London (GLA)
 - Transport for London
 - The Environment Agency;
 - Historic England
 - Natural England
 - Health bodies
 - Office of Rail Regulation
 - The highway authority
 - The Marine Management Organisation
 - Highways Agency
 - Thames Water
 - North London Waste Authority
 - Network Rail
 - The Civil Aviation Authority
 - Local enterprise partnership
 - The Homes and Communities Agency
- 5.5 The Duty to Cooperate bodies have been directly informed of all public consultations carried out on the AAP. The responses received are evidenced in this Regulation 22 Statement, and in previously prepared Consultation Statements.
- 5.6 The Council has ensured that consultation with relevant bodies, including neighbouring authorities, has been continuous throughout the process of preparing the plan and that it meets the requirements of the Duty to Co-operate. The Council's partners in the preparation of the AAP include Transport for London, and key private sector organisations.
- 5.7 The boundary of the Area Action Plan immediately borders the London boroughs of Haringey to the south and Waltham Forest to the east. The Council has worked with its neighbours to ensure that the strategic and cross-boundary implications of the Edmonton Leaside AAP have been considered

and investigated, and this process has fed into the preparation of the AAP. A summary of how Enfield Council has engaged with the neighbouring authorities is set out below.

Waltham Forest Council

- 5.8 Waltham Forest Council has been invited to make comments on the plan at every stage of the preparation and Duty to Cooperate discussions have taken place.
- 5.9 The Council's met on 4th February 2015 and discussed AAP issues including housing, industrial land, retail, transport and schools. No significant issues on the Proposed Submission Central Leaside AAP were raised by Waltham Forest during this meeting.
- 5.10 A meeting between the councils took place on 19th February 2018. Enfield planning team provided an update on the Edmonton Leaside AAP, including the quantum of development, infrastructure improvements, and progress on Meridian Water. It was clarified that school and primary health care facilities will be delivered to support the growth at Meridian Water. No significant issues were raised by Waltham Forest.

Haringey Council

- 5.11 Duty to Cooperate discussions have taken place with Haringey Council and the Council has been invited to make comments on the plan at every stage of preparation.
- 5.12 A meeting between the Councils took place on 29th January 2015, with no significant issues on the Proposed Submission AAP raised during this meeting.
- 5.13 Following notification of stakeholders of the publication of Edmonton Leaside AAP on 15th March 2017, a further email enquiry was sent to Haringey Council on 11th April 2017 requesting a meeting to discuss any aspects of the AAP as part of the duty to cooperate requirements

Duty to Cooperate Conclusion

- 5.14 During preparation of the Edmonton Leaside AAP it is considered that Enfield Council has demonstrated effective co-operation through constructive, active and on-going engagement with relevant authorities and bodies that have an interest in the Plan. Enfield Council considers that the ELAAP would not result in significant strategic or cross-border impacts.
- 5.15 The Council has not received objections to the AAP concerning the duty to co-operate, and the Council's view is that the duty has been fulfilled.
- 5.16 The process of co-operation will not end once the ELAAP has been adopted. The effectiveness of the Plan in delivering the vision and objectives it contains will be subject to on-going monitoring and review.

Appendices

Appendix A: Press notice

Enfield Independent March 2017

enfieldindependent.co.uk
March 16, 2017 59

Announcements - Public Notices

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)
Regulations 19 and 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012

NOTICE OF PUBLICATION OF THE PROPOSED SUBMISSION EDMONTON LEESIDE AREA ACTION PLAN (2017) FOR PUBLIC CONSULTATION

Notice is hereby given that Enfield Council has published its Proposed Submission Edmonton Leaside Area Action Plan for consultation from **Wednesday 15th March to 5.00pm Friday 28th April 2017**. The Edmonton Leaside Area Action Plan will form part of Enfield's Local Plan.

The Edmonton Leaside Area Action Plan covers an area in the south east of the borough which includes the vital regeneration area of Meridian Water, along with Picketts Lock and a number of industrial estates. The Edmonton Leaside Area Action Plan sets out a planning framework to support new housing, jobs, infrastructure and community facilities.

The Proposed Submission Edmonton Leaside Area Action Plan and supporting documentation are available to view online at <http://www.enfield.gov.uk/leasap>, or as hard copies at the Civic Centre, Silver Street, Enfield, EN1 3XA (Main Reception: Monday - Friday 8.30am - 5.00pm); and at the following libraries:

	Mon	Tues	Weds	Thurs	Fri	Sat
Fore Street	9-7	9-7	9-7	9-7	9-5.30	9-5
Edmonton Green*						
Enfield Town**	9-5	9-5	9-5.30	9-5	9-5.30	9-5.30
Millfield House	10-5	10-5	10-5	10-5	10-5	Closed
Ponders End	9-5	9-5	9-7	9-1	9-5	9.30-2.30

* Edmonton Green Library is closed for refurbishment
** Enfield Town Library is open Sundays 12pm - 4pm

Comments can be emailed to: localplan@enfield.gov.uk

Or send to:
Planning Policy Team
Enfield Council
Civic Centre
Silver Street
Enfield
EN1 3XE

Any comments must be received by 5.00pm Friday 28th April 2017. Comments received on the Proposed Submission Edmonton Leaside Area Action Plan will be submitted to the Government for consideration as part of the examination in public.

For further information please contact the Planning Policy Team on 0208 379 3866

www.enfield.gov.uk



Announcements - Public Notices

**THE LONDON BOROUGH OF ENFIELD
(32 Eastbourne Avenue)
COMPULSORY PURCHASE ORDER 2017
COMPULSORY PURCHASE OF LAND IN ENFIELD**

Notice is hereby given that the London Borough of Enfield has made The London Borough of Enfield (32 Eastbourne Avenue) Compulsory Purchase Order 2017, under the Acquisition of Land Act 1981 and Section 17 of the Housing Act 1985. It is about to submit this order to the Secretary of State for confirmation, and if confirmed, the order will authorise the London Borough of Enfield to purchase compulsorily the land described below for the purpose of providing housing accommodation or disposing of the land to a person who intends to provide housing accommodation on it.

A copy of the order and of the accompanying map may be seen at all reasonable hours at the Civic Centre, Silver Street, Enfield EN1 3XA.

Any objection to the order must be made in writing to the Secretary of State at the Department for Communities and Local Government, National Unit for Land Acquisition & Disposal Communities and Local Government, National Planning Casework Unit, 5 St Philip's Place, Colmore Row, Birmingham, B3 2PW before 10th April 2017 and should state the title of the Order, the grounds of objection and the objector's address and interests in the land.

DESCRIPTION OF LAND

All the land and buildings known as 32 Eastbourne Avenue, Enfield, N9 0RX

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Appendix B: List of respondents to 2017 public consultation

1. Health & Safety Executive
2. Committee Member of the Enfield Transport Users Group
3. Natural England
4. Arriva London
5. Lee Valley Regional Park Authority
6. Historic England
7. Thames Water
8. Enfield Transport Users Group
9. National Grid (Amec Foster Wheeler)
10. a). LaSalle Investment Management and Aytans MFG Co UK Limited.
(Turley)
b). LaSalle Investment Management and Aytans MFG Co UK Limited.
(Turley)
11. Highways England
12. Sport England
13. Christian Action Housing Association
14. Tesco Stores Ltd
15. Barratt Homes
16. IKEA PI Ltd
17. Healthwatch Enfield
18. Canal & River Trust
19. North London Waste Authority
20. Newell projects on behalf of Arriva plc
21. North Middx Hospital – NHS Trust
22. Hertfordshire County Council
23. Environment Agency
24. Vibrant Partnerships
25. Education and Skills Funding Agency
26. Enfield Health (Barnet, Enfield and Haringey Mental Health Trust)
27. GLA (incorporating TfL response)

Appendix C: Summary of Consultation Responses to the Proposed Submission Edmonton Leaside AAP – March to April 2017

Response no	Item	Organisation	Location in document	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response
01	A	Health & Safety Executive		Not stated	<p>There is the potential for land allocated in your plan to encroach on consultations zones, namely:</p> <ul style="list-style-type: none"> - Calor Gas Ltd, Stacey Avenue, Edmonton. N18 3PE - Shell Gas Ltd, Picketts Lock Lane, Edmonton. N9 0AS - Thames Water Utilities, Deepham Water Treatment Works, Picketts Lock Lane, Edmonton. N9 0BA <p>The potential for encroachment is being brought to your attention at an early stage so that you can assess the actual extent of any incompatibility on future developments. Information on the location and extent of the consultation zones associated with major hazard establishments and MAHPs can be found on HSE’s extranet system along with advice on HSE’s land use planning policy. Lists of all major hazard establishments and MAHPs, consultation zone maps for establishments, and consultation distances for MAHPs are included to aid planners. All planning authorities should have an authorised administrator who can access HSE’s Planning Advice Web App; further information is available on HSE’s website: http://www.hse.gov.uk/landuseplanning/padhi.htm. When sufficient information on the location and use class of sites becomes available at the pre-planning stages of your local plan, the use of</p>	Potential for any encroachment and conflict with the zones detailed will be addressed during the pre-application and application process on a site-site by basis.

					<p>the Web App could assist you in making informed planning decisions about development compatibility.</p> <p>The guidance in HSE’s Land Use Planning Methodology, available at http://www.hse.gov.uk/landuseplanning/methodology.pdf will allow you to identify compatible development within any consultation zone in the area of your local plan. HSE recommends that you include in your plan an analysis of compatible development type within the consultation zones of major hazard establishments and MAHPs based on the methodology.</p>	
02	A	Committee Member of the Enfield Transport Users Group		Not stated	<p>The "Action Plan" provides no proposals to materially alter the poor PTAL of the area other than some vague references to cycling and reducing parking provision.</p> <p>Enfield's main statement regarding rail is that the line delivers few stopping services and blocks people from cycling.</p> <p>Additional proposals are for buses, to pick up on the AAP's statement that residents east of the Borough are twice as likely as other residents to take the bus.</p> <ul style="list-style-type: none"> - Extend the 24hr 102 bus from Edmonton Green to the Athletics Centre at Picketts Lock. - Subsequently, extend the W8 from Edmonton Green to Tottenham Hale via Meridian Water - The W6 can be extended to Ponders End Bus Garage via Galliard or Nightingale Road. - The other major issue is that there are no north to south bus routes through the AAP - To resolve this matter, I seek a bus from Waltham Cross or Enfield Island Village to Tottenham Hale via Enfield Lock, 	<p>The AAP provides numerous policies to radically improve the PTALs, in particular through improvements to rail infrastructure and bus services – see EL7 and EL23.</p> <p>The Council is engaged in dialogue with TfL to provide bus services which effectively supports the ELAAP area and the wider eastern</p>

					<p>Brimmsdown, Ponders End and Meridian Water of at least 4 buses per hour to begin with.</p> <ul style="list-style-type: none"> - A similar service could connect through from Enfield Town or Waltham Cross via Ponders End High Street and Nightingale Road, again, at least 4 buses per hour. - This could potentially for a bus from Chingford to Tottenham Hale via Meridian Water. It could be an extension of the 379 bus, which at present provides a paltry 9min long journey to the Yardley Estate. - The 505 bus from Harlow to Chingford has an unlikely terminus there. Harlow is far better related to the industrial areas of the Lea Valley4e. - Extend these routes and the existing 192 to Seven Sisters, because at present there is no rail or bus link between the Overground and Meridian Water without a laborious change - There is space between Tottenham Marshes and Tottenham Hale on the A1055 for a bus lane on the approach to Tottenham Hale, utilising an existing central reservation <p>Keen to explore whether a discussion could be had between the Enfield Transport Users Group and the Stratford Transport Implementation Group regarding Rail Future's Lea Valley, Phase 2 proposal. Suggest a new metro rail link with 6 trains per hour to Stratford. Of particular interest to TFL, Network Rail, Abellio Greater Anglia and Westfield Shopping Centre would be the excellent journey opportunities this would provide to Stratford for rail passengers at Tottenham Hale travelling from Kings Lynn, Cambridge, Stansted Airport and Hertford East.</p>	<p>Enfield corridor. Amendments to and provision of bus routes will be addressed through agreements as the developments at Meridian Water are brought forward.</p>
03	A	Natural England		Not stated	<p>See many opportunities in the ELAAP for the implementation of connected green infrastructure and green space. Connected green space is essential for species adaptation to climate change.</p>	<p>Policy EL9 seeks to ensure that developments are supported by</p>

					<p>Concern over the possible recreation disturbance impact to the Walthamstow Reservoirs SSSI/ Lee Valley SPA/Ramsar site. This site is within 800m of Meridian Waters' 5,000-10,000 new households. Policy EL9 states "The pressure on land availability may result in some open space being provided beyond Meridian Waters, requiring development proposals to show how good linkages to this space can be provided". We would not support any linkages being provided between Meridian Waters and Walthamstow Reservoirs. This point would also be applicable to Chingford Reservoirs SSSI if 'permit access only' restrictions were to be removed.</p> <p>The Habitat Regulation Assessment states that policies EL19 and EL20 (Picketts Lock site) will mitigate recreational impacts. However, Picketts Lock is 2.7km from Meridian Waters and will not be as accessible as Walthamstow Reservoirs (800m) unless access to the designated site is seriously restricted. Policy wording needs to include a statement that there will be no accessible linkages between Meridian Waters and Walthamstow Reservoirs or the conclusions drawn by the HRA will not be applicable.</p>	<p>sufficient green space for the new residents of Meridian Water. The Council supports enabling much better use of the Lee Valley Regional Park for residents through improved accessibility and environmental quality. Any proposal must meet the statutory and policy requirements in terms of environmental protection.</p> <p>It should be noted that the Walthamstow Wetlands have recently been partially opened for public access by the London Borough of Waltham Forest. There are no specific plans in the AAP to achieve a direct link to the wetlands.</p>
04	A	Arriva London		Not stated	<p>Any plan to redevelop the current bus garage site requires a replacement site to be operational before Arriva can vacate the current site. This has been accepted by the Council, but few replacement sites have been offered, and many of those were not within the gift of Enfield Council. Arriva have not regarded any of these sites as satisfactory replacement.</p> <p>The ELAAP states that there should be no net loss of bus garage capacity. The scale of development proposed and the need stated in the AAP, most notably in policy EL23, for much improved bus</p>	<p>Enfield Council will continue to discuss the Harbet Road bus depot options with key stakeholders, including Arriva, as to how this facility can be relocated while maintaining the operation capacity.</p>

					<p>services means that significant additional bus garage capacity will be needed. There is no mention in the AAP as to how or where this capacity might be provided, and recent experience raises the additional question of how planning approval for this capacity might be secured.</p> <p>The ELAAP makes much of employment issues in this area: bus driving offers employment opportunities which would be welcomed by many residents of the newly developed area.</p>	<p>Comment noted.</p>
05	A	LVRPA		Not stated	<p>The proposals will have a significant impact on the Regional Park given their scale and proximity. Many of the proposals are to be welcomed in the regeneration of such a large area of underused former employment land to create a high quality and sustainable neighbourhood. It is to be hoped that the anticipated levels of investment will further stimulate developer interest in sites such as Picketts Lock and other parts of the Regional Park. A step change in the regeneration of this area could be delivered.</p> <p>The draft AAP recognises the importance of the Regional Park as a recreation and leisure asset. Whilst this is to be commended it underplays the importance of those areas of marginal land such as ‘Harberts Hump’ which are identified as contributing to the green spaces within the masterplan area. Officers consider that with some significant remodelling there could be some scope for development on this site which could support the Council’s aspirations for new employment opportunities. Further the site should be de-designated from the green belt. The site fails to contribute to the ‘tests’ required by the National Planning Policy Framework (2012) required for greenbelt land.</p> <p>The draft plan doesn’t fully recognise the Regional Park’s offer as a</p>	<p>The ELAAP supports the need to make better use of the potential offered by the Regional Park, particularly at Picketts Lock.</p> <p>Proposals for development within the LVRP will be subject to the planning process. The Council has not seen evidence that the locations referred to by the LVRPA have been demonstrated as not meeting the green belt criteria. – any changes to the green belt boundary will be made through the new Local Plan. The Council will seek further discussions with the LVRPA to identify the locations referred to and consider LVRPAs aspirations.</p> <p>The importance of habitats and</p>

				<p>place for biodiversity with important habitats protected by local designations such as the SINc along the Navigation corridor. Policy in this area needs strengthening. Also the draft plan does not include policies to adequately articulate how access improvements to open spaces adjacent to the North Circular could be realised.</p> <p>The proposals for Picketts Lock accord with the Authority’s adopted position in its PDF and the likely shape of future proposals included in recent marketing work by officers to secure new investment in commercial leisure opportunities. However the proposals still retain the designation of the site as ‘a major developed site in the green belt’. Whilst it is understood that this designation will remain until the Council completes its review of green belt boundaries in time for the new draft Local Plan it is considered that the opportunity, afforded by this consultation, should be taken by officers to object to this designation because it imposes an unnecessary constraint on development opportunities. It is questionable whether this site contributes to the tests required by the National Planning Policy Framework (2012) as required for greenbelt land. Despite the draft Plan’s assessment of Picketts Lock as being relatively inaccessible it does not seek a significant solution to address this apart from the development of a pedestrian/cycle bridge to connect with communities to the west. Given the plan’s focus on delivery it has to be realistic in understanding the constraints on developing Picketts Lock and the proposals for this bridge crossing need careful scrutiny given the ‘burden’ they may place on the costs of development at this site.</p> <p>The Authority’s requests made in response to other draft plans</p>	<p>biodiversity is recognised in the APP, see policies EL20 and EL28. The Council will seek further discussions with the LVRPA to identify any further additions which could benefit the AAP.</p> <p>The designation of ‘major developed site in the green belt’ was established by the adopted Enfield Core Strategy. The MDS designation does not preclude development opportunities for Picketts Lock to come forward.</p> <p>Any proposed future change to Enfield’s green belt boundary will be subject to a Green Belt review and considered through the new Local Plan.</p> <p>Figure 11.1 sets out proposed location of a potential new connection from the Ponders End area towards Picketts Lock. It is recognised that this would be a partial solution, with future work needed to further increase accessibility. Funding for a bridge is not an AAP requirement. The Council will seek further discussions with the LVRPA to</p>
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					<p>prepared by your Council for the relocation south of the existing Ponders End station to better serve the site have not been addressed in this draft. This could be considered as part of an overall package of measures linked to the CrossRail 2 scheme.</p>	<p>address concerns on this area.</p> <p>The location of stations will be considered a part of the process of progressing Crossrail 2; it would be premature of the ELAAP to set out alternative infrastructure for this section of the railway line.</p>
06	A	Historic England	EL12 and paras 2.1 and 4.6	Not stated	<p>The proposed area does not encompass known designated heritage assets, and it is acknowledged that the built environment is largely characterised by post war industrial estates and infrastructure. Consequently the proposed document does not appear to identify policies for the management of the historic environment beyond a requirement to demonstrate an understanding of industrial heritage and archaeology (Policy EL12).</p> <p>The historic significance of the Lee Navigation and associated industrial heritage, and archaeology are identified in the Proposed AAP (paras 2.1.4-6). The proximity of designated heritage assets beyond the boundary is also acknowledged. It is a requirement of national policy (NPPF paragraph 126) that Local Plans include a positive strategy for the historic environment.</p> <p>Therefore recommend that the document includes a section clarifying how the wider historic environment has been assessed, and in accordance with the NPPF, is to be managed.</p> <p>This section could usefully identify undesigned heritage assets, how the wider setting of heritage assets such as designated heritage assets at Chingford Mill and Ponders End Flour Mills, and Montagu Road Cemeteries are to be managed. Additionally it could</p>	<p>Enfield’s approach to Heritage is established through a range of Local Plan documents, including the Core Strategy and DMD. The Council’s Heritage Strategy of 2008 is currently being updated. The Local Heritage Review, which undertook a survey of local heritage assets, was completed in 2017.</p> <p>The Council will seek to discuss with Historic England how further wording could be included at paragraph 2.1.6 to clarify the borough’s position.</p> <p>The heritage assets referenced here, with the exception of</p>

					<p>indicate where new development will be required to undertake additional analysis and how this might reflect the historic environment, seeking opportunities to conserve this.</p> <p>The AAP could set how an overall positive heritage strategy might unite these through identification and interpretation. The AAP could include an overall positive heritage strategy to join together what might become disparate initiatives. This could include an overarching synthetic publication on the area’s heritage.</p>	<p>Montagu Rd Cemeteries, are located some distance from the ELAAP boundary and any effect of development is likely to be very low.</p> <p>Enfield Council has a borough-wide heritage strategy in place, and it is not considered that a further document specific to the ELAAP area is necessary.</p>
06	B	Historic England	Para 2.16	Not stated	<p>The eastern part of the Action Plan area (the railway line and east to the borough boundary) lies within the Lee Valley West Bank or East Bank Archaeological Priority Areas (APA – also known as Areas of Archaeological Importance). This particularly reflects the presence of river valley deposits with high prehistoric and palaeo-environmental potential and also encompasses important later remains and the industrial heritage of the waterways. We support the reference to the APA in paragraph 2.1.6 but this should be followed through with references in section 5.2 to London Plan policy 7.8 and Enfield Local Plan Development Management Policy DMD44.</p> <p>The main known (undesignated) heritage assets are the 18th century River Lee Navigation with the 19th century Pickett’s Lock and a Dark Age crannog at Meridian Water.</p>	<p>The Council will consider the potential for further policy references to be added to section 5.2, and will seek to discuss with Historic England.</p>
06	C	Historic England		Not stated	<p>The most important archaeological site in Edmonton Leeside was found off Glover Drive and excavated in 2004. This was a ‘Dark Age’ (5th century AD) timber platform interpreted as a ‘crannog’.</p>	<p>Consideration for the identification and protection of potential archaeological remains will be carried out as part of the planning</p>

					Further remains related or similar to the Glover Drive structure would be considered undesignated heritage assets of national importance equivalent to a scheduled monument. This should be an early consideration in relation to the proposed 'causeway route' and related development for which pre-application consultation with GLAAS is recommended.	application process.
06	D	Historic England		Not stated	Support the recognition of industrial heritage and archaeology under Policy EL12 and suggest that it is strengthened to refer to providing appropriate evaluation, mitigation (e.g. through archaeological investigation informing design/layout) and interpretation (e.g. through public art or interpretation panels). The River Lee Navigation runs through the area providing a focus for where the local heritage could be interpreted.	The Council is pleased that Historic England recognise heritage support of Policy EL12, and will seek further discussion on the potential for further wording enable development to respond appropriately to the heritage of the area, including opportunities for interpretation.
06	E	Historic England		Not stated	Strategic Industrial Locations (east of railway): There is potential for deeply buried archaeology and palaeo-environmental remains (including Ice Age 'Arctic Beds') deeply buried beneath modern made ground associated with historic industry. Major developments in this area should be supported by geo-archaeological assessment and appropriately targeted mitigation following approaches already taken at Deephams and the Eco Park. The River Lee Navigation runs along the eastern side of the SIL where the local heritage could be interpreted whilst a further, more ambitious possibility might be to re-open the natural course of the river as a new water feature drawing the distinction between the 'natural' (albeit man-modified) river and the artificial cuts.	Consideration of archaeological remains will be carried out as part of the planning application process. Reopening a historical or natural route for the River Lee is not supported by current planning documents, and it would not be appropriate to introduce at this stage of the AAP.
07	A	Thames Water	Section 9, Policy EL18		Largely support Policy EL18 and supporting text as a number of changes have been made in light of previous representations.	Welcome support for Policy EL18.

					<p>However, Thames Water considers that the proposed wording of the section in relation to the proposed SIL designation requires amending; deleting Para 9.1.5 as references to the designation of the site as SIL should be deleted (see separate representation on section 6 and Policy EL14).</p>	<p>See response below to Chapter 6 and Policy EL14.</p>
07	B	Thames Water	Figure 1.1		<p>Land Thames Water own at Harbet Road (to the south of the North Circular) and to the north of the North Circular and south of William Girling Reservoir and is indicated on the plan as existing 'Open Space'. This is incorrect and the current designation is Green Belt.</p> <p>Thames Water's land is not public open space, but is retained operational land. The only public access is where existing public footpaths exist. Part of the site to the south of William Girling Reservoir is currently being used by a third party for waste concrete recycling.</p> <p>Thames Water's strategic land assets can only be released for other uses should it be proven that they are not required either now or in the foreseeable future for Thames Water's operational use.</p> <p>Any proposals would be subject to agreement of commercial terms as Thames Water would also want to ensure they maximize the value of the land for their customers; alongside promoting wider recreational and educational aspirations that stakeholders such as the Borough may have.</p> <p><u>Proposed Change:</u> The Open Space designation on Thames Water owned land at Harbet Road (to the south of the North Circular) and Thames Water owned land to the north of the North Circular and south of William Girling Reservoir should be deleted from Figure 1.1 and throughout the ELAAP.</p>	<p>The term 'open space' is not a specific designation and does not establish a change in designation. However, the Council will seek further discussion with Thames Water to agree suitable terms to describe these locations.</p>

07	C	Thames Water	Table 6.2, Paragraphs 6.4.4-6.4.5 and Policy EL14	Unsound	<p>Chapter 6 of the ELAAP includes the proposal in Policy EL14 to allocate the Deephams Sewage Works site as Strategic Industrial Land (SIL). It is considered that this proposal is not Sound and not in accordance with feedback from the GLA.</p> <p>The Council has not provided adequate justification for the proposed designation, with the ELAAP simply identifying that the site has an industrial character. Whilst this may be the case, the ELAAP does not recognise that the Deephams Sewage Works site is wholly owned by Thames Water and that the entire area is defined as Operational Land for the purposes of sewage treatment. The site is in ongoing use as a sewage works and is currently being that will see development take place that will ensure its ongoing operational use for a period extending at least beyond the life of the ELAAP. The ELAAP also (in paragraphs 6.4.4 and 6.4.5) suggests that designation of the Deephams site as SIL “would consolidate and strengthen the protection of the area for future employment uses”.</p> <p>The proposed SIL designation is considered to be potentially misleading as the implication of SOL designation is that there is the potential for employment development or redevelopment of the site, un-related to its operations sewage works use. This runs contrary to Thames Water’s investment in the site for wasterwater treatment use.</p> <p>On the basis of all of the above, Thames Water objects to the proposed designation of the Deephams Sewage Works site as SIL in Policy EL14 of the ELAAP, as referred to in Chapter 6 and identified on the Proposals Map.</p> <p>Thames Water has raised the issue of large, operational, sewage works in London being designated as SIL with GLA Planning Officers and they agreed that this was not appropriate.</p>	<p>The AAP recognises that the Deephams site will continue in ongoing use as an operational sewage treatment works, with Chapter 9 dedicated to supporting the site.</p> <p>The Council considers, however, that designation of Deephams STW as SIL is in conformity with the London Plan - which allows utilities infrastructure – and will clarify the policy position with the GLA.</p> <p>The Council suggests that wording be inserted into paragraph 6.4.4 to clarify that the Deephams site will continue in ongoing use as an operational sewage treatment works, subject to further discussion with Thames Water.</p>
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					<p><u>Proposed Change:</u> All references to the proposed designation of Deephams Sewage Works as SIL should be deleted from the ELAAP.</p>	
07	D	Thames Water	Section 5.9, Policy EL8, Section 5.10, Policy EL9		<p>Thames Water do not object to the policy in principle, but consider that it needs to be improved in relation to their landholdings and infrastructure constraints.</p> <p>Meridian Water - Thames Water own land at Harbet Road (to the south of the North Circular) which is located within the Meridian Water area. Major underground infrastructure runs through this area which has the potential to significantly constrain the future use of this land. The draft proposals set out in the draft AAP would need to be considered carefully, for example Thames Water would not be able to accommodate some of the proposals close to their existing underground infrastructure.</p> <p>Thames Water Land to the South of William Girling Reservoir - Whilst the consultation document does not specifically refer to the Thames Water owned land to the South of William Girling Reservoir as a flood storage proposal, reference is made to potential upstream flood storage, and the related background technical documents make clear that the site is an identified location for this use. Thames Water’s strategic land assets can only be released for other uses should it be proven that they are not required either now or in the foreseeable future for Thames Water’s operational use.</p> <p>Banbury Reservoir - The policy does not mention that Banbury Reservoir is an operational reservoir owned and operated by Thames Water for public water supply. Thames Water agree that there is an opportunity for improved access into Banbury Reservoir</p>	<p>Proposals coming forward at Harbet Road will be subject to full consultation with all relevant bodies, including Thames Water. The Causeway route has been specifically aligned to respond to the presence of a water tunnel 10m underground.</p> <p>Upstream flood storage may be an important component in protecting Meridian Water from flood risk. Any land identified for flood storage would be subject to full consultation with the land owner.</p> <p>The Council will seek discussions with Thames Water over concerns on wording relating to land ownership and operational use,</p>

				<p>such as reviewing the potential for pedestrian access around the reservoir embankment; depending on arrangements for the management of health and safety obligations. Any access to the reservoir will need to ensure that the structural integrity of the reservoir and the operational function of the reservoir are not compromised. A watersports centre is potentially feasible, subject to understanding the detailed proposals. However, we could not permit a floating clubhouse for operational reasons due to the fluctuating levels in the reservoir and the need for periodic drain downs. Any clubhouse would need to be located away from the reservoir embankments.</p> <p><u>Proposed Change</u> Reference needs to be made in Policy EL8 and EL9 and supporting text to the constraints identified above on Thames Water land.</p> <p>Reference should also be made to the need to work with Thames Water to agree a way forward for proposals involving Banbury Reservoir and Thames Water land at Harbet Road and to the south of William Girling Reservoir.</p>	<p>including of Banbury Reservoir, Harbet Road and to the South of William Girling Reservoir.</p>
07	E	Thames Water	Section 5.12, Policy EL13	<p>Thames Water do not object to the policy in principle, but consider that it needs to be improved in relation to water supply and sewerage infrastructure.</p> <p>A key sustainability objective for the preparation of the Local Plan should be for new development to be coordinated with the infrastructure it demands – see NPPF para. 156.</p> <p>The (NPPG) includes a section on ‘water supply, wastewater and water quality’ (Para 001, Reference ID: 34-001-20140306).</p>	<p>Ensuring the supply of fresh water, disposal of waste water and treatment of surface water run-off are planning applications requirement, and must be demonstrated for any proposals coming forward at Meridian Water.</p> <p>Policy EL13 identifies the key principles in determining the</p>

				<p>It will be necessary for investigations to be undertaken to review the impact of the development in relation to water. Thames Water would welcome the opportunity to work with the Council and developer on opportunities for water efficiency for the new development.</p> <p>In principle there is likely to be drainage capacity available for the development. However there may be the need for localised upgrades and specific requirements for certain development sectors.</p> <p>Thames Water consider that a comprehensive Water Supply and Drainage Strategy for the Meridian Water proposals should be prepared by the Developer/Council in consultation with Thames Water and the Environment Agency.</p> <p><u>Proposed Change:</u> Text making reference to the requirement for a comprehensive Water Supply and Drainage Strategy should be included within the revised document along the lines of the following: [see submission for text]</p>	<p>content and level of corresponding planning obligations. The infrastructure items listed are priorities but the list is not exclusive.</p> <p>The Council will seek further discussion with Thames Water on Policy EL13 regarding the provision of sufficient water infrastructure to support the development of Meridian Water.</p>
07	F	Thames Water	Section 10, 11, Policy EL19, EL20	<p>Deephams Sewage Works is due to undergo a major upgrade which is due to be completed in 2018 and will significantly reduce odour emissions from the site. However, it will not be possible to completely eliminate odour and there are other odour sources in the locality.</p> <p><u>Proposed Change</u> Incorporate text to require a technical assessment to be undertaken to confirm that either: (a) there is no adverse amenity impact on future occupiers of the proposed development from industrial and utility related</p>	<p>The Council will seek further discussions with Thames Water and – because this relates to Picketts Lock - the LVPRA, to assess the appropriateness of incorporating the proposed changes.</p>

					development; (b) the proposed development can be conditioned to ensure that any potential for adverse amenity impact can be avoided/mitigated.	
07	G	Thames Water	Section 13.5, Policy EL28		New and Existing Open Spaces <u>Proposed Change</u> Reference should be made for the need for the Council to work with Thames Water to agree a way forward for proposals involving Thames Water land at Harbet Road and to the south of William Girling Reservoir.	The need to work with Thames Water is already addressed through the following text in Policy EL28: <i>'The Council will work with stakeholders, including landowners, to bring forward new areas of open and green space ...'</i> .
07	H	Thames Water	Section 13.4		Land Thames Water own to the South of William Girling Reservoir and land Thames Water own at Harbet Road (to the south of the North Circular) are identified in the Meridian Water SPD and supporting technical documents as a flood storage proposal. <u>Proposed Change</u> Reference should be made for the need for the Council to work with Thames Water to agree a way forward for proposals involving Thames Water land at Harbet Road and to the south of William Girling Reservoir.	Section 13.4 is not specific to any location; further work will need to be undertaken to select the most suitable location for any flood storage. Policy EL8 makes clear that the Council will work in partnership with stakeholders, including Thames Water to secure an integrated and sustainable approach to the management of development and flood risk.
08	A	Enfield Transport Users Group			The plan notes that there are transport 'issues' in the area, but offers no real proposals to resolve them. Residents in that area are currently twice as likely as residents elsewhere in Enfield to take the bus to work. There is currently a two mile gap between existing stations at Angel Road and Ponders End. Provision for a new station at Picketts Lock should be made.	The AAP provides numerous policies to radically improve PTALs, in particular through improvements to rail infrastructure and bus services – see EL7 and EL23. The location of stations will be

						considered a part of the Crossrail 2 programme; it would be premature to establish a position for this section of the railway line.
08	B	Enfield Transport Users Group			A council estate close to Ponders End that is ripe for renewal and many areas where development could take place mean that ETUG would like to see Ponders End developed to its full potential, although we understand that a limiting factor is that the Mayor has said this would require a 6 trains/per hour service. To do this would require 'quad tracking', which is currently not planned/proposed under the ELAAP.	The Council supports plans to improve rail infrastructure and the frequency of services along this line, including 4-tracking and Crossrail 2.
08	C	Enfield Transport Users Group			While housing development west of the line does not appear to be planned at present we would support such development and this in turn would be facilitated by our suggested static improvements. The station would then support potential redevelopment at the Picketts Lock Athletic Centre. The station would also allow for pedestrian access from Boundary Road.	Regeneration at Meridian Water does include plans for a substantial area of housing – along with other supporting uses - to the west of Meridian Water Station.
08	D	Enfield Transport Users Group			Bus route W8 could also allow direct access from Bush Hill and onward access to (for example) Stratford. It could support a Mayoral Housing Action Zone along with industrial development at Claverings. There is also a 1980s flatted council estate that could be redeveloped. A Mayoral Housing Zone would bring money into the borough; LBE would be looking at delivering in 2026, with housing delivery in 2030/32 along with Crossrail 2.	The Council is engaged in dialogue with TfL to provide a bus service which supports the ELAAP area and the wider eastern Enfield corridor. Amendments to and provision of bus routes will be addressed in coordination with TfL as the developments at Meridian Water are brought forward.
08	E	Enfield Transport Users Group			The Lea Valley line has a half hourly Hertford East - Liverpool Street stopping service and a half hourly Bishops Stortford - Stratford service. Both services skip certain stations and Angel Road is served	The relocation and renewal of Meridian Water Station and the provision of a third track to

					by the Stratford trains only during peak hours Monday - Friday. The first stop northbound after leaving Angel Road is Waltham Cross; this does not help in making journeys to London from Borough of Enfield Stations.	Tottenham Hale are already underway and will allow a significant improvement in the rail service level. Further line upgrades are expected in the future, e.g. a fourth track, will further improve service levels.
08	F	Enfield Transport Users Group			Crossrail 2 and a rebuilt Angel Road station (to be renamed Meridian Water) south of the North Circular Road will enable access to thousands of jobs within a twenty five minutes train journey. But there is no other bus or rail service or connectivity proposed within the ELAAP. In addition the ELAAP criticizes the area for having 'too much parking'. If parking is reduced and there are no additional trains or buses this will bring a serious problem, with people struggling to travel to or from the area.	The AAP provides numerous policies to greatly improve transport levels and accessibility. Policy EL7 supports an improved bus interchange at Meridian Water which connects to the wider North London region.
08	G	Enfield Transport Users Group			Part of the proposed development area is green belt, so the only development allowed is leisure-based. It is a long straight route so therefore could be conducive to developing rowing facilities along the Lee. However there is a poor train service and limited ability to improve this, with no funding at the moment. But it would be possible to improve the bus service.	The AAP does not propose change to the green belt boundary. It does, however, seek to make better use of several green belt locations in terms of quality of the environment, accessibility, and the leisure offering.
08	H	Enfield Transport Users Group			Bus route W6 is a single decker service, which is inadequate for the developments planned on the Eastern side of Meridian Way. It would be better for bus route W8 to be extended and re-routed through to Meridian Water – this is a double decker and is a more frequent service. Re-routing would add another 20 minutes making a total journey time of one hour. That is considered to be quite sustainable and it could also be extended to run on to Tottenham Hale.	The Council is engaged in dialogue with TfL to provide a bus service which supports the ELAAP area and the wider eastern Enfield corridor. Amendments to and provision of bus routes will be addressed in coordination with TfL as the developments at Meridian Water

						are brought forward.
09	A	National Grid (Amec Foster Wheeler)		Not stated	<p>National Grid identified the following high voltage overhead powerlines as falling within the Neighbourhood area boundary:</p> <ul style="list-style-type: none"> - ZBD Route – 275kV from Tottenham substation in Haringey to Waltham substation in Waltham Forest - ZBC Route – 275kV from Tottenham substation in Haringey to Waltham substation in Waltham Forest <p>From the consultation information provided, the above overheads powerlines do not interact with any of the proposed development sites.</p> <p>Gas Distribution – Low / Medium Pressure: Whilst there are no implications for National Grid Gas Distribution’s Intermediate / High Pressure apparatus, there may be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. For further information in relation to the Gas Distribution network contact plantprotection@nationalgrid.com</p> <p>National Grid has provided information in relation to electricity and transmission assets via the following internet link: http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/</p>	Development proposals will be assessed to ensure they do not impact on, or take account of, gas and electricity infrastructure. The National Grid will be consulted on any proposals as they are brought forward.
10	A	LaSalle Investment Management and Aytans MFG Co UK	EL2, Section 6.4, Figure 6.1 and Table 6.2	Soundness	The intention to achieve 6,000 new jobs at Meridian Water is an aspiration with no firm basis in evidence. The proposal to de-designate approximately 9.5 hectares of land at the Stonehill Estate (part of the Harbet Road industrial estates) as Strategic Industrial Land (SIL) to assist in achieving this employment	The policy framework for this AAP is long established, a commitment adopted by Core Strategy Policy 37. Furthermore, the Council’s adopted local plan identifies

		<p>Limited. (Turley)</p>		<p>figure is not justified and is unsound. The land is required as part of the reservoir of industrial land of strategic importance.</p> <p>Policy EL2 is directly counter to the Development Plan position and ULVOAPF that the protection of SIL in this location is as important to the success of the growth areas as the new mixed-use developments proposed. Also, no recognition is given to the extant outline planning permission ref. APP/Q5300/W/14/3001257 granted for more than 46,000 sqm of B1c, B2 and B8 use at the Stonehill Estate.</p> <p>The reasons for the proposed de-designation of the Stonehill Estate as part of the Harbet Road industrial estates is not sound due to:</p> <ol style="list-style-type: none"> 1. The evidence base is not clear or sufficiently persuasive or robust to justify a realisable aspiration of 6,000 new jobs within the Meridian Water area on which to base de-allocation proposals; 2. Employment land within Enfield Borough and at this location provides a critical resource of more than sub-regional importance and the quantum of this has been declining. It has been released above the target release rate and the SIL allocation for the Stonehill Estate should be maintained; 3. There is a proven economic need for logistics and distribution uses in this location and this need will increase as population numbers and densities increase; 4. The Stonehill Estate is ideally suited to accommodating employment uses – particularly for industrial, logistics and manufacturing; and 5. Industrial, logistics and manufacturing uses at the Stonehill Estate can contribute directly to the economic and employment objectives for Meridian Water by generating high quality skilled jobs and will not compromise the delivery of other objectives for Meridian Water in the 	<p>Meridian Water as a place shaping priority area focused on addressing deprivation in some of the most deprived communities in London. Meridian Water is a transformational regeneration project that has been endorsed by the Mayor of London and supported through the ULVOAPF. Provision of new jobs is necessary to ensure Meridian Water is a successful and diverse entity, and avoids becoming simply a dormitory from where the residents must commute to seek work. Due to the restrictive nature of SIL designated land, the approach at Meridian Water must be for mixed-use areas which allow employment, residential and social functions to exist in close proximity.</p> <p>The need to provide additional housing due to an increasing population, and persistent issues of inequality in the east of the borough, require the ELAAP to pursue a fresh approach to land use within the Meridian Water boundary.</p> <p>It is not a requirement for the</p>
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					<p>ELAAP.</p> <p>The continued allocation of the Stonehill Estate as SIL is important to support employment and economic growth in Meridian Water. The type of businesses it will accommodate and the quality and diversity of jobs created are entirely compatible with the delivery of employment objectives for Meridian Water in the Development Plan. It will not unduly prejudice delivery of intentions for other parts of the ELAAP at Meridian Water, such as the delivery of new homes.</p> <p>The alterations required to the ELAAP which should be made are:</p> <ul style="list-style-type: none"> • Re-wording of Policy EL2 and section 5.4 to reflect retention of the SIL allocation within Meridian Water – for at least 50% of the SIL area. If 50% is to be retained, the Stonehill Estate should retain its SIL allocation for reasons that: It benefits from an outline planning permission for SIL-appropriate uses and is more easily accessible to the North Circular. Furthermore, employment buildings can provide a beneficial screening buffer function to residential and other noise-sensitive uses from the environmental effects of the traffic using the North Circular; • Include reference to the Stonehill Estate under Policy EL15 and policy wording which is supportive and encouraging of redevelopment and enhancement for SIL compatible uses; and • Revision to the ELAAP Policies Map and Figure 6.1 accordingly 	<p>ELAAP to reference planning permissions within the plan area, including the outline permission at Stonehill granted at appeal in 2015.</p> <p>While the demand for logistics industrial uses within the Upper Lee Valley is recognised, Enfield will continue to provide a large quantum of classified industrial land within ELAAP and the wider eastern corridor. The critical factor at Meridian Water is the long-established regeneration, supported by adopted policy to provide a large quantum of new homes and jobs through transformational change.</p> <p>The Council considers that the full release of SIL at Harbet Road is of such importance to support the successful regeneration and the step change required to viably deliver both the quantum of housing and uplift in employment opportunities. Releasing a lower proportion of SIL land would lead to a sub-optimal outcome and would undermine the delivery of sustainable communities.</p>
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10	B	LaSalle Investment Management and Aytans MFG Co UK Limited. (Turley)	Paragraph 6.4.3 Figures 6.1, 6.2 Policy EL14	Unsound	<p>The new allocation of Deephams Sewage Treatment Works within the ELAAP area as SIL is not justified as a suitable, appropriate or effective strategy to replace that which would be lost at the Stonehill Estate and/or to maintain capacity for employment of industrial, logistics and distribution uses when considered against the alternative of retaining the 9.5 ha of the Stonehill Estate (and Harbet Road estates) as SIL.</p> <p>Allocating land such as the Deephams STW which Thames Water fully intends to continue using as operational land (which itself will serve the infrastructure needs of new development) is unrealistic, undeliverable and cannot properly be regarded as offering usable 'capacity' or a 'reserve' for industrial, logistics and related uses</p> <p>Furthermore, the Deephams land (and the parcel to the north of Deephams and strips of land to the east) are more remote and less accessible to the North Circular than the Stonehill Estate. Qualitatively, and in terms of the characteristics of SIL outlined in the London Plan⁴⁴ the suggested new SIL allocations are far less suitable to and will not re-provide the usable quantum of SIL that would be lost from the de-designation of the Stonehill Estate or Harbet Road.</p> <p>For these reasons, the Deephams STW, parcel to the north of Deephams and strips of land to the east should not be regarded as suitable or reasonable replacements for the de-designation of the Harbet Road SIL. The proposed SIL allocation for Deephams STW should be removed as new SIL from draft Policy EL14, the Policies Map, Figure 6.1 and Table 6.2.</p>	<p>It is recognised that the Deephams site will continue in ongoing use as an operational sewage treatment works. The Council considers, however, that designation of Deephams STW as SIL is in conformity with the London Plan - which allows utilities infrastructure.</p> <p>As set out in the response above, the Council will seek to discuss with Thames Water wording at paragraph 6.4.4 to clarify that the Deephams site will continue in ongoing use as an operational sewage treatment works.</p> <p>While the proposed new SIL to the north and east of Deephams would partially offset the SIL loss at Harbet Rd, the key reason for de-designation of SIL at Meridian Water is to allow comprehensive regeneration and the delivery of thousands of new homes and jobs.</p>
10	C	LaSalle Investment	Policy EL6 Paras 5.8.1	Soundness	The proposed alignment of the east-west 'Causeway' route east of the River Lee Navigation has not been considered against an	The reasons underlying the Causeway alignment are set out in

		Management and Aytans MFG Co UK Limited. (Turley)	to 5.8.10 Figure 5.1	<p>assessment of alternatives, is prejudicial to delivery of SIL uses, is not justified or effective and is therefore unsound.</p> <p>The sections of the Causeway now located on the east side of the River Lee Navigation are inconsistent with and different to those alignments published in all the Council’s previous documents.</p> <p>No comparison or assessment of the merits of the proposed safeguarded route with earlier options – or other potential alignment options – is made in the ELAAP document. Similarly, there is no testing of alternatives in the Sustainability Appraisal undertaken by AECOM (March 2017) or the document prepared by (KCA) titled ‘Edmonton Leaside Area Action Plan ‘Spatial Framework’, February 2017, published as an evidence base document. As such, the Sustainability Appraisal is considered to be legally flawed and not fit for purposes. The requirement in law for the ELAAP to be the subject of sustainability appraisal has not been fulfilled.</p> <p>Page 11 of the KCA ‘Scenario Testing’ document states that “Releasing Strategic Industrial Land is essential to enable the critical east-west connection across the site and the access to the Lea Valley Regional Park”. This is not correct and is not reflected by the Development Plan documents, Meridian Water Masterplan or other guidance referred to above.</p>	<p>paragraphs 5.8.5 to 5.8.10 of the ELAAP. Attaining an optimal alignment for the Causeway is vital to enabling access through Meridian Water. The AAP establishes the route which is critical to protecting the land use to enable regeneration.</p> <p>The route has been developed to balance the requirements for its variety of roles including as a transport corridor, community space, and location for retail. This AAP will establish a primary east-west route for the Causeway, with further technical and detailed site investigation work refining the alignment.</p> <p>While the release of SIL will allow the full potential of the Causeway to be realised, it is accepted that the route could be achieved without SIL release.</p>
10	D	LaSalle Investment Management and Aytans MFG Co UK Limited.		<p>The intended role of the east-west route in the ELAAP as a ‘destination’, (supporting retail, leisure, community and cultural uses) is unrealistic, unsuitable within a SIL and further prejudicial to delivery of SIL uses.</p> <p>The de-designation of the SIL there should not be assumed. In any</p>	<p>The Causeway will be a vital link running through Meridian Water and will fulfil multiple roles that provide for retail, community and transport. The AAP seeks the removal of SIL designation which</p>

		(Turley)		<p>event, the land benefits from outline planning permission for B1c/B2/B8 uses and it is the intention of the owners to secure the implementation of that permission. Retail, leisure, community and cultural uses are not included in the permission – and are generally not permitted within SIL.</p> <p>No recognition is given in the ELAAP to the outline permission and this is a significant shortfall of the strategy and reasoning for both the proposed de-designation of the Stonehill Estate as SIL – and the ‘dual role’ of the Causeway route.</p> <p>Segment 3 Appraisal</p> <p>Paragraph 5.8.9 of the ELAAP document describes Segment 3 and explains that it maintains the alignment of Segment 2 from the west side of the canal. No explanation is given why this is necessary or justified.</p> <p>Is stated that the alignment is also informed by public transport requirements “to introduction [sic] an effective bus service requires that pedestrian access to the bus stops is located a maximum of 200 metres from any residence. However, there is no certainty that there will be residential uses within the Stonehill Estate or wider SIL to which the 200 metre figure relates. Indeed, the 200 metre figure is much shorter than used elsewhere in the ELAAP and Sustainability Appraisal. Policy EL23 references that major new developments have good access - of no more than 640m from the development - to a bus stop. The 640 metre figure is from the TfL document ‘Assessing Transport Connectivity in London’, April 2015</p> <p>Segment 3 is also located on top of existing buildings which the Council does not own or control (and so it cannot deliver this</p>	<p>will also remove the restrictions on non-industrial use activities.</p> <p>It is not a requirement for the ELAAP to reference planning permissions within the plan area, including the outline permission at Stonehill granted at appeal in 2015.</p> <p>The AAP provides for mixed uses on the east bank of the River Lee Navigation, which is aligned with the position following removal of the SIL designation. Development of residential uses will require good access to public transport, to which bus services play an important consideration. Shorter distances to bus stops in a high-density location will be a key benefit.</p> <p>The Meridian Water Masterplan (2013) has been superseded, and the Council is now seeking comprehensive redevelopment at Meridian Water to the east of the River Lee Navigation.</p>
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				<p>segment alignment) and ignores existing access routes. Segment 3 runs diagonally between Silvermere Drive (to the north) and Anthony Way to the south. This approach runs counter to the MWM objective that the east-west route should give consideration to existing infrastructure, and have least possible impact on existing employment facilities. The alignment also creates irregular building plots which will compromise the optimisation of the development that can be achieved either side of the route under the outline permission and through regeneration generally.</p> <p>Segment 3 of the Causeway route in the ELAAP is not justified or effective and its present alignment could undermine the delivery of the outline planning permission on the land. To avoid this, (and mitigate the impact on optimal development layout for SIL uses) it is suggested that the alignment of Segment 3 be altered to run parallel with Silvermere Drive and Anthony Way. If the alignment were to connect with the Angel Bridge crossing point shown as part of Segment 2 on Figure 5.1 the alignment for Segment 3 would sit just north of Anthony Way. This alignment would not unduly prejudice accessibility of occupiers of new uses developed in this area to new bus stops on the route.</p> <p>Segment 4 Appraisal Paragraph 5.8.10 in the ELAAP states that Segment 4 responds the specific constraint of a water tunnel approximately 10 metres underground. To limit building costs over this tunnel the Causeway adopts the alignment of the tunnel. However, existing buildings have been developed over its route and, accordingly, it is not the major constraint to development and buildings being constructed over it that the ELAAP suggests.</p> <p>Advanced discussions have taken place between LaSalle Investment</p>	<p>The alignment of Section 3 is justified for the reasons set out in the AAP.</p> <p>The requirement for a specific engineering solution indicates that the water tunnel does present an obstacle to development. This will be subject to further site investigation. The proposed development at the Triangle Site (which has now received permission) constitutes low-rise industrial units. ELAAP establishes a framework for a far greater</p>
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				<p>Management’s structural engineer and Thames Water engineers regarding the redevelopment of a site known as the Triangle site west of Harbet Road and east of Rivermead Road (within the Stonehill Estate). The construction of the tunnel is such that it needs compression/loading from soils either side and from above to ensure its structural integrity. Other than consideration and engagement with Thames Water regarding foundation design and the method for addressing loading/unloading on the tunnel during construction, the spine tunnel is not regarded as a particular constraint to new buildings build erected above it and along its route. For this reason the ‘very specific constraint’ identified at paragraph 5.8.10 to justify the position of Segment 4 is not a fundamental constraint.</p> <p>The alterations required to the ELAAP which should be made are:</p> <p>Re-wording of explanatory text at paragraphs 5.8.1 to reflect the functional role of a central east-west route as a strategic east-west link supporting development (in the same way as for Core Policy 37 and 38), as a focus for public transport, pedestrian and cycle movement and activity, but removing references to non-SIL uses creating this activity.</p> <p>Figure 5.1 to be amended to show the route as illustrative/indicative (i.e. not rigid/safeguarded) with widths deleted. An alignment located to the south of the Stonehill Estate boundary is suggested, running parallel to and just north of Anthony Way. The detailed descriptions at paragraphs 5.8.7 to 5.8.10 seeking to justify the alignments of Segments 1-4 should also be deleted.</p> <p>Policy EL6 includes a significant number of requirements and</p>	<p>density of development.</p> <p>ELAAP removes the SIL designation, which will allow non-SIL uses to be permitted along the full length of the Causeway.</p> <p>For the reasons described above, Figure 5.1 and Policy EL6 should not be subject to the changes suggested by the respondent.</p>
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					<p>criteria which will be onerous and prejudicial to the delivery of SIL uses and/or the uses permitted by the outline permission if the east-west route were to run through or immediately adjacent to the Stonehill Estate. The policy requires significant simplification. The opportunity to discuss these changes with officers at the Council would be welcomed.</p>	
10	E	LaSalle Investment Management and Aytans MFG Co UK Limited. (Turley)	Paras 12.1.2, 12.1.3	Soundness	<p>The need for new development to embrace the principles of sustainable design and construction to both mitigate and adapt to climate change is acknowledged.</p> <p>New development within the ELAAP should only be expected to achieve the sustainable design and construction standards as set out in Development Plan policy in Table 12.2 and should not be expected to go beyond these requirements to secure ‘the highest standards for sustainable design and construction’.</p> <p>Inclusion of this text is confusing and creates uncertainty with regards to the standards which new development should seek to achieve. In the absence of any evidence or policy wording to introduce new sustainable design and construction standards, the wording is not justified and is therefore unsound. The text should be amended to implement only those standards within adopted planning policy.</p> <p>The alterations required to the ELAAP which should be made are therefore:</p> <ul style="list-style-type: none"> - Deletion of the words ‘The Council is committed to achieving the highest standards for sustainable design and construction within the borough’ from paragraph 12.1.2 - Deletion of the words ‘This includes the incorporation of 	<p>The Council will make amendments to paragraphs 12.1.2 and 12.1.3 as set out in the <i>Schedule of Minor Amendments</i>, items no’s. 39 and 40.</p>

					solar panels and ground source heat pumps. The Council will seek to attain the BREEAM highest levels for new developments' from paragraph 12.1.3.	
10	F	LaSalle Investment Management and Aytans MFG Co UK Limited. (Turley)	EL26		<p>The ELAAP seeks to introduce new targets for sustainable design and construction which are not clear, nor are they supported by the evidence base or Development Plan policy wording.</p> <p>Paragraph 12.3.6 of the ELAAP summarises the proposals of energetik to deliver this network. However, these are only conceptual in nature and no specific evidence has been provided to support the ELAAP which demonstrates any of the following:</p> <ul style="list-style-type: none"> a) that the LVHN is technically viable given the proposed building types within the ELAAP and the encouragement for buildings to deploy other renewable energy technologies in addition to connecting to the LVHN; b) the network is deliverable from a commercial perspective and can deliver heat at a competitive rate; c) all reasonable alternatives have been explored to deliver carbon savings; d) the local gas network has sufficient capacity and pressure to meet the requirements of the heat network within the ELAAP; e) the routes for the pipe network which are crucial to the installation of the site wide system are capable of being delivered and free from constraints; and f) the LVHN is still viable in carbon terms when taking into account electricity grid decarbonisation and applying current and future anticipated electricity emissions factors. In particular, the policy requirement for developments to install CHP at a later date if the LVHN fails to materialise has the potential to increase the quantum of gas CHP in the LVHN 	<p>Evidence for the LVHN has been developed through the <i>Upper Lee Valley Decentralised Energy Network Pre-Feasibility (2011)</i> and the <i>ULV DEN Feasibility Study (2012)</i>.</p> <p>The investment case for Energetik was agreed at Cabinet in January 2017.</p> <p>The Council therefore has a clear case for the provision of a viable DEN in and around Meridian Water.</p> <p>The Council will make amendments to Policy EL26, Part C, as set out in the <i>Schedule of Minor Amendments</i>, item no. 55.</p> <p>The requirement for all major developments to connect to or contribute towards existing or planned DE networks is already established in adopted policy DMD 52. Policy EL26, Part D reinforces this approach.</p>

				<p>mix, at a time when associated emissions would be higher than with a gas boiler solution for that development; and</p> <p>g) the environmental effects of the ERF (for example in terms of air quality) on occupiers of new homes and employment uses at Meridian Water have been adequately assessed in determining the location and appropriate and target levels of development for Meridian Water in the ELAAP.</p> <p>With regards to Policy EL26, there are very specific requirements within this policy – in Parts C and D - that have not been subject to viability testing or are justified by an evidence base. We are particularly concerned with the requirements of Part D of Policy EL26, as it is mandating the use of a specific temporary technology along with the use of a specific energy supplier. In the absence of any specific evidence base or justification, this will add significant commercial and technical constraints to new development and remove the opportunity for new development to source the most competitive energy supplier. Furthermore we consider there to be a significant conflict of interest with the deployment of the LVHN and the creation of ‘energetik’ given that Enfield Council is a stakeholder within the business and therefore is in a position to gain financially from the success of the LVHN.</p> <p>In order for much of Policy EL26 to be justified, independent evidence base studies should be undertaken in accordance with the requirements of the NPPF which investigate the commercial and technical viability of the LVHN against the specific proposals of the ELAAP. The Council should also consult with all appropriate stakeholders to develop an appropriate scope of work for the evidence base study to support the requirements of Section 12 of the ELAAP and Policy EL26. Without this, and for the reasons stated, the policy wording needs to be comprehensively reappraised.</p>	
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10a	A	LaSalle Investment Management and Aytans MFG Co UK Limited. (Turley)	Sustainability Appraisal		<p>The SA in its current form is unsound, legally flawed and not fit for purpose, for reasons that:</p> <ul style="list-style-type: none"> a) It has failed to issue a revised scoping report in light of significant material changes to the baseline situation; specifically the consent of the Energy Resource Facility (ERF) at the Edmonton Eco Park in February 2017; and b) No recognition is given in the SA report to the Outline Planning Permission for 46,451 sqm (GIA) of light industrial (B1c), and/or general industrial (B2) and/or storage and distribution (B8) floorspace, at the Stonehill Industrial Estate within the ELAAP area) as a reasonable alternative that would facilitate the intensification and regeneration of existing employment land within the ELAAP area, in line with the Development Plan. 	<p>The evidence and context on which the SA Scoping Report was prepared have not changed to a material extent, and the Report remains valid.</p> <p>The outline planning permission granted at Stonehill conforms with the existing use type of the area. Within the context of the Meridian Water development, implementation of this permission would lead to a very limited level of intensification and undermine delivery of this strategic regeneration project. effect.</p>
11	A	Highways England			<p>Highways England’s interest in the AAP relates to the potential impact of resulting development traffic from sites within the development boundary on the SRN, in this case the M25, M1 and M11. Highways England notes that the AAP seeks to regenerate and develop the Central Leaside area bringing a substantial number of new homes and employment to the area including the Meridian Water development and the development of Edmonton Eco Park.</p> <p>It is pleasing to note that the council will seek to positively promote walking and cycling by requiring improvements to existing routes and by providing additional connectivity into and through the area. Also support encouraging the use of public transport by working with TfL and service providers to increase frequency and expand routes in the Central Leaside area. Further demand management</p>	<p>The Council is promoting a modal shift away from private motor vehicles and towards walking and cycling, and the use of public transport.</p>

				<p>measures also include parking control. All measures should be considered ahead of major infrastructure improvements and accept that there will be a need to undertake some local network improvements.</p> <p>It should be noted that Highways England have not been consulted on the Meridian Water development. It is a large development with quite a high number of proposed two-way trips (16000 AM Peak and 11000 PM Peak) and it is likely that these could impact on the SRN; more specifically M25 J25. A detailed application for this site is expected later in 2017 and we would like to be consulted on this. An assessment of how this development impacts the local road network and SRN should be included within this detailed application. It would be useful to be included in pre-application discussion either jointly with Enfield or directly with the proposed developers.</p> <p>Highways England have no immediate concerns with the Plan and therefore look forward to working with Enfield Council and neighbouring authorities as and when identified sites are brought forward for development.</p>	<p>Highways England will be consulted as specific development proposals are brought forward.</p>
12	A	Sport England		<p>The NPPF identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. It is important to positively plan for sport, recreation and healthier lifestyles by preventing the unnecessary loss of sports facilities and having an integrated approach to providing new housing, employment land and community facilities. It is therefore key that the Edmonton Leaside AAP reflects this aim to ensure it complies with National Planning Policy, particularly the NPPF paragraph 73, and Sport England’s objectives.</p>	<p>See more detailed responses below.</p>
12	B	Sport England	EL12	<p>Sport England along with Public Health England have launched our</p>	<p>Amend Policy EL12 to incorporate</p>

				<p>revised guidance, Active Design, which intends to inform the urban design of places, neighbourhoods, buildings, streets and active open spaces to promote sport and active lifestyles. The guide sets out ten principles to consider when designing places that would contribute to creating well designed healthy communities which has considerable synergy to many of the objectives and potential policies expressed in the AAP.</p> <p>Sport England recommend that these links between the AAP and Active Design are developed further and really drawn out in the AAP by having clear references to Active Design, its principles and the Active Design Checklist within the document.</p>	<p>reference to the Active Design guidance through inserting an additional bullet point to follow the 7th bullet:</p> <ul style="list-style-type: none"> • <u>Incorporate the principles from Sport England’s Active Design guidance;</u> <p>(see <i>Schedule of Minor Amendments</i>, item 31).</p>
12	C	Sport England		<p>It should be clear in any policy option that new sports facilities should be provided where there is a clear, robust and up-to-date evidence for it, such as a Playing Pitch Strategy (which the Council are currently in process of developing) or a Built Facility Strategy, and not merely when it is “appropriate” as stated in Policy EL9. In addition, these strategies would be able to inform the strategic direction of the AAP policies relating to sport facilities and playing pitches to ensure positive planning for sport, including directing which facilities need protecting and enhancing. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields</p> <p>Open spaces are key providers of playing pitches and also are important for informal participation in sport. In this regard, revitalising open spaces at Picketts Lock, as expressed in Policy EL20, should not result in the loss of playing pitches or playing field land unless the Playing Pitch Strategy clearly identifies this area is surplus for sport. Sport England would object to any loss of playing field or playing field unless such a surplus is identified as it would not be in accordance with the NPPF and Sport England’s playing field policy.</p>	<p>Amend Policy EL9 6th bullet point as follows:</p> <ul style="list-style-type: none"> • Where appropriate <u>there is evidence of need</u>, the provision of formal playing fields; <p>More detailed plans and specific planning proposals at Picketts Lock will be assessed against the policy framework. Sport England’s objection to the loss of any playing field at this location is noted, and the organisation would be consulted in the event of proposals coming forward.</p>

12	D	Sport England			<p>Sport England advises that schools are designed with community use in mind as facilities would be of benefit to the community and also maximise the use of land. Community use of schools should be secured by a Community Use Agreement (CUA) therefore Sport England strongly advise that the requirement for new (and existing) schools to have a CUA is written into the policy. In terms of the location of school playing fields and sports facilities, the APP states that these should be within 400m of the school. Sport England has concerns with this approach and would question how accessible this would be to all users of sports facilities and how well these facilities would function if the ancillary facilities, such as changing rooms, are a considerable distance from where sport would be played.</p>	<p>Policy EL5 requires community facilities, including schools, to support co-location and multi-functional uses. Since there is more than one method of achieving this outcome, a particular approach is not specified. The Council will seek further discussion with Sport England on this issue.</p> <p>The potential to allow up to 400m between the school and outdoor sports pitches is to recognise that, with limited space available at Meridian Water, the best provision of outdoor sports facilities may be on a separate site, albeit one within a short walking distance.</p>
12	E	Sport England	Policy EL13		<p>The residential development that is required would have an impact on existing sporting provision by increasing demand and developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up-to-date Sports Facilities Strategy, Playing Pitch Strategy or other relevant needs assessment.</p> <p>It is concerning that despite the focus on health and access to sports facilities and open space throughout the document Policy EL13 does not list sport, recreation and leisure facilities as infrastructure s.106 obligations would contribute towards. This policy, therefore, should be amended to include the reference to</p>	<p>The list of infrastructure provision in Policy EL13 is not exclusive and the Council may request contributions for sport, recreation and leisure facilities. Support for contributions for these uses is also provided in Enfield’s Section 106 SPD (2016).</p>

					such facilities so it is clear to developers that developer contributions and/or CIL would be used to fund sporting infrastructure to meet the community need.	
13	A	Christian Action Housing Association		-	Supports very strongly the ambition that is contained in this plan, particularly for the development of a new urban neighbourhood at Meridian Water, the emphasis on economic growth and the priorities given to connectivity. We also welcome the statements about water and green spaces and sustainable regeneration.	The Council welcomes that CAHA supports the ambitions for Meridian Water.
13	B	Christian Action Housing Association		-	<p>Welcome the comprehensive master planning approach that is been taken to the development of a significant new neighbourhood at Meridian Water, in particular the aspiration to provide around ten thousand new homes and emphasize the need for a significant proportion of these to be affordable at rents that are within the reach of those in receipt of lower incomes. This is essential if the development is to be successful economically and the employment opportunities that are associated with it are to be filled by people living locally.</p> <p>Note that the AAP anticipates that the housing zone at Meridian Water could support further homes in the surrounding area, beyond the boundary of the Edmonton Leaside AAP. We would strongly support this approach and believe that other housing associations operating in Enfield would take a similar view.</p>	Delivery of new homes is a key driver of the Meridian Water regeneration. Through providing better transport infrastructure, new jobs and a vastly improved environment, the development will support renewal and growth across the wider Edmonton area.
13	C	Christian Action Housing Association	Policy EL1	-	Strongly support the council's policy to seek 40% affordable housing units on new developments and that 70% of these should be social rent with 30% intermediate. We would urge the council to take a robust position in seeking to achieve these percentages, and indeed welcome the Mayor of London's ambition to achieve a proportion of affordable housing at 50%. We welcome the commitment under	Comment noted, although policy EL1 requires a minimum 35% affordable housing, rising to a higher proportion in line with improvements in viability.

					policy EL1 to avoiding poor spatial and design performance which requires buildings that do not negatively impact on the amenity of other buildings and the public realm in terms of light amenity. We believe there is a careful balance to be struck here in order to maximise the density of housing development that can be achieved without compromising the quality of housing and overall spatial design.	
13	D	Christian Action Housing Association	Policy EL3		Welcome the commitment to the new town centre delivering on-site affordable floor space provision for small and independent shops subject to viability. There will need to be a balance between the “normal suspects” in terms of retail space and the introduction of a variety that will enable a unique character to be developed at Meridian Water. This will include amenity uses such as restaurants and cafes of which we hope at least some will be independent from national chains.	Policy EL3 restricts shops frontage width to help support a mixed and variety town centre offer. Developing a café and restaurant culture in the area is also promoted by this policy.
13	E	Christian Action Housing Association	Policy EL7		Support the emphasis placed on improved rail services, bus interchange and public transport in general, together with the encouragement of cycling and walking as alternatives to car use. The level of development and the creation of a new neighbourhood at Meridian Water provides an opportunity to achieve a higher level of sustainability than is often found in more traditional areas of housing. If the new neighbourhood, from day one, has a high degree of rail and bus accessibility this will discourage the use of cars and will encourage user habits that are less reliant on the motor vehicle.	Achieving a modal shift towards active travel and public transport use is a key aim of the ELAAP and the regeneration at Meridian Water.
13	F	Christian Action Housing Association	EL9		Public Open Space & Recreational Areas - clearly an opportunity to create a high quality external environment for residents and visitors to Meridian Water and also some of the surrounding areas within Edmonton Leaside. The illustrations in the proposed submission indicate a high level of aspiration for this and we hope that this will	Improving the quality of, and access to green spaces, the network of waterways and leisure facilities is vital to the successful development of the area. This aim

					be achieved as development proceeds.	is support by numerous policies in the AAP.
13	G	Christian Action Housing Association	EL19, EL20		Revitalising Developed Areas at Picketts Lock - support the aspiration to deliver a large significant new development that will provide a destination attraction for Edmonton Leaside and beyond.	Policies EL19 and EL20 support making much better use of the Picketts Lock site.
13	H	Christian Action Housing Association	EL5		Other Infrastructure and Service Issues - Meridian Water will need investment and careful phasing of other facilities, most notably in the provision of education and health services. Urge that consideration of these is central to the phasing of the construction of new housing and that in particular new schools and additional school places are phased early enough in order to meet growing local needs as the population expands.	Policy EL5 on community facilities requires that growth of new residential areas ensures provision of sufficient education facilities at Meridian Water.
14	A	GL Hearn on behalf of Tesco Stores Ltd			Welcomes the Council's commitment to the comprehensive regeneration of the Meridian Opportunity Area, and the wider borough, through the preparation of the ELAAP.	The Council welcomes that Tesco supports the comprehensive regeneration aims of ELAAP.
14	B	GL Hearn on behalf of Tesco Stores Ltd			Tesco Stores Ltd. believe that the vision is positively prepared, justified, effective, consistent, and is therefore 'sound'.	Comment noted.
14	C	GL Hearn on behalf of Tesco Stores Ltd	Policy EL1		Welcome the Council's acknowledgement that the level of affordable housing that can be achieved within the Opportunity Area is subject to viability, and that a reduced number of affordable housing units are likely to be delivered during initial phases of development to address viability requirements. Also welcome the Council's acknowledgement on the role that Private Rented Sector homes can perform in meeting specific housing needs of some parts of the community, including affordability needs.	The Council is committed to delivering affordable homes at Meridian Water.
14	D	GL Hearn on	Policy EL1		The existing Tesco Extra at 1 Glover Road represents a key	

		behalf of Tesco Stores Ltd			<p>redevelopment site within the Opportunity Area. Indeed, the site occupies an important position on the proposed 'Causeway', the redevelopment of which will reinforce the role of Meridian Water and provide important linkages within the surrounding area.</p> <p>It is strongly contended that the residential-led redevelopment of the site will perform a significant role in the regeneration of the Opportunity Area. As such, in accordance with the objectives of Policy EL1 of the ELAAP and the London Plan (2016), it is considered that residential densities in excess of 1,100 habitable rooms per hectare are appropriate to reflect ambition of the site.</p>	<p>The ELAAP supports delivery of new homes and mixed uses at Meridian Water.</p> <p>The Council will seek discussions with Tesco on the potential for the store site to be redeveloped at a significantly higher density, in accordance with Local Plan and London Plan policy requirements and design guidance.</p>
14	E	GL Hearn on behalf of Tesco Stores Ltd	Policy EL1		<p>Given the important role that the Meridian Water Opportunity Area is to perform in meeting general housing need within the borough, it is important that the Council's housing mix requirements do not restrict the viability of key sites within the Opportunity Area. Therefore welcome the Council's acknowledgement that the level of 3+ family units may need to be reduced in initial phases to meet viability requirements.</p>	<p>Policy EL1 supports the development of Meridian Water as a mixed community, balancing the needs of a range of households.</p>
14	F	GL Hearn on behalf of Tesco Stores Ltd	Section 5.4 and Policy EL2		<p>Tesco is an important existing employer within the Meridian Water Opportunity Area providing a high number of employment opportunities in the area at present. Our client is keen to maintain their existing operations within the Opportunity Area, with opportunities to increase employment opportunities through the redevelopment of the existing Tesco Extra increasing employment and job growth. Therefore fully supportive of the Council's employment aim of 6,000 – 7,000 net jobs and feel they can contribute to delivering this target.</p>	<p>Increased employment opportunities are a key objective of the ELAAP, particularly at Meridian Water. Retail jobs provide a significant portion of the existing employment offer in the area, and will continue to contribute to this in the future.</p>
14	G	GL Hearn on behalf of Tesco Stores			<p>Welcome the commitment to creating a new town centre as part of the Meridian Water Opportunity Area. However the emerging Enfield Development Plan does not seek formal adoption of</p>	<p>The exact form and location of the Meridian Water town centre will be determined through further</p>

		Ltd		<p>Meridian Water as a designated centre. Given the important retail function of Meridian Water we contend that the emerging Enfield Development Plan should include the designation of Meridian Water (including the existing Tesco Extra) as a retail centre.</p> <p>Policy EL3 suggests that shop frontage within the proposed town centre should not be more than 6-8 metres in width. In this regard whilst Tesco supports the Council’s vision to create a ‘high street’, providing a variety of retail uses to create a vibrant and diverse centre, concerned that this objective is not consistent in meeting retail need in full. Indeed, there is demand for the continued provision of large format retail stores within the Meridian Water Opportunity Area. Our client would therefore welcome the opportunity to work proactively with the Council in preparing options of the redevelopment of the site to meeting the Council’s objectives whilst ensuring retail needs continue to be met.</p> <p>While Tesco welcomes the objectives of Policy EL3 of the ELAAP in that they seek to enhance the retail offer within the Opportunity Area, with a new town centre to be located along the proposed Causeway, Tesco would like to work with the Council in relation to the character of the proposed town centre.</p>	<p>detailed masterplan phasing work, designation at this stage would be premature. The existing retail at Meridian Water (Tesco, Ikea and Ravenside Retail Park) is not included as part of the new centre floorspace as the Council wishes to develop a diverse centre which consists of smaller, mixed units. Limiting the shopfront width is one method to achieving this outcome, which would be undermined if a disproportionate quantum of new floorspace at Meridian Water were to be absorbed within a single large retail store.</p> <p>The Council will work with Tesco to incorporate the store site as an important and positive contribution to the Causeway route and this area of Meridian Water.</p>
14	H	GL Hearn on behalf of Tesco Stores Ltd		<p>Tesco supports the implementation of the Causeway to maximise connectivity across the Meridian Water Opportunity Area. The Causeway will start at the junction of the existing Glover Drive with the alignment of Glover Drive retained to serve the existing Tesco and Ikea stores, ensuring that the existing Tesco Extra can remain operational. Will work with the Council on how the site can be delivered to ensure a high quality design and density.</p>	<p>The Council will seek to discuss delivery of the Causeway with stakeholders, including landowners.</p>
14	I	GL Hearn on		<p>Welcome the Council’s ongoing commitment to the delivery of</p>	<p>The accessibility of the 1 Glover</p>

		behalf of Tesco Stores Ltd			<p>Cross Rail 2 and the new Meridian Water Railway Station. Would like clarification regarding the delivery of Cross Rail 2, and the implications on the delivery of the mixed use redevelopment of the existing Tesco Extra at 1 Glover Drive and would welcome the opportunity to engage further with the Council and TfL.</p>	<p>Drive site to the new Meridian Water station would make this suitable for higher density, mixed use development, subject to appropriate design. Progress on Crossrail 2 is subject to the Government finalising commitment. The Council will engage with Tesco to consider potential options for regeneration of this site.</p>
14	J	GL Hearn on behalf of Tesco Stores Ltd			<p>Tesco is keen to work with the Council to identify fundamental improvements that could be implemented to the design of the car park to contribute to sustainable development. It is noted that with the new Meridian Water Railway Station and improved accessibility the level of car parking required will reduce. Our client therefore looks forward to working with the Council to explore design options for incorporating a rationalised car park in a sustainable way and improving the urban grain of the Meridian Water Opportunity Area.</p> <p>Welcome the mix of uses expected in the Meridian Water Opportunity Area, including commercial and non-residential uses on ground floor and lower floor levels, with residential on high floors. Supportive of the high quality and high density of development required, ensuring the viability of major infrastructure required by the development.</p> <p>Will work with the Council on producing a well-thought out design proposal for the site to ensure an appropriate level of residential amenity is achieved throughout the site.</p> <p>Strongly contended that the Tesco site represents an appropriate</p>	<p>The Council will work with Tesco to explore how better use can be made of this site in the context of transformational regeneration.</p> <p>Comment noted.</p> <p>The acceptability of tall buildings at this location will be dependent on numerous urban design factors, including set out in Policy EL11, Part C. The Council will engage with Tesco to consider potential</p>

					location for the delivery of a 'tall building' due to the improved transport infrastructure proposed and the increased capacity this will provide for Meridian Water.	approaches to regeneration of this site.
14	K	GL Hearn on behalf of Tesco Stores Ltd	Section 14.4 Figure 14.1		Support Phase 1 of development as this will increase accessibility to the Meridian Water Opportunity Area as a whole and specifically Tesco's site. However, Tesco's site is proposed to come forward as Phase 3 of the Meridian Water Opportunity Area. Tesco's site is available, achievable and deliverable. In accordance with the NPPF, the site is deliverable as it is available now, in a sustainable location and achievable in that housing can be delivered on site viably within the next five years. The site is in a location where no early infrastructure is required for the site to come forward for development and therefore early delivery of units to achieve this target could be provided. It is not encumbered by any further transport infrastructure needs to start delivering sustainable development. Therefore, it is urged that the Council consider the opportunity for the early delivery of the redevelopment of the existing Tesco Extra within the phasing of the Meridian Water development.	Figure 14.1 provides indicative zones only, with the AAP setting a flexible zonal approach to development. The Council will work with Tesco Stores Ltd to establish how this area of Meridian Water can most effectively deliver the optimum regeneration.
15	A	Barratt Homes	EL1		<p>Part A: Affordable Housing Recognise the policy approach towards 35% minimum affordable housing at Meridian Water, but to be consistent with National and Regional Policy, it would be sound to ensure that the consideration of viability forms part of the consideration of delivery (NPPF paragraph 173).</p> <p>Support the recognition that due to site remediation costs and low property values, viability requirements for development proposals may reduce the proportion of affordable housing below the Council's adopted policy. This however may not simply be across</p>	<p>The 35% affordable housing is a position established by the Mayor of London - the Draft London Plan does not require a viability assessment for affordable housing provision at this level.</p> <p>The Council expects viability to rise as the development builds-out due to significant investment and improvements in accessibility,</p>

					<p>“initial phases” as all phases will incur these constraints and therefore reference to “initial phases” should be removed.</p> <p>Part B: Capacity for Housing</p> <p>Welcome reference to the delivery of 10,000 new homes, albeit consider that this should be a minimum target.</p> <p>Part C: Housing Mix</p> <p>The policy requires “initial phases” of Meridian Water to deliver 25%+3 units. This should be subject to viability.</p>	<p>supporting facilities and the quality of the environment.</p> <p>The number of potential new homes referenced in Policy EL1 is a possible outcome, based on the evidence base modelling.</p> <p>Providing a range of housing sizes is important to ensuring a mixed and integrated development. 25% 3+ bedroom homes is a minimum.</p>
15	B	Barratt Homes	EL2		<p>Support the removal of the Strategic Industrial Location (SIL) designation from the Harbet Road Industrial Estate and the Locally Significant Industrial Site (LSIS) designation from the southern portion of Montagu Road Industrial Estate which lies within the Meridian Water boundary. This is set out at paragraph 5.4.11 and illustrated at Figure 6.1. For clarity this declassification should be referenced within Policy EL2 itself, given its fundamental role to the future regeneration of Meridian Water.</p>	<p>The ELAAP document establishes the new SIL and LSIS boundaries through Figure 6.1, and the accompanying ELAAP Policies Map. Specific reference to the declassification is not required in Policy EL2.</p>
15	C	Barratt Homes	EL3		<p>Support the designation of a new town centre at Meridian Water. The London Plan defines a District Centre as one with c.10,000m² - 50,000m² of floorspace (and a local centre with 500m²). Given the existing retail floorspace on site (Tesco and IKEA) the new centre will fall within the District Centre definition and should be defined as such.</p> <p>The policy states that where proposals comprise greater than 2,000m² (taking into account existing and extant planning permissions) the applicant must demonstrate evidence that there would be no adverse effect on neighbouring centres and that the</p>	<p>The existing ‘large box’ retail units are not classified within a town centre designation. Including these units would negatively affect the ability to promote a diverse and vibrant new town centre at Meridian Water.</p> <p>The Council will seek further discussions on the Policy EL3 text</p>

					<p>proposal is in proportion to the growth in local demand. The “cumulative test” of existing and extant planning permissions doesn’t define a specific search area, and therefore it might be more appropriate to have a fixed threshold. In addition “growth in local demand” is not a NPPF compliant term and is not effective. Restricting retail development to only meeting “growth” in retail expenditure is unduly restrictive and should be deleted. This approach would preclude retail proposals meeting existing shortfalls, or capturing expenditure that is leaking out of the catchment. Retail jobs are considered a fundamental component of Meridian Water at present (1,100 of the current 2,600 Meridian Water employees) and for the future growth in jobs. Paragraph 5.4.10 confirms that Retail (A use class) jobs will comprise 6% of the 6,000 proposed. These jobs could be compromised with a “growth only” retail policy.</p>	<p>to ensure clarity in terms of cumulative provision restrictions, and that growth in retail space must be proportionate to the growth in local demand.</p>
15	D	Barratt Homes	Para 5.11		<p>Paragraph 1.3.1 states that the “Spatial Framework demonstrates both a vision and a potential way to deliver a high quality new mixed-use neighbourhood in Meridian Water.” Barratt Homes supports this approach. Paragraph 5.11.1 is rather more prescriptive and states that “Guidance on the Council’s spatial expectations is provided in the Meridian Water Spatial Framework and Meridian Water Spatial Scenario Testing documents”. Consider the approach within paragraph 1.3.1 to be correct as it allows for flexibility.</p>	<p>The Council will make amendments to paragraph 5.11.1 as set out in the Schedule of Minor Amendments, item no. 30.</p>
15	E	Barratt Homes	Policy EL11		<p>Requires buildings to “conform to a height-to-width ratio appropriate for the street, with an aspect ratio of 1:1 to 1:1.5” and “Ensure the massing and orientation of residential blocks allows direct sunlight penetration into at least 70% of shared open space”. This appears to be an overly restrictive policy for such a large regeneration project, and should be caveated with “where practical”.</p>	<p>The Council will seek further discussion to ensure the design requirements for height to width ratio, set out in Policy EL11, are appropriate and proportionate.</p>

15	F	Barratt Homes	Policy EL15		Barratt Homes supports the removal of the Strategic Industrial Location (SIL) designation from the Harbet Road Industrial Estate as set out at paragraph 5.4.11 and illustrated at Figure 6.1. For clarity this deallocation should be referenced within Policy EL15 itself, given it is fundamental to the future regeneration of Meridian Water. Note that the declassification of the southern portion of Montagu Road Industrial Estate which lies within the Meridian Water boundary Locally Significant Industrial Site (LSIS) is referred to.	The ELAAP document establishes the new SIL and LSIS boundaries through Figure 6.1, and the accompanying ELAAP Policies Map. Specific reference to the declassification is not required in Policy EL15.
15	G	Barratt Homes	Para 14.4.5		Support Figure 14.1 which identifies “indicative zones”. However Paragraph 14.4.5 states that the “AAP sets a flexible framework for phasing ... to enable phases of development to come forward”. Do not consider that the AAP should set any form of phasing for this significant redevelopment due to the complexity and numerous factors which will influence the final phasing of delivery. Remove first sentence of paragraph 14.4.5.	Figure 14.1 provides indicative zones only, with the AAP setting a flexible zonal approach to development. The Council will work with stakeholders to establish how Meridian Water can most effectively deliver the optimum regeneration.
16	A	IKEA PI Ltd	Para 5.4.8 – 5.4.10		The Plan does not adequately acknowledge the valuable contribution retailers make towards employment or protection of existing businesses. Suggest amendment to paragraph 5.4.9: <u>Additionally, the uses supporting residential development will result in hundreds of new FTE jobs being created, mainly in retail and education, but also in the health, transport and leisure sectors. It is considered that job creation in the retail sector will continue to make a valuable contribution towards employment and economic growth in Edmonton</u>	The Council will make amendments to paragraph 5.4.9 as set out in the <i>Schedule of Minor Amendments</i> , item no. 16, to reflect the importance of existing retail jobs. Job creation will be in a variety of sectors, so additional emphasis on retail is not required.
16	B	IKEA PI Ltd	Policy EL2		Requires consideration of potential impact on existing businesses	

				<p>and their operations. Need to consider impact on servicing accesses and visitors. Insufficient acknowledgement of value of existing retailers and contribution to local employment. Active frontage on the Causeway has the potential to conflict with IKEA’s operation and access arrangements. Suggest additional bullet point within policy EL2:</p> <p><u>The growth of existing retail businesses to expand their operations and provide additional job opportunities</u></p>	<p>The Council will seek further discussion with IKEA on the wording of Policy EL2 in relation to existing retail operators.</p>
16	C	IKEA PI Ltd	<p>Policy EL3 Para 5.5.1 – 5.5.8</p>	<p>IKEA does not object to the promotion of a local centre in the vicinity of the store however redevelopment could only occur if appropriate parking and access provisions were satisfactorily protected for the store.</p> <p>Careful consideration needed regarding the road layout of the Causeway and impact on IKEA’s operation</p> <p>The market will influence the relative size of each unit and element of flexibility over the width of shop frontages would be more realistic</p> <p>The alignment of the Causeway and specific siting/mix of uses will be the subject of outline applications</p> <p>Suggest sentence to be included at the end of Policy EL3 to Read:</p> <p><u>The development of Meridian Water Town Centre must not jeopardise the existing operations of businesses in Meridian Water, including their access, servicing arrangements and parking provision</u></p>	<p>Further work will be required during detailed master planning on phases and development proposals to ensure access and parking for the town centre uses meet the needs of existing operators and planned new uses.</p> <p>The ELAAP encourages a diverse mix of shops through the restriction on length of frontage. Double frontage allows some flexibility, so long as they are separated by a minimum of two single frontages.</p> <p>The Council will seek further discussion with IKEA on the wording of Policy EL3 in relation to existing retail operators.</p>

16	D	IKEA PI Ltd	Policy EL5 5.7.1 – 5.7.6	<p>AAP seeks to deliver a range of community facilities to be easily accessible. If not privately funded, it will be important to ensure this infrastructure which seeks to provide benefits to the area will be delivered by CIL.</p> <p>A better understanding of the relationship between CIL and proposed Section 106 obligations is required to ensure that it does not affect viability and hinder regeneration of this area</p> <p>It is considered that Policy EL5 should identify the mechanism for delivery</p> <p>It will also be important to ensure funding and delivery of infrastructure/community facilities is spread across the complete Masterplan area</p> <p>There will also need to be an equalisation of values to enable public spaces and community facilities which are required to enable the regeneration to be delivered</p>	<p>CIL expenditure is defined by the Regulation 123 list, which does not include the community facilities described by Policy EL5.</p> <p>Infrastructure and the S106 approach are set out in Policy EL13.</p> <p>The Council will seek further discussion with IKEA on these matters relating to funding and delivery of infrastructure.</p>
16	E	IKEA PI Ltd	Policy EL6: 5.8.1 – 5.8.7	<p>Route is very prescriptive but insufficient work has been undertaken to demonstrate it will serve existing operators and proposed development</p> <p>Further detail is required as to the reconfiguration of Glover Drive and the layout of the highway in respect of Segment 1 of the Causeway (Section 5.8.7).</p> <p>It is imperative that the reconfiguration to accommodate cycle lanes, pavements and landscaping does not have an impact on the current operations of IKEA</p> <p>No references to the need to serve and protect existing operators. Policy should highlight that all proposals will need to demonstrate</p>	<p>The AAP safeguards the Causeway route to ensure the land is protected from other forms of development. Further work will be required during detailed site investigation; phased master planning; and development proposals to ensure the layout, configuration and capacity meets the needs of existing operators and planned new uses. The planning</p>

				<p>how they are compatible with existing neighbouring uses and will not impact upon their operation</p> <p>Need to consider impact on both vehicular access arrangements and safe pedestrian access for customers and staff</p> <p>Insufficient assessment or explanation of whether the Causeway will have the capacity to accommodate the new homes and jobs proposed in addition to the existing traffic on the highway network. There is currently a lack of technical modelling information presented to demonstrate the deliverability of the proposals</p> <p>Essential that junction capacity assessments, including detailed junction designs and predicted traffic generation flows for the proposed development are undertaken before the AAP is adopted. This is necessary to provide more confidence with regard to the validity of the transport strategy within the Meridian Water Masterplan.</p> <p>Greater flexibility required including consideration of alternative routes</p> <p>Emphasis is placed on the provision of public spaces and public realm without sufficient consideration of the relationship with and impact on existing operators or deliverability. IKEA has a unique format and configuration. The relationship between car parking and the store's entrance is essential, particularly having regard to the nature of the products, customer movements etc. Links to the store would be affected as direct access from the North Circular Road via Argon Road would be impacted, potentially forcing visitors to the store to navigate a series of junctions along Montagu Road and Conduit Lane</p>	<p>work will also need to consider the safe interaction of pedestrians, cyclists and motor vehicles.</p> <p>Detailed road network and junction designs, along with capacity assessments, will be carried out as development proposals and detailed masterplans are brought forward. The AAP is a higher-level document and it would be premature to establish such specific network plans and evidence at this stage.</p> <p>The route has been established by the parameter set out in paragraphs 5.8.5 to 5.8.10.</p> <p>The Council will seek further</p>
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				<p>Imperative that the main vehicular accesses to the store are retained to prevent this from prejudicing the continued successful operation of the store and to ensure that the entrance is identified clearly from the road and from the car park access</p> <p>Great emphasis is placed on prioritisation for pedestrians. IKEA requires assurances of how the road network will operate and how it will serve their operation which requires customers to pass the front of the store before entering the site, with a clear orientation of where the entrance is. IKEA acknowledge that the Meridian Water Masterplan indicatively shows how this may work but there is not enough detail</p> <p>IKEA are very keen to work with the authority and welcome confirmation the authority intend to undertake further modelling and are happy to meet. However it is considered that the proposed arrangement currently prejudice IKEA's operation.</p> <p>Consider that the following bullet points of Policy EL6 Part A are amended to read:</p> <p><u>- support the delivery of a continuous link route across Meridian Water and beyond without jeopardising the existing accesses to businesses located on the Causeway route;</u> <u>- Incorporate the Causeway in the design, without preventing the successful operation of existing access arrangements.</u></p> <p>The following bullet points of Policy EL6 Part B should be amended to read:</p> <p><u>- Seek to provide active frontages to the Causeway on both sides if possible;</u> <u>- Try to prevent any parking between building frontages and the Causeway apart from on-street single-width parking</u></p>	<p>discussions with IKEA to consider how the ELAAP addresses issues including car parking, access and store aspect.</p> <p>The Council will seek further discussion with IKEA on the proposed wording.</p>
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					to account for existing businesses that are required to provide surface level car parking with the curtilage of their sites	
16	F	IKEA PI Ltd	Policy EL10		<p>Consideration needs to be given to the existing IKEA store, its surface level car parking, and relationship to adjacent sites and proposed land uses</p> <p>The existing car parking operates nearly at capacity during the store’s busiest trading periods and additional parking spaces would be needed in the future for the car park to operate within capacity. However the proposed alignment of the Causeway passes within the immediate surrounding area of the store and proposes changes to the current surface customer car park located to the northeast of the store. This would require the removal of a significant area of the car park and its relocation to the south and west areas of the store (within the site boundary)</p> <p>Detailed work will be required to consider how this affects the operation of the store as well as the relationship between the spaces provided and the store’s entrance</p> <p>The impact of intensification of land uses upon the operation of IKEA must be considered</p> <p>Active frontage on the Causeway has the potential of conflicting with IKEA’s operation and access arrangements</p> <p>The wording of the policy is too prescriptive. Suggested amendment to paragraph 2 Policy EL10 as follows: - Development proposals and supplementary planning documents are “encouraged to” instead of “expected to”</p>	<p>Making far more efficient use of the land at Meridian Water is vital to the success of this area. Existing areas of surface car parking are wasteful of space and the AAP evidence base establishes the high number of homes and jobs which can be achieved, based on the assumption of making better use of these car parks.</p> <p>Policy EL6 requires active frontages along the Causeway as development proposals and SPDs are brought forward – this approach will provide a move towards a greatly improved environment for new residents, workers and visitors. Likewise Policy EL10 is important to guiding transformational change across Meridian Water and the Council does not wish to weaken the wording.</p>
16	G	IKEA PI Ltd	Policy EL11		Land is in mixed ownership and policy requirement for	

				<p>modification and adaptation of existing buildings and layout is prescriptive</p> <p>The market will influence the nature of the uses and the phasing of the development</p> <p>Policy is too prescriptive in requiring the adaptations of buildings and layouts. Regeneration of IKEA’s site must come forward if it makes business sense to IKEA. Request amended wording to bullet point 3 of Policy EL11 to read:</p> <p><i>- Consider the modification and adaptation of buildings and layout where possible, including those of existing retail operators, so that they support comprehensive regeneration</i></p>	<p>Policy EL11 seeks to guide transformational change through the design and configuration of buildings and layouts. Developing Meridian Water will require some level of design accommodation by the existing retail operators, and this policy provides for this.</p>
16	H	IKEA PI Ltd	Policy EL13	See comments to EL5	See response to EL5 above.
16	I	IKEA PI Ltd	Policy EL21 Figure 11.1 Supporting Text Section 11	<p>Whilst it is important to promote pedestrian and cycle routes there must be recognition that this area serves substantial existing operators who, whilst supporting modal shift to public transport, principally rely on cars and that the AAP is promoting substantial employment and residential development. Insufficient transport assessments have been undertaken to establish if the proposals can support existing and future operators.</p> <p>See comments to EL6</p>	<p>Detailed movement and transport capacity assessments, will be carried out as development proposals and detailed masterplans are brought forward. It would be premature to establish such specific evidence at this stage.</p>
16	J	IKEA PI Ltd	Policy EL22:	<p>See comments to EL6</p> <p>Policy EL22 does not acknowledge the existing arrangements on Glover Drive and how they might be affected by the Causeway. Suggest wording change of bullet point 3 to:</p>	<p>Detailed road network and junction designs, along with capacity assessments, will be carried out as development proposals and detailed masterplans are brought forward. It would be premature to</p>

					- <i>provision of pedestrian and cycle facilities <u>that integrate within the existing highway network</u></i>	establish such specific network plans and evidence at this stage.
16	K	IKEA PI Ltd	Policy EL23		Requires consideration of potential impact on IKEA customers and servicing accesses. Need to consider impact on both vehicular access arrangements and safe customer pedestrian access. Insufficient assessment or explanation of how it will serve proposed future development and capacity on surrounding network. Greater flexibility required including consideration of alternative routes.	Detailed road network and junction designs, along with capacity assessments, will be carried out as development proposals and detailed masterplans are brought forward. It would be premature to establish such specific network plans and evidence at this stage.
16	L	IKEA PI Ltd	Section 11.8		As above the authority must ensure that there is appropriate car parking to serve existing and future development.	Section 11.8 confirms the need to have regard to London Plan and DMD parking standards, and to ensure that for new developments parking functions satisfactorily.
16	M	IKEA PI Ltd	Section 11.9		This section acknowledges the need for modelling. Insufficient assessments have been undertaken to support the proposed allocations and road proposals. This is exacerbated as the schemes and in particular the road alignments are too prescriptive. The policies require greater flexibility.	Policy EL25 is worded to provide a flexible approach to design of the road network. The Council will seek discussion with IKEA to consider further.
16	N	IKEA PI Ltd	Policy EL25		See comments to EL6	See response to EL6 above.
16	O	IKEA PI Ltd	Part D		As outlined in sections above the land is in multiple ownership. It is important to understand how the authority anticipates that the various phases will be delivered, recognising the requirement for flexibility Equalisation of values to enable delivery of facilities required to enable the wider redevelopment.	Section D provides indicative phasing, acknowledging that Meridian Water is likely to develop at different rates in different areas. Ongoing design and masterplan work will provide a more focused phasing plan.

					<p>How will community facilities will be funded, phased and delivered?</p> <p>How will impacts upon existing businesses be considered?</p> <p>How will existing businesses be maintained during construction?</p>	<p>Delivery of community facilities will be in line with the quantum of development, as established by Policy EL5.</p>
17	A	Healthwatch Enfield	Objectives		<p>Enfield Council should be much more ambitious for the health and wellbeing of the local residents of Edmonton Leaside; we would like to see a new Objective of 'Enhanced Health and Wellbeing' added to the final Area Action Plan, in order to give this matter appropriate weight and to support Enfield Health and Wellbeing Board priorities.</p> <p>It is not clear that the proposed Area Action Plan has adequately captured the health and wellbeing benefits – including mental health resilience - of sufficient green space, restrictions on unhealthy retail outlets, environmental encouragement to walk or cycle, disincentives to drive, the need for clean air, the need for community spaces for social interaction, etc. We believe that a new Objective of Enhanced Health and Wellbeing could enable the priorities that the Health and Wellbeing Board has identified to be more fully and specifically addressed.</p>	<p>Health and wellbeing is integrated throughout the Plan, including within the objectives and policies.</p> <p>Through a number of policies the AAP requires accessible and high-quality spaces, including EL9 Leisure Facilities and Open Space at Meridian Water; EL12 Public Space at Meridian Water; EL19 Infrastructure Delivery in Meridian Water; EL20 Revitalising Open Space at Picketts Lock; EL27 Watercourses at Edmonton Leaside, and EL28 New and Existing Green Spaces.</p>
17	B	Healthwatch Enfield	Objectives		<p>The Enhanced Health and Wellbeing Objective should specify that the methodology for developing and creating spaces for services in the community, including primary care, should be co-designed with local people.</p> <p>Adopting Transport for London's Healthy Streets Approach should be a minimum standard, with additional effort being made to focus on involving people from the local area in co-designing services and</p>	<p>Any planning proposals for community spaces would be required to undergo public consultation as a matter of course. See response to TfL comments below – the Council will seek discussion with TfL on reference to the 'Healthy Streets Approach'.</p>

					spaces that many existing residents will also use.	
17	C	Healthwatch Enfield	General		<p>The concerns of local people about current access to GPs, and also the changing pattern of delivery of health and care services, must be taken adequately into account in planning the timing and scale of primary care and other health and care services and support in the community.</p> <p>We strongly endorse the point made by NHS Enfield Clinical Commissioning Group (CCG) in their response to the 2015 draft Area Action Plan that any infrastructure created must not only be timely, but also flexible.</p>	Policy EL5 required that appropriate healthcare facilities are delivered in accessible locations; developments may be required to make financial contributions toward provision. The policy makes clear that accessibility is important, and that healthcare facilities should explore co-location and allow flexible access to services.
17	D	Healthwatch Enfield	General		We would also welcome your confirmation that a full health impact assessment either has been or will be carried out in good time to feed in to the development plans.	Health impact assessments will be carried out for development proposals as required.
18	A	Canal & River Trust	General		The Trust considers that the policies in the AAP set a largely sound framework for the development of Meridian Water as a place that recognises and supports the River Lee Navigation corridor's role as a key part of the public realm of the development.	The River Lee Navigation is a distinctive component of the area and provides a unique resource to support regeneration.
18	B	Canal & River Trust	Policy EL1		<p>We remain concerned that Policy EL1 section -</p> <p><i>Higher density development should be situated in areas with higher levels of accessibility to public transport and/ or where it can capitalise most appropriately on features such as views and open space</i></p> <p>- favours an approach to development that gives priority to views (largely private, we assume) from new residential buildings rather</p>	This element of Policy EL1, in terms of the need to locate in areas of high public transport accessibility, is simply reflecting the accepted approach to density, and which is set out in the London Plan. The policy does not seek to prioritise good views from the units for a particular tenure of housing.

					than the public views from the open spaces of the Lee Valley. These need to be taken into account in determining where high density development is appropriate. We suggest that this section of the policy is inconsistent with Policy 30 of the Council’s Core Strategy, which requires that “all developments and interventions in the public realm must be high quality and design-led, having special regard to their context”.	Good access to open space is a necessary factor in designing and locating residential developments. The design of any development must have regard to design factors, including Core Policy 30, and the design policies EL10, EL11 and EL12 of the ELAAP.
18	C	Canal & River Trust	EL2		<p>The policy should be corrected so that it refers to the “River Lee Navigation” rather than “Lee Navigation River”.</p> <p>We are unclear from the AAP whether the intention is to retain the re-purposed Meridian Works buildings over the long term. We recognise that the plans and images included in the “scenario testing” document are only indicative but we note that the retained buildings are shown within them. We support the principle of re-using these buildings in the short/medium term to create more active uses of the land adjacent to the River Lee Navigation. However, longer term, the retention of these buildings may make it more challenging to deliver a high quality public realm, particularly in a sensitive location alongside the proposed Causeway Bridge. We would want to give further consideration to this through masterplanning and development management stages of the development.</p>	<p>Update Policy EL2, 7th bullet point:</p> <p><i>‘Active frontages, especially along the Causeway, River Lee Navigation River and ...’</i></p> <p>The AAP does not provide this level of direction as to the future of these buildings - this will be addressed through more detailed masterplanning work.</p>
18	D	Canal & River Trust	EL3		Active frontages should support natural surveillance of the waterway corridor. They will, however, need to be carefully managed to avoid adverse impacts, such as uses spilling out onto the towpath.	Potentially adverse impact of waterside uses can be controlled through the use of planning conditions.
18	E	Canal & River Trust	EL4		The Ravenside Retail Park site will continue to represent a significant length of the canalside frontage within the Meridian	Within the Plan Ravenside Retail Park will continue in its existing

					Water development. Suggest that the vision for the site would be clearer if policy EL4 made it clear that improvements to the site's interaction with the River Lee Navigation corridor is a specific focus for this. We note that any development of the site would need to comply with policies EL10, EL12 and EL27 in any event.	use. Policy EL4 seeks to improve the public realm and linkages with other parts of Meridian Water. As per the comment, policies EL10, EL12 and EL27 support improvements to the interface between the retail park and waterway.
18	F	Canal & River Trust			<p>The proposed Causeway will cross the Canal & River Trust's property and an agreement will therefore be needed with us prior to its development. We welcome policy EL6's recognition of the need to work with partners and stakeholders.</p> <p>Whilst we have no objection to the safeguarding of a 16m corridor across the River Lee Navigation to deliver the bridge, we would suggest that the aspiration should be to deliver as narrow a structure as possible to minimise its impact on the Blue Ribbon Network. The spaces alongside bridges need to be carefully designed to ensure that they offer natural surveillance, as well as a good quality connection to the towpath for pedestrians and cyclists. Whilst it could be argued that this point is covered by policy EL10 and EL12, we suggest that this change would help to identify the area around the Causeway bridge as a particularly sensitive location.</p>	<p>Comment noted.</p> <p>The bridge design must be sufficient to carry the traffic requirements – further detailed assessment and design work will be carried out.</p> <p>The Council will seek further discussion with C&RT on the wording in policies EL10 and EL12 with regard to connectivity design aspects around the Causeway/ River Lee Navigation intersection.</p>
18	G	Canal & River Trust	EL8		<p>Welcome recognition of the need to work with C&RT to secure an integrated and sustainable approach to the management of development and flood risk. This should be considered alongside the design of new development to try to avoid conflict between different planning priorities.</p> <p>Subject to flood risk management, other safeguards to protect</p>	<p>The Council will engage with stakeholders such as the C&RT to manage flood risk. The Council will seek further discussion with C&RT on the wording in Policy EL8 and the potential for surface water</p>

					water quality and an agreement with the Trust, there may be opportunities for developments to drain surface water into the River Lee Navigation. We suggest that this could be recognised in the plan.	drainage into the River Lee Navigation.
18	H	Canal & River Trust	EL9		<p>Welcome the recognition in policy EL9 that Meridian Water has the potential to deliver a significant leisure offering, including for example... facilities for boating.</p> <p>Disappointing that the AAP no longer offers (appropriately qualified) support for the inclusion of new waterspaces within Meridian Water or the land adjacent, as this appeared to be a key part of the character of the previous development proposals. Policy EL9 supports, “where appropriate”, new wetland habitat... including boardwalks and pontoons to provide access. We would suggest that this should be extended to:</p> <p>“new waterspaces and wetland habitat”,</p> <p>whilst retaining the “where appropriate” caveat.</p> <p>Paragraph 5.10.6 of the AAP notes: <i>The potential of further areas of the Lee Valley Regional Park to the north, east and south of Meridian Water to contribute to the area’s open space requirement.</i> This could include the provision of new waterspaces, which are included within the definition of open space within the NPPF. Should be considered further through the masterplanning of the Meridian Water development.</p>	<p>Comment noted.</p> <p>Amend the text of Policy EL9, 8th bullet point: <i>‘Where appropriate, that new waterspaces and wetland habitat is incorporated, including ...’</i></p> <p>Masterplanning work for Meridian Water must ensure full use is made of the area’s water resources; provision of any new waterspaces within Meridian Water must be considered among other land use requirements.</p>
18	I	Canal & River Trust	EL10		The Trust welcomes the policy requirement for developments to “enable distinctive place-making by utilising the waterways as a defining feature of developments and ensure active frontages facing onto the River Lee Navigation”.	See the response to Policy EL1 above – any proposal seeking to

					As noted previously, we believe that some qualification to the following statement is required: 'Orientate building heights and layouts to take advantage of views along the Lee Valley' - see comments on EL1.	take advantage of views must also comply with other policy requirements, including accessibility and design context.
18	J	Canal & River Trust	EL11		<p>EL11 seeks to "maximise unobstructed long views from roof terraces". Suggest that this should also be an aspiration for key areas of the public realm to aid wayfinding throughout the site. The River Lee Navigation corridor offers the opportunity to deliver these long views on a north-south axis through the site. The built form should respect this but also avoid a sense of canyoning that could be caused by the "walls" of tall buildings that policy EL11 correctly seeks to avoid.</p> <p>Welcome the support in policy EL11 for tall buildings to need to include measures to mitigate wind and microclimate issues in their surroundings. This gives sufficient scope to ensure that the impact on the navigation is considered, consistent with London Plan policy 7.7.</p> <p>Note that policy EL11 seeks to "avoid overshadowing of adjacent buildings, especially towards principal rooms". It does not address the need to consider the overshadowing of the public realm. Whilst London Plan policy 7.7 does consider overshadowing more generally and would apply to the development (unless it is not retained in the forthcoming review of the London Plan), suggest this should be added to EL11 requirements.</p>	<p>The ELAAP provides broad design principles to guide development proposals and masterplans.</p> <p>Comment noted.</p> <p>The draft London Plan Policy D8 provides policy on this matter, requiring careful consideration that the impact of tall buildings does not compromise the sunlight penetration of open spaces.</p>
18	K	Canal & River Trust	EL12		C&RT considers that the Navigation (and its towpath) will become a key part of the Meridian Water public realm and should be a central consideration in the masterplanning and development management of the site.	

				<p>Welcome the support in EL12 for “leisure uses on and adjoining the water, where appropriate”. Given that the policy already includes the caveat “where appropriate”, we consider that the policy should be extended to give this qualified support to commercial (such as café, retail or trip boats, for example) and residential uses on the Navigation. These uses are supported, subject to certain criteria by adopted policy DM75. Policy EL27 of this AAP re-emphasises the support for residential moorings but not commercial. Both could contribute positively to a vibrant and active waterway corridor public realm in Meridian Water, as well as providing additional natural surveillance. Support for residential moorings may help the Council to meet any needs identified in an assessment under section 124 of the Housing & Planning Act and contribute to delivering the objectives of the London Mooring Strategy, currently being prepared by the Trust.</p> <p>Careful consideration of appearance, layout, scale and massing, amongst other design considerations, will be needed to ensure that the regeneration of Meridian Water makes the most of the Navigation as an important piece of public realm. These issues should be considered as part of the requirement in EL11 for development to have a “direct, positive and productive relationship with the public realm”. A master plan approach will be hugely beneficial in delivering this and we welcome the Council’s intention to do this (as set out in paragraph 14.1.3 and 14.5.3).</p> <p>Welcome the approach of encouraging active frontages and natural surveillance along the canal corridor. Whilst we recognise that the plans and images included in the AAP are indicative, we question why active frontages along the River Lee Navigation are not shown in the area to the SW of the waterway in figure 5.4.</p>	<p>As acknowledged, Policy EL12 provides support for commercial uses along the Navigation. The Council will seek discussion with C&RT on any Policy EL12 with regard to potential further wording, including on residential mooring.</p> <p>Comment noted. As stated in the response, specific design consideration should be carried out through more detailed masterplanning work.</p> <p>The locations shown in Figure 5.4 are indicative only and should not be considered as a final position.</p>
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18	L	Canal & River Trust	EL13		<p>Welcome the specific support for securing improvements to waterside public realm through planning obligations in EL13. The plan could also encourage applicants to include the waterside and waterway within the boundary of their sites, where relevant, to ensure that the public realm is planned, and improvements delivered, in a way that its integrated with the development. Other local planning authorities in London, such as the LLDC, adopt this approach.</p>	<p>The Council will need to understand more fully the implications of encouraging applicants to include waterside and waterway within the boundary of their site, and will seek further discussion with C&RT on Policy EL13.</p>
18	M	Canal & River Trust	EL21		<p>Welcome the requirement that “development proposals which include or are adjacent to Towpath Road and along the River Lee Navigation towpath must deliver significant improvements to the continuous north-south route for pedestrians and cyclists from Tottenham Hale, through Meridian Water, to Enfield Lock.</p>	<p>Comment noted.</p>
18	O	Canal & River Trust	EL22		<p>As with the Causeway Bridge, the Trust’s agreement will be required for a bridge in this location. Suggest that discussions on the bridge should begin in good time to ensure that our requirements as landowner can be factored into the scheme design and costing. Welcome the requirement for improved public realm to be delivered alongside schemes for new bridges.</p> <p>Suggest that the space below and alongside the NCR is an example of the type of under-bridge environment that should be avoided. It detracts from the quality of the Blue Ribbon Network, and the extent to which it provides an attractive sustainable travel route, in this part of the Lee Valley. Suggest that the AAP should, at least within the supporting text, include an action to improve this space, consistent with EL13 and EL21.</p>	<p>Detailed assessment and design work for bridging over the River Lee Navigation will include consultation with C&RT.</p> <p>The Council will seek further discussion with C&RT to clarify concerns on the under-bridge environment, and how the ELAAP could be used to avoid this.</p>
18	P	Canal & River Trust	EL24		<p>Suggest that the policy could go further by requiring that applications for developments adjacent to the Navigation above a suitable threshold submit a waterborne freight feasibility</p>	<p>The support for waterborne freight transport provided by Policy EL24 is considered to be sufficient and</p>

					<p>assessment for transporting demolition waste and construction materials.</p> <p>As with EL12, the policy should be extended to give support to commercial and residential uses on the Navigation, where appropriate.</p>	<p>proportional.</p> <p>The Council will seek further discussion with C&RT on Policy EL24 regarding wording around uses on the Navigation.</p>
18	Q	Canal & River Trust	EL26		<p>There may be opportunities to lay infrastructure to help deliver heat from the Lee Valley Heat Network (as well as other infrastructure) below the surface of the towpath of the River Lee Navigation, subject to agreement with the Trust.</p> <p>Any crossing of the Navigation will require the agreement of the Trust. The appearance and character of the Blue Ribbon Network would be best supported by integrating these into planned bridges, particularly the Causeway, or laying pipes under the Navigation.</p>	<p>Policy EL26 would provide support this approach to heat network infrastructure if required.</p> <p>A more detailed examination of the heat network infrastructure routes will be established though later work coordinated by Energetik – the Council’s heat network company.</p>
18	R	Canal & River Trust	EL27		<p>Consider that the policy provides a very good framework to ensure that the River Lee Navigation becomes a central part of the placemaking strategy for this area through masterplans and the development management process.</p> <p>EL27 currently states that: “Development proposals must protect and enhance habitats and biodiversity, through measures including softening of river channel edges”. On the Navigation, this may not be consistent with the other aims for the waterway set out in policy EL27 and the remainder of the plan. Suggest the words “where appropriate” should be added to the end of this point of the policy.</p> <p>We estimate that there is approximately 45MW of heating and cooling potential in our London waterways, which could supply approximately 24,000 homes in London. The technology required to</p>	<p>Comment noted.</p> <p>Update the wording of Policy EL27, 5th bullet point: <i>‘Development proposals must protect and enhance habitats and biodiversity, through measures including softening of river channel edges where appropriate.’</i></p> <p>The potential of energy transfer of heating or cooling is significant,</p>

					deliver cooling from canal and dock water is already successfully used in London. We welcome the requirements on EL27. The policy should also recognise the possibility of using the waterway for heating, especially prior to the establishment of the Lee Valley Heat Network or where it is inappropriate or not viable to connect to it. Suggest a lower threshold for testing the feasibility of using canal water for heating and cooling could even be applied to allow for changes in technology and viability over the lifetime of the plan.	and the Council will seek further discussion with C&RT on Policy EL27 regarding use of waterways to provide cooling or heating.
18	S	Canal & River Trust	EL28		The NPPF definition of open space includes waterspaces. As such, the policy would support their development, where appropriate, within this part of the Lee Valley. We suggest that such opportunities should be considered further, with the Trust, as part of more detailed masterplanning work.	As stated in the response, further consideration of additional waterspaces should be carried out through more detailed masterplanning work.
19	A	NLWA	Multiple locations		There is no reference to the recently granted Development Consent Order (DCO) in the AAP. We believe the DCO takes precedence over local planning policy, so it is important that this is reflected in the AAP in every relevant paragraph.	Comment noted and addressed in further detail below. Also see the Schedule of Minor Amendments items 49, 51 and 54.
19	B	NLWA	Multiple locations		Photographs throughout the document are out of date and should be refreshed. E.g. Meridian Water aerial view on page 21, the view of Ravenside Retail Park on page 52, Angel Road Retail Park on pages 95 and 97 and the photograph of gas holders on page 131.	Comment noted – use of updated images will be sought.
19	C	NLWA	Para. 1.3.1		The diagram in para. 1.3.1 on page 8 does not refer to the Edmonton EcoPark Planning Brief SPD – propose amending the diagram to do so.	The diagram on page 8 shows documents directly part of the ELAAP preparation process; the EcoPark SPD is referenced sufficiently in other parts of the document.

19	D	NLWA	Para. 2.1.10		Amend paragraph to refer to the potential provision of heat for a decentralised energy network as there is not yet a formal agreement to supply heat from the EcoPark. The potential nature of the provision of heat energy should be repeated throughout the document.	Amend paragraph 2.1.10 5 th paragraph: <i>'Edmonton Eco Park – the redevelopment of the site to provide the next generation of waste services and expected additional community benefits through the provision of heat for a decentralised heat network;'</i>
19	E	NLWA	EL12		The policy should consider encouraging ' recycling on the go ' unless this is properly addressed in the other policy documents that will have force in the AAP area. This could be implemented through the provision of separate street bins for items of waste that can be recycled and those that cannot.	Policy EL12 already includes a requirement for waste separation bins. The Council will seek further discussion with NLWA on Policy EL12 to clarify.
19	F	NLWA	Figure 8.1 Figure 10.1		Both diagrams lack a key to explain the symbols used. Reference to the granting of the DCO should be included.	Update the AAP to include keys for Figure 8.1 and Figure 10.1. The DCO will be referenced in the text but does not require adding to the key.
19	G	NLWA	Paras. 12.1.3 and 12.1.7		This paragraph states that developments must make full use of carbon saving technologies and approaches including the use of solar panels and ground source heat pumps as well as the Council's intention to seek the highest BREEAM scores for new developments. Para. 12.1.7 raises the potential to use waterways to cool buildings by using canal water and heat exchangers. These requirements may impose unreasonable technical or financial burdens on developers. These features should be desirable rather than a requirement and could consider requiring developers to demonstrate that they have been given full consideration in any future proposals.	The Council will amend paragraph 12.1.3 as set out in the <i>Schedule of Minor Amendments</i> , item no. 40, to provide consistency with other Plan documents. Paragraph 12.1.7 encourages the use of heat exchange technology using the canal water, but does not require it.

19	H	NLWA	Chapter 8 and Policy EL17		The proposed development at the EcoPark, authorised by the DCO, includes the design outline and BREEAM levels which were consulted on in detail as part of the application process. The AAP should specifically acknowledge that the standards that will be applied to the DCO development will be as set out in the DCO and associated certified documentation, and that additional standards will not be applied. The certified documentation is set out in Article 33 of the DCO, and will include the Environmental Statement and the Design Code Principles which were reviewed in detail by LB Enfield during the application process.	The referencing of the DCO through Chapter 8 and Policy EL17 requires further discussion between the Council and the NLWA.
19	I	NLWA	Para. 12.3.3		Revise text to refer to the DCO and that the DCO takes precedence over any local planning policy.	Delete this paragraph as the text can be removed without reducing the effectiveness of the ELAAP position on the DEN.
19	J	NLWA	Paras. 12.3.4 and 12.3.6		The text should make clear that these paragraphs refer to the energy centre proposed by the Lee Valley Heat Network and not the future Energy Recovery Facility that is permitted by the grant of the DCO. Any further ambiguities in the AAP should be clarified too.	See the <i>ELAAP Schedule of Minor Amendments</i> for amendments to paragraphs 12.3.4 and 12.3.6. Clarification between the Lee Valley Heat Network and Energy Recovery Facility is added to paragraph 12.3.5 (see below).
19	K	NLWA	Para 12.3.5		The consent described in this paragraph has now been granted and the text should be updated to reflect this. The text should also be corrected as follows: 'North London Waste Management Plan'. The DCO is not part of the North London Waste Plan and this incorrect statement should be corrected.	See the <i>ELAAP Schedule of Minor Amendments</i> for amendments to paragraph 12.3.5.
19	L	NLWA	Para 12.3.7		Propose that paragraph 12.3.7 and EL26 Part B are removed as	See the <i>ELAAP Schedule of Minor</i>

			EL26 Part B		these matters are subject to the DCO which has already been granted and ongoing negotiations about commercial terms for a lease agreement with the Lee Valley Heat Network. Part D on page 139 must be subject to the terms of the DCO and any supply of energy from the existing energy from waste facility or the planned Energy Recovery Facility is subject to commercial terms which are currently being negotiated and cannot be overridden by this plan. It would also be inappropriate for the AAP to control the layout of private roads within the EcoPark site.	<i>Amendments</i> for amendments to paragraph 12.3.7 and Policy EL26 Part B.
20	M	NLWA	Para. 12.3.10		It is not clear what justifies the precedence of the Decentralised Energy Network SPD over the Mayor of London's Standards and this should be fully explained.	Update paragraph 12.3.10: 'Should there be a conflict between the DEN SPD specifications and the Mayor of London's standards then the DEN SPD specifications take precedence.'
20	A	Newell projects on behalf of Arriva plc			ARRIVA's over-riding concern is for the continuity of its operations from its existing facility, until a suitably-located alternative, of sufficient capacity, and obtained on appropriate terms, can be fully provided and commissioned. Should this objective fail to be achieved then it would be extremely disadvantageous to the continuity of Bus operations in the Borough and beyond. ARRIVA requires the Bus Facility to be retained in the immediate locality of the existing Facility, and a capacity of 200 buses is in order (the current Depot houses around 150), including a Bus Engineering Facility. It is logical that, in terms of operational planning for Bus Public Transport, the lead-in time for any move of Bus Facility be of suitable and sufficient length. The question of relocation of the Facility not only affects the Facility itself, but, as	Enfield Council will continue to discuss the Harbet Road bus depot options with key stakeholders, including Arriva, as to how this facility can be relocated while maintaining the operation capacity. The Council will seek further discussion with Arriva on the ELLAAP with regard to the bus depot site.

					the Borough is fully aware, other Facilities in neighbouring Boroughs. TfL has already commented to the GLA on the matter, and there is no difference between the TfL position, and that of ARRIVA.	
21	A	North Middx Hospital – NHS Trust			<p>Concerned that there is no consideration of the potential impact on local secondary health care and mental health care provision from the increase in population.</p> <p>While consideration and approval are given for this regeneration scheme, further work is carried out to scope the increased demand placed on local secondary health care and mental health care to ensure that provision is increased in a timely and appropriate way to ensure the health and well-being of the current and future population.</p> <p>Regarding plans for the new primary health care centre, understand these are to be re-appraised and the Trust will be involved in this process which is a welcome development.</p>	<p>The Council will consult further with the North Middlesex Hospital Trust to ensure the scheduled population increase at Meridian Water are included in the secondary health and mental health care plans.</p> <p>The requirement for a new primary health centre at Meridian Water is set out in Policy EL5.</p>
22	A	Hertfordshire County Council			HCC Property (Development Services) on behalf of HCC services have no comments to make on the Consultation on the Proposed Submission Edmonton Leaside AAP.	Comment noted.
23		Environment Agency	Water Framework Directive and Biodiversity		We have several suggestions to embed Objective 5 “Celebrating the Lee Valley Waterways and Open Spaces” and ensure that the plan incorporates the objectives and actions of the Thames River Basin Management Plan and other evidence base documents for biodiversity protection and enhancement.	See responses to individual sections below.

					<p>The following aspects should also be included in the plan:</p> <ul style="list-style-type: none"> - invasive non-native species and their proposed management. There are patches of invasive non-native species that will need to be addressed through development, i.e. Japanese Knotweed growth on Eley’s Estate and Willoughby Lane Gasworks. - protected species and their protection through development, primarily bat corridors. - use of green roofs and/or green walls on development sites to improve biodiversity value and visual attractiveness. 	
23	A	Environment Agency	Vision		<p>The vision picks up on some of the social and economic aspects, but is lacking in recognising the importance of biodiversity and how environmental enhancements can also deliver benefits in these areas.</p>	<p>The vision references the need for sustainable living, working and leisure. The Vision is high-level and the objectives and policy establish the more detailed approaches to biodiversity and environmental enhancements.</p>
23		Environment Agency	Flood Risk and Sequential test		<p>The area covered by the plan is complex in terms of flooding as there are several watercourses and interactions between fluvial and surface water flood risk. The modelling used in your Level 1 and 2 Strategic Flood Risk Assessments has now been superseded. EA are currently in the process of reviewing the modelling in this area to incorporate the new allowances for climate change, though we do not anticipate this will be completed in 2017.</p> <p>The high level sequential test undertaken by Enfield demonstrates that development is necessary within Ponders End and Meridian Water in order to meet Enfield’s strategic objectives. However, section 3.6 of the Level 2 SFRA notes that a further sequential test will still need to be applied within the priority regeneration area boundary in order to steer development to areas of lowest flood</p>	<p>Note that the EA modelling based on the new allowances is now due for 2019.</p> <p>The Sequential Test will be applied within the site, steering development towards areas of low flood risk, but where this is not possible, the LPA in consultation</p>

				<p>risk and this is further reiterated within the recommendations (section 3.69 and 4.67). The requirement for a sequential test to be undertaken must therefore be included within the policy.</p> <p>The AAP must be supported by an up to date evidence base for flood risk and include an assessment for climate change. The AAP includes a significant level of growth unsupported by an up to date evidence base. As such the Sustainability Appraisal concludes that the plan has uncertain effects in respect of flood risk.</p> <p>Table 4.1 of the Sustainability Appraisal includes an objective for the plan to meet the challenge of climate change and ensure that new development is prepared for the impacts of climate change. Additionally, your Sustainability Appraisal scoping report notes that climate change is expected to increase the likelihood of flooding events in the future, and it is important that developments within the AAP, in particular the Meridian Water proposals, are compliant with flood risk guidance.</p> <p>We strongly recommend that the Level 2 SFRA is updated and an overarching flood risk assessment and strategy is developed for Meridian Water in particular, as this will help in determining whether there are any sites which may be suitable for offsite flood storage. 10.9.8 notes that the Level 2 SFRA has informed the masterplanning and design work to date, however this evidence is now four years old and there have been significant changes most notably the flood risk modelling and climate change allowances. It essential that the Meridian Water area overall is supported by an up-date evidence base. We welcome the opportunity to meet with you to discuss this matter with you further as you will also need to have an up to date evidence base for your forthcoming local plan.</p>	<p>with the EA will need to be satisfied that the Exception Test can be passed.</p> <p>The Council is currently updating the Level 1 SFRA and will update the Level 2 SFRA for Meridian Water afterwards (this is unlikely to be before 2019 as this is not possible until the new EA model is released).</p>
23	B	Environment Agency	Objectives 5	<p>The last point of this objective should be strengthened to say "reduce" flood risk rather than just "manage" flood risk to be</p>	Update Objective 5:

					aligned with National Planning Policy.	<i>'Manage-Reduce flood risk.'</i>
23	C	Environment Agency	Para. 2.1.3		The growth planned within this action plan provides an opportunity to protect and enhance the natural capital of the Blue Ribbon Network, which should be recognised in this section.	Add the following text to the end of paragraph 2.1.3: <u>'The Blue Ribbon Network is a strategically important series of linked spaces which should contribute to the overall quality and sustainability of London by prioritizing uses of the waterspace and land alongside it safely for water related purposes.'</u>
23	D	Environment Agency	Para. 2.1.11		The Blue and Green areas section should be expanded to ensure that improvements for nature value and wildlife are included.	Update paragraph 2.1.11 2 nd bullet point as follows: <i>'will become much more accessible and attractive <u>while improving natural habitats and biodiversity.</u>'</i>
23	E	Environment Agency	Page 18 table		The environmental context of the area perhaps doesn't quite fit within the 'socio-economic' profile and not everything mentioned falls under the umbrella of 'flooding' - this table could be subdivided. The proposed development also presents the opportunity to remediate sites where there have been potentially contaminative uses.	Update title at section 2.2: <i>'Socio-Economic <u>and Environmental</u> Profile.'</i> Update table column: <i>'Flooding <u>Environment</u>'</i>
23	F	Environment Agency	Policy EL1 Part B		Ground conditions and previous contaminative uses in some areas may limit the depths for foundations and in turn the number of storeys which can be built, thereby limiting density.	Technical constraints will be examined during more detailed site assessments. The extensive area of

						Meridian Water will mean certain locations are more suitable for taller buildings, based upon a range of factors which may include contamination and potentially limitations on foundation depth.
23	G	Environment Agency	Contaminated Land Figure 6.1		<p>It is expected that there will be general levels of contamination present that may have impacted groundwater, or that could be mobilised during any redevelopment. In order to achieve this, where developments are proposed within SPZ1s or on sites where historic contamination is likely to present a significant risk to groundwater, the EA expects developers to submit a Preliminary Risk Assessment in support of any planning application. This requirement should be included within an area wide policy:</p> <p>We strongly recommend the inclusion of a policy within the plan to address land contamination.</p> <p>The area designated within the plan is underlain by the Principal chalk aquifer, which is an important regional source of drinking water supply and has six Source Protection Zones (SPZs) in place to protect it.</p> <p>The chalk forms part of the Upper Lee Chalk Water Framework Directive (WFD) groundwater body, currently classified as having poor chemical status. The area is characterised by both previous and current industrial land use and it is expected that there will be general levels of contamination present that may have impacted groundwater, or that could be mobilised during any redevelopment. Particular attention should be given to the Willoughby Lane Gas works, which we have had significant involvement with as a result of levels of contamination present.</p>	<p>Planning applications for contaminated land already require a preliminary risk assessment.</p> <p>Retaining existing cover for sites that are left undeveloped would not be a problem, however, putting in a new protective cover is likely to be very expensive for land owners.</p>

				<p>Any development will therefore need to be protective of groundwater, particularly where it occurs within an SPZ1, and must avoid causing further deterioration in groundwater quality (both within the Upper Lee Chalk and the superficial Secondary aquifers), and result in a level of betterment. A policy should therefore be included to achieve this. The policy should ensure that developments are appropriately located and where the risks to groundwater from the proposed development are unacceptable the application should be refused. This in line with paragraph 109 of the NPPF, the requirements of the Thames River Basin Management Plan and with our groundwater protection Position Statements (GP3).</p> <p>Due to the sensitivity of this plan area and the high number of potentially contaminated sites developments should consider the geological context in terms of foundation depths and building height design. The plan indicates that there are to be numerous tall buildings which are likely to require deeper foundations. The underlying geology and presence of contamination may restrict the depth of foundations which can be used and therefore impact on the design of the development.</p> <p>We also recommend the inclusion of a mechanism within a policy to consider meanwhile uses in respect of contamination to detail the minimum requirements expected where meanwhile uses are proposed on sites which are known to be contaminated. We also expect any sites which are to be left undeveloped for the time-being should, as a minimum, be protected to minimise further leaching and migration of contaminants for example by retaining, or placing an impermeable protective surface layer.</p>	
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23	H	Environment Agency	Policy EL3		This policy should be read in conjunction with policy EL12 and ensure that there is a minimum of 8m set back from development to the top of the river bank.	The Council will seek further discussion with the EA on inclusion of minimum set-back distances.
23	I	Environment Agency	Section 5.7.8		Should recognise the potential contribution of improved open spaces and green and blue networks for encouraging healthy lifestyles. E.g. the River Restoration project in Mayesbrook in Dagenham ecosystem services assessment showed that the additional benefits to health and wellbeing and economic are substantial and we recommend this as a point of reference in developing this section further.	Update text at paragraph 5.7.8: <i>'Existing health inequalities will also be addressed by increasing access to education and employment opportunities. <u>Improved open spaces and green and blue networks can also encourage healthy lifestyles.'</u></i>
23	J	Environment Agency	Section 5.8.8 Segment 2		Recommend early engagement with EA for the proposed bridges as there are fixed requirements which may affect the design of these crossings. This includes a requirement for an Environmental Permit and details on (but not necessarily limited to) soffit heights, abutment location/design and bridge span.	Agree that EA must be involved early in bridging proposals to ensure that fixed EA design requirements are met.
23	K	Environment Agency	Section 5.9.5 and 5.9.6		Amend wording of section 5.9.5 - the climate change allowances have now been changed and are available on our website https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances . Clarify the text to explain what is meant by flood mitigation requirements creating competition below ground. Does this relate	Update wording at paragraph 5.9.5: <i>'The Environment Agency <u>has is updated</u>ing its requirements for climate change allowances to a higher level than those used to prepare the Level 2 SFRA and the Environment Agency's own fluvial modelling.'</i> Update text at paragraph 5.9.6:

					to the restriction of certain uses depending on their vulnerability or because it is planned to store flood water underground?	<i>'Flood mitigation requirements will create considerable competition for space across Meridian Water, both above and below ground, and must therefore be fully integrated at an early stage within the detailed design of streets, buildings and spaces.'</i>
23	L	Environment Agency	Policy EL8		<p>The requirement for the sequential test to be applied to individual development sites has still not been included within the policy, although we note the reference to the test in paragraph 13.4.1. Although this policy covers the minimum requirements (with the exception of the sequential test) it lacks the detail of the previous policy wording and the local specificity. As AAPs are intended to set out what developers are expected to do within a defined area it is surprising that this level of detail has been removed, unless this will be included in the New Local Plan for all developments.</p> <p>The last paragraph of the policy should be expanded on and clarified. The policy needs to be specific about the types of infrastructure which contributions will be sought for through planning obligations. It may not be appropriate to secure all flood risk mitigation through this route and any mitigation will have to be delivered on site as part of the development. For example, when floodplain compensation is required prior to a development being built. This policy should also consider how flood risk will be assessed and managed for meanwhile uses.</p>	<p>The Level 2 SFRA recommendation in 4.67 states "that the Sequential Test is to be applied within the site, steering development towards areas of low flood risk but where this is not possible, in making their allocations, the Council will need to be satisfied that the Exception Test can be passed" – as such the Council considers that Policy EL8 is sound.</p> <p>The Council would like to clarify with the EA what flood risk management infrastructure improvements in Lee Valley may be required and how they will seek funding contributions.</p>
23	M	Environment Agency	Para. 5.9.8		It should be recognised that restoration of watercourses is required for both flood mitigation and biodiversity enhancement. The illustrative image on this page shows very hard landscaping for the Lee Navigation. The vision should	Policies EL12 and EL27 address watercourses and requires that proposals protect and enhance habitats and biodiversity, including

					include greening of the river edge in line with the WFD actions and Enfield Biodiversity Action Plan.	naturalisation/ softening of river channel edges. The image on page 68 is illustrative only.
23	N	Environment Agency	Section 5.10		The map on this page should include rivers to show that rivers are part of the green infrastructure.	Figure 5.3 map does show watercourse, albeit not marked on the key. It should also be noted that this image is illustrative only.
23	O	Environment Agency	Policy EL9		The policy could make clear that the aim for new wetland habitat is also to enhance biodiversity and habitat availability - see comments on biodiversity in policies EL12 and EL27.	Update wording on Policy EL9 8 th bullet point: <i>'Where appropriate, that new wetland habitat is incorporated <u>which enhances biodiversity, and includes</u> ing boardwalks and pontoons to provide access.'</i>
23	P	Environment Agency	Policy EL11		This policy should acknowledge that tall buildings will need to consider underlying geological and contaminative context and ensure that watercourses are not overshadowed.	Technical constraints will be examined during more detailed site assessments. The extensive area of Meridian Water will mean certain locations are more suitable for taller buildings, based upon a range of factors which may include contamination and potentially limitations on foundation depth. The need to consider the impact of tall buildings on water spaces is required by the Draft London Plan Policy D8.

23	Q	Environment Agency	Policy EL12	<p>The wording in relation to naturalisation should be strengthened and inclusion of the term "where appropriate" undermines the requirements set out in policy EL27 and the opportunities highlighted in Enfield Biodiversity Action Plan and Thames River Basin Management Plan Actions which we have previously provided.</p> <p>The wording "widening and restoration of the Pymmes Brook, Salmons Brook and Flood Relief Channels" which was previously included with policy EL8 has been removed. Concerned that the policy is not strong enough to require developers to deliver the ambition for soft landscaping as shown in the illustrative image on page 67. The opportunity to deliver environmental improvements is often subject to other pressures, as highlighted in your sustainability appraisal. Policies should be sufficiently robust to make sure environmental improvements are afforded appropriate weight and recognition. Evidence base documents such as the Enfield Biodiversity Action Plan and Thames River Basin Management Plan can bolster plan policies.</p> <p>The policies should recognise the value that ecological enhancements can offer beyond just the environmental ones. E.g. the Mayes Brook river restoration scheme which used an ecosystem services approach to assess the social and economic benefits derived from services provided by an enhanced ecosystem.</p> <p>Also see Policy 2 and supporting text on page 30 of the River Corridor Improvement Plan for an example of stronger policy wording.</p>	<p>Policy EL12 relates to the Meridian Water area where development will be the most intense. Policy EL27 refers to the entirety of the AAP, including areas of less intensive development.</p> <p>The Policy EL12 reference to watercourses avoids specific labelling, ensuring that all watercourses within Meridian Water are subject to the policy requirements.</p> <p>The value of ecological enhancements is recognised in paragraph 5.11.10 - text updates to clarify this are set out in the table below.</p>
23	R	Environment Agency	Section 5.11.10 -	Please include additional wording to reflect that high quality public realm can also enhance biodiversity, wildlife provision and habitat	Update text at paragraph 5.11.10 as follow:

			5.11.11		connectivity. Enhancements to biodiversity and wildlife provision also create high quality public realm.	<i>'The plentiful and appropriate planting of trees and other greenery is essential to developing an aesthetically pleasing and high quality urban environment <u>which should provide habitat connectivity and enhance biodiversity.</u></i>
3	S	Environment Agency	Policy EL13		Pleased to see the inclusion of flood defences within the list of infrastructure provision. Blue and Green infrastructure should be included within the list in part a to secure funding for watercourse improvements that deliver environmental enhancements.	Policy EL13 already references infrastructure provision for waterside public realm improvements and new and improved open space. The Council will also seek further discussion with the EA on the potential to include blue and green infrastructure.
23	T	Environment Agency	Para. 6.5.9		Eley Road is also affected by flood risk and invasive species, which should be added to the description.	The issues in paragraph 6.5.9 reflect work carried out on industrial users of Eley's Estate for the Industrial Estates Strategy; referencing flood risk or invasive species are not relevant to this section.
23	U	Environment Agency	Page 100 Edmonton EcoPark		Other sources: National Policy Statement for Energy (EN-1) – This overarching National Policy Statement sets out the Government's policy for delivery of major energy infrastructure.	At Section 8.2 insert in the table under 'Other Sources': <u>'National Policy Statement for Energy (EN-1)'</u>

23	V	Environment Agency	Policy EL17		<p>Should include environmental improvements, ongoing maintenance of habitat along the waterways and management of invasive species.</p> <p>The DCO committed to the clearance, re-landscaping, planting and ongoing maintenance of an 8 metre buffer zone alongside the Enfield Ditch (main river). The landscaping works have yet to be designed/agreed but are likely to include a riverside path and native planting.</p> <p>A commitment for remediation of contaminated land and protection of groundwater should also be included as the site is in a Source Protection Zone (SPZ1).</p>	<p>See the NLWA response above regarding Chapter 8 and Policy EL17, including reference to the DCO.</p>
23	W	Environment Agency	Policy EL20		<p>Development proposals should be encouraged to be accompanied by details of proposed ecological enhancement works in addition to a management and maintenance plan. This should promote increased ecological connectivity along the watercourse and enhancement of habitats. Supporting text should identify opportunities for biodiversity enhancement.</p>	<p>Policy EL20 already requires development proposals to demonstrate landscaping strategies, including tree, shrub and wild flower planting, to enhance ecological links to the wider Edmonton Leaside area, and to be accompanied by an integrated long-term landscape and ecological management and maintenance plan.</p>
23	X	Environment Agency	Policy EL22		<p>The principles should be balanced with the need to protect and enhance biodiversity and ensure no increased flood risk. There are opportunities to include enhanced buffer zones between paths and rivers, improving habitat and connectivity.</p>	<p>The focus of EL22 is on new and improved cycle routes – flood risk and biodiversity are addressed in other policies.</p>
23	Y	Environment	Policy EL24		<p>Supportive of the use of waterways for transportation but</p>	<p>Policy EL22 states that any</p>

		Agency			<p>recommend early engagement with EA, particularly with regard to the floating classroom proposal. A floating classroom would not meet the national policy requirements, as educational institutions are considered a more vulnerable use which are considered inappropriate if located in flood zone 3.</p> <p>The general principles of this policy should be balanced with the need to protect and enhance biodiversity and ensure no increased flood risk. E.g. controlling the numbers of boat users, keeping river margins free of mooring to provide refuge areas for wildlife. River margins and channel should not be overshadowed as this prevents plant growth and reduces habitat.</p>	<p>proposals will be considered through consultation with the relevant statutory organisations. The 'floating classroom' is referenced by way of an example, and any proposal would be subject to consultation.</p> <p>This policy should be read in conjunction with EL27 and EL28 with reference to habitat, nature conservation and biodiversity.</p>
23	Z	Environment Agency	Policy EL27		<p>Placed there is an overarching policy within the document which focuses on watercourses within the plan area. Section 13.1.15 notes that increased usage of the watercourses can increase pressure on and negatively affect biodiversity and it needs to be clear in the policy that development must not result in a negative impact on the environment. It is positive that development proposals and SPDs must protect and enhance habitats through measures including softening river channels. This policy should be made stronger to ensure that all riverside development must explore the possibility of naturalising the watercourse fully and include an 8 metre set back free from built development to provide a natural buffer and prevent overshadowing of the channel - see comment above. Also beneficial to include wording within the policy to ensure that residential moorings must be designed in a way to ensure that the environment is not negatively affected.</p>	<p>Policy EL27 provides for improved opportunities for access, usage and regeneration, while balancing the need to protect and enhance habitats and biodiversity. The Council will seek further discussion with the EA on the wording of Policy EL27</p>
23	AA	Environment Agency	Policy EL28		<p>Section 106 agreements should only be used as a last resort if it has been shown that no biodiversity enhancements can be provided on site. This policy should also make reference to the multiple use of green spaces for example sports pitches could also be used as flood</p>	<p>Update text for EL28 as follows:</p> <p><i>'There is also potential to improve the access and functions at existing</i></p>

					storage capacity.	<i>green and open spaces including at Picketts Lock and Kenninghall Open Space, <u>Green and open space should be explored for multiple uses, including as providing potential flood storage capacity.</u></i>
23	AB	Environment Agency	Table 14.1		There is no reference in this table to any projects which will deliver watercourse enhancements for biodiversity improvement, yet this is set out in objectives 4 and 5 for the AAP.	The Council will seek further discussion with the EA on watercourse enhancement projects regarding Table 14.1.
23	AC	Environment Agency	Page 152		Please note that the EA have areas of landownership and rights within the plan area and would expect to be consulted on any CPOs affecting these rights.	Extensive discussions would be undertaken with landowners in advance of any proposed CPO.
23	AD	Environment Agency	Page 156		Confirm what is meant by provision of floodplain compensation in place ahead of development.	The Council would like to discuss with the EA how the wording could be clarified.
23	AE	Environment Agency	Para. 14.6.7		We are pleased to see a commitment to work with the EA and suggest a meeting to discuss the comments set out in this consultation response.	The Council will seek further discussion as per the responses noted above.
23	AF	Environment Agency	Waste		We strongly recommend a plan wide policy to safeguard the waste capacity provided by sites in the plan area including mechanisms for relocation and improving environmental quality. There are 37 waste sites in the plan area which collectively manage a large tonnage of waste – approximately 1.4 million tonnes, received not just within Enfield and London, but across the country. The Edmonton EcoPark provides around half of this capacity but the	The reference to 37 is borough-wide; the number of sites within the ELAAP boundary is significantly fewer. The Council is fully aware of the importance of the waste sites located in the area. However, the

				<p>rest is provided by the permitted sites. The plan contains a policy for the Edmonton EcoPark site but does not currently consider the provision of capacity from the other permitted sites in the area and how these might be safeguarded or facilities developed.</p> <p>Many industrial areas within the plan area are also included within the North London Waste Plan as areas to safeguard or provide capacity in the future. Under the Duty to Co-operate you should work with the NLWP to ensure that you have complimentary policies in relation to safeguarding waste capacity.</p> <p>The Sustainability Appraisal does not currently expect significant effects of the plan from a waste perspective. The inclusion of a policy to ensure that waste sites are appropriately safeguarded, designed and clustered where possible, may result in an overall positive effect on the environment. Particularly if sites can be clustered and infrastructure upgraded. Encouraging enclosure of expansion of existing and new waste facilities would also contribute to improving air quality and provide further positive effects. The NLWP has committed to including a requirement for enclosure of waste facilities in their policies. Suggest the following text:</p> <p><u>Where waste facilities are sited in an Air Quality Management Area and close to sensitive receptors we will normally require that the operations will be carried out within a covered building enclosed on all vertical sides with access and egress points covered by fast acting doors which default closed in order to minimise local public health and environmental impact. This is regarded by the Environment Agency, Boroughs and GLA as best practice for waste sites.</u></p>	<p>proper mechanism for safeguarding waste sites as required by the London Plan will not be through this AAP but rather through our ongoing local plan review as well as through the ongoing production of the North London Waste Plan (NLWP), as we will have to consider this in the round. This will have to take into account all projected waste capacity and need in the borough and in the wider NLWP area as well as local and wider area regeneration aspirations and other relevant considerations. We do not wish to prejudice either our local plan nor the NLWP production process.</p> <p>The duty to cooperate is not in this case relevant as we are part of the ongoing NLWP production and are actively participating in this group to bring relevant policies forward for adoption.</p> <p>Regarding clustering of waste sites, this is something that is already happening and further being promoted through the NLWP, however this must and will be weighed up against the potential</p>
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						<p>negative cumulative effects from too extensive a concentration of waste uses and a lack of spatial distribution to service the wider area.</p> <p>Enclosure of new sites and associated benefits will be ensured through the requirements made as part of EA licensing of waste sites. This, as well as improvements to the design and environmental quality of existing and new sites will be promoted and welcomed by the NLWP. We have passed your suggested wording to the NLWP for consideration.</p>
23	AG	Environment Agency	Sustainability Appraisal		The EA provided numerous comments on the ELAAP Sustainability Appraisal	Comments noted.
23	AH	Environment Agency	Meridian Water Spatial Framework		The EA provided numerous comments on the Meridian Water Spatial Framework document.	This document provides only an indicative view of how Meridian Water could be developed. The ELAAP document itself provides the policy and guidance against which planning proposals will be assessed.
24	A	Vibrant Partnerships			Vibrant Partnerships is the trading name of Lee Valley Leisure Trust. We are a charitable organisation which manages and operates leisure venues within the area covered by the ELAAP.	Comment noted.

					Vibrant Partnerships works in partnership with the Lee Valley Regional Park Authority (LVRPA) to provide high class management of the sporting, leisure and recreation facilities on Picketts Lock and our vision with the LVRPA, is to create regionally important visitor destinations but also for local people to enjoy.	
24	B	Vibrant Partnerships			The Vision set out by the London Borough of Enfield for the area is ambitious but realistic.	Comment noted.
24	C	Vibrant Partnerships			We understand that the designation of Picketts Lock site is as ‘a major developed site in the green belt’ and that this will remain until the Council completes its review of green belt boundaries in time for the new draft Local Plan. We suggest that this designation should be reviewed by the Council as part of this area action plan consultation so that the widest possible leisure provision can be considered for Picketts Lock. With the built developments previously on the site and the current built developments, it is questionable whether this site contributes to the tests required by the NPPF (2012) as required for greenbelt land.	The designation of ‘major developed site in the green belt’ was established by the adopted Core Strategy and remains extant. It is not clear to the Council that the locations referred should be removed from the green belt criteria. Any proposed changes to the green belt boundary will be subject to green belt review and, if appropriate, will be made through the new Local Plan.
24	D	Vibrant Partnerships			Welcomes the opportunity for the ‘re-use or redevelopment of existing open space at Picketts Lock’ but with the current constraints of green belt designation this may limit the scope and ambition for the site. We would support the retention and provision of some publicly available open space on the site and the enhancement of cycling and pedestrian routes through and around the site. Equally, there may be scope for very modest residential development on part of the site linked to other existing residential areas in the vicinity that could help improve the access, infrastructure, safety and general community visits and community	The ELAAP does not seek any changes to the green belt boundary. Any alternations to the green belt boundary will be made through the new Local Plan.

					safety on and around the site to help 'lift' the area generally.	
24	E	Vibrant Partnerships			The draft Plan's assessment of Picketts Lock as being relatively inaccessible is agreed, but the Plan does not appear to seek a significant solution to address this apart from the development of a pedestrian/cycle bridge to connect with communities to the west. Given the plan's focus on delivery it has to be realistic in understanding the constraints on developing Picketts Lock and the proposals for this bridge crossing need careful scrutiny given the 'burden' they may place on the costs of development at this site. Recommend that publicly funded infrastructure projects are considered to help the step change in regeneration at Edmonton Leaside. Specifically, the relocation south of the existing Ponders End station would better serve the Picketts Lock site. We would ask that this is considered as part of an overall package of measures linked to the CrossRail 2 scheme.	Figure 11.1 sets out proposed location of a potential new connection from the Ponders End area towards Picketts Lock. It is recognised that this would be a partial solution, with future work needed to further increase accessibility. Funding for a bridge is not a requirement in the AAP. The Council will seek further discussions with the LVRPA to address concerns on this area. The location of stations will be considered a part of the process of progressing Crossrail 2; it would be premature to establish a position for this section of the railway line.
24	F	Vibrant Partnerships			Welcome the Plan's proposals of increasing the use of waterways for leisure and including the potential for residential use. Would welcome discussions as part of the consultation on this Plan with Vibrant Partnerships, Enfield Council, LVRPA and Canal and River Trust to explore this further in relation to the Picketts Lock site and potential mitigation requirements/ considerations of surface water/flooding management associated with Meridian Water.	The Council will seek discussion with Vibrant Partnerships on the Picketts Lock site and potential mitigation considerations of surface water. Flood management associated with Meridian Water.
24	G	Vibrant Partnerships			Anticipate the Draft Plan proposals having a significant impact on the wider Regional Park given their scale and proximity. Many of the proposals are to be welcomed in the regeneration of	The broad-based approach to regeneration of the ELAAP area will enable greater use of the LVRP and

					such a large area of underused former employment land to create a high quality and sustainable neighbourhood. It is to be hoped that the anticipated levels of investment will further stimulate developer interest in sites such as Picketts Lock and other parts of the Regional Park. A step change in the regeneration of this area could be delivered.	help to underpin investment proposals in sites such as Picketts Lock.
25	A	Education and Skills Funding Agency			Significant growth in housing stock is expected in the borough; the AAP confirms that up 5000 new homes will be needed within this area by the end of the plan period in 2032. This will place additional pressure on social infrastructure such as education facilities.	The ELAAP addresses the need for additional school place provision through Policy EL5 on Community Facilities in Meridian Water.
25	B	Education and Skills Funding Agency	EL5 and supporting text		<p>It would be helpful if key national policies relating to the provision of new school places were explicitly referenced within the document. In particular:</p> <ul style="list-style-type: none"> - The NPPF (para 72) advises that local planning authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education. - The ESFA supports the principle of London Borough of Enfield safeguarding land for the provision of new schools to meet government planning policy objectives as set out in the NPPF (para 72). When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary. - London Borough of Enfield should also have regard to the Joint Policy Statement from the Secretary of State for Communities and 	<p>While NPPF requirements for education provision will be fully considered as necessary for development proposals, the AAP seeks to avoid duplicating policy wording.</p> <p>Any requirement for a new school to safeguard land for potential expansion should be considered at the point of detailed proposals, whether through an application or masterplan.</p>

					Local Government and the Secretary of State for Education on 'Planning for Schools Development' (2011) which sets out the Government's commitment to support the development of state-funded schools and their delivery through the planning system.	Comment noted.
25	C	Education and Skills Funding Agency			<p>The ESFA encourages close working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places. In line with the Duty to Cooperate, please add the ESFA to your list of relevant organisations with which you engage in preparation of the plan</p> <p>The ESFA commends, for example, the approach taken by the London Borough of Ealing in producing a Planning for Schools Development Plan Document (DPD). The DPD includes site allocations as well as policies to safeguard the sites and assist implementation.</p>	<p>The ESFA is included on the Council's consultation list for Local Plan documents.</p> <p>The Council will consider its approach to site allocations for schools as part of the emerging Local Plan process.</p>
25	D	Education and Skills Funding Agency	Policy EL5 Para 5.7.3 and 5.7.4		<p>EL5 relates to community facilities and schools. The supporting text suggests (based on GLA standard child yield and a minimum mix of 10,000 3+ bed homes) that three 2FE primary schools and one 8FE secondary school would be required. This differs from the forecast demand set out in section 2.2 so may require clarification to ensure adequate provision is made for school places at an early stage of the plan. Crucially, both the supporting text and Policy EL5 identify the importance of monitoring emerging child yield as development continues so that school place demand can be updated to ensure the educational need is met depending on the mix and tenure of housing, which emerges.</p> <p>The policy and supporting text acknowledge the need for high-density development across the Meridian Water site and the</p>	<p>Update text at Section 2.2 table, under 'Education', as the requirements are discussed later in the AAP document:</p> <p><i>'There is forecast demand for primary and secondary school places – the provision of two new 2 FE (Forms of Entry) primary schools and one 8 FE secondary school (with 6th form) will be necessary.'</i></p> <p>The approach set out in paragraph</p>

					<p>resulting need for innovative design and approach to school provision. Reference is made to the size of schools being within Department of Education guidelines or as agreed with the Planning Authority. It is unclear as to what guidelines the planning authority may use and appropriate education advice should be sought in this respect as necessary. In both regards, the need for high-density development and any resultant site size restrictions should not unduly constrain or conflict with operational/educational requirements of the school/s.</p>	<p>5.7.4 is to ensure that education facilities in high-density developments meet the required standards, looking towards DoE guidance and the London Plan.</p>
25	E	Education and Skills Funding Agency			<p>Arising from the potential land constraints of the wider site, off-site playing fields may be necessary (as set out within the policy). The specification that playing fields should be provided within 400m of a school and should be safely accessible is noted and welcomed. However, this should not act to prohibit school delivery where this distance cannot be met. Linked to this, the wider emphasis throughout the document (including within Policy EL7) on improving accessibility, public transport and footpath/cycle links is also supported. This is reflected in the policy that requires schools to be accessible to pupils and to consider the traffic flows/impacts of surrounding uses. This is also reinforced by the area wide policies such as Policy EL21, which seeks to improve the pedestrian and cycle routes in order to encourage greater walking/cycling and reduce car use. Other policies also relate to improved bus routes (EL23) and use of waterways for transportation (EL24).</p>	<p>Provision and access to outdoor sports pitches is important to ensuring secondary schools have appropriate facilities. Policy EL5 establishes a maximum distance so that the facilities are within walking distance for the students.</p> <p>Enabling safe connectivity around Meridian Water and the wider area through the use of active modes and public transport is vital for sustainable school access.</p>
25	F	Education and Skills Funding Agency	Polices EL5 and EL13		<p>Need to ensure that education contributions made by developers are sufficient to cover the increase in demand for school places that are likely to be generated by major developments. The ESFA note that in terms of delivery of the required schools, Policy EL5 cites both CIL and S106 contributions as potential sources of funding. Policy EL13 (Infrastructure Delivery in Meridian Water) provides further clarity, with this approach being supported by the ESFA.</p>	<p>The ESFA is included on the Council's consultation list and will</p>

					15. The ESFA would be particularly interested in responding to any review of infrastructure requirements, which will inform any CIL review and/or amendments to the Regulation 123 list. As such, please add the ESFA to the database for future CIL consultations	be contacted for any review of the CIL or S106 documents or approaches.
25	G	Education and Skills Funding Agency			Please advise the ESFA of any proposed changes to the emerging AAP policies, supporting text, site allocations and/or evidence base arising from these comments.	The Council will contact the ESFA to discuss the comments and responses.
26	A	Enfield Health (Barnet, Enfield and Haringey Mental Health Trust)	One page letter	Soundness	Support the response to the ELAAP made by Enfield Healthwatch in their letter of 28 th April 2017. Particularly concerned regarding access to local and GP primary care for residents and would like to hear how the Council will progress this with Enfield CCG.	Comment noted. Refer to the Council's response to the Enfield Healthwatch submission.
	B	Enfield Health	One page letter	Soundness	Wish to register their concern regarding progress on the development without sufficient attention being paid to the impact on stretched mental health and community health resources. Request to hear how the Council is factoring this into commissioning plans for Children's Health Services and Children and Adolescent Mental Health Services (CAMHS) over the coming years and what discussions it has had with the CCG concerning additional support for mental health including access to IAPT.	Council services are aware of rising demand from the borough's increasing population and the need to plan for this.
27	A	GLA			While the intention to increase housing is supported, this needs to be considered against the proposed loss of SIL. Enfield's industrial land release benchmark in the GLA's Land for Industry and Transport SPG is 33ha (2011-31). The GLA's Industrial Land Supply and Economy Study (2015) indicates that 22ha of industrial land (designated and non-designated) was released 2010-2015. The	Transformational regeneration at Meridian Water is a longstanding aim which is agreed by both Enfield Council and the GLA, and is included in both Enfield's Core Strategy (2010) and the London

				<p>Study also indicates that a further 24ha (excluding the 18ha at Harbet Rd) is identified for potential release through the ULVOAPF (2013), which is considerably above the London Plan/ SPG benchmark. Transport improvements on the West Anglian Main Line, potentially including Crossrail 2, are expected to lead to further pressure for industrial land release in Enfield.</p> <p>Evidence in the GLA's Land Demand Study (2017) suggests positive demand for industry and warehousing in Enfield for 2016-41. Harbet Road estates benefits from direct access to the A406 which gives the location a strong qualitative advantage for logistics and industry and it plays an important function as part of the wider SIL in this area. The northern part of Harbet Road estate was granted outline planning permission on appeal in 2015 for 46,451sqm of industrial floorspace, indicating the site is both viable and attractive for this type of use. The southern part of the site contains a bus depot, which needs to be relocated within the Meridian Water Masterplan area to support the growth envisaged within the AAP.</p> <p>The land proposed as replacement SIL at Deephams STW (34) cannot be considered as new SIL capacity as the site is in use for utilities infrastructure, and is therefore not compensation for the loss of SIL at Harbet Road which supports 'core' industrial and warehousing/ logistics functions. The three smaller sites (4ha) could contribute to industrial capacity, however these would not be an effective replacement for the loss of SIL at Harbet Road due to their smaller size, lesser accessibility and fragmented nature.</p> <p>The GLA cannot support such a large-scale loss of SIL until there is a full consideration of the potential SIL/ industrial land reconfiguration across the whole of the Upper Lee Valley. This is being undertaken as part of the ULVOAPF; while Crossrail 2 is beyond the time period of the AAP, the OAPF will consider how</p>	<p>Plan.</p> <p>Meridian Water has been awarded Housing Zone status funding by the GLA, recognising the importance of this location to providing homes not only for the borough, but on a London-wide basis.</p> <p>There is also a great need in this part of the borough to provide more jobs, and higher-paying employment opportunities, to address the high levels of deprivation relative to other parts of Enfield and London.</p> <p>Extensive modelling work indicates how a high quantum of new homes and jobs can be achieved at Meridian Water if the whole of the site can be used with greater flexibility.</p> <p>Designated SIL does not allow the flexibility of uses that Meridian Water requires to achieve effective delivery and its regeneration aims. The SIL at Harbet Road has led to a low density, and often low value, of employment. The Draft London Plan does offer some flexibility for intensification and SIL release,</p>
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				<p>Crossrail 2 will facilitate the growth anticipated.</p> <p>The quantum of SIL and LSIS release and reconfiguration as detailed in Policy EL14 and table 6.2 is not currently in general conformity with the London Plan. However, GLA officers would welcome further discussions with the Council on this matter. Advice to date has indicated that the southern part of Harbet Rd SIL may be suitable for de-designation subject to the intensification on industrial and warehousing uses on the northern part; however intensification would need to be delivered prior to de-designation.</p>	<p>which the Council is exploring further.</p> <p>The proposed SIL over and around Deephams STW is aimed more at providing a coherent area of SIL and protecting the three small sites, rather than replacement SIL per se.</p> <p>The Council will seek further discussion with the GLA on the approach to industrial land designations within ELAAP.</p>
27	B	GLA		<p>Other than the approach to industrial land release, the stated vision and objectives for the Edmonton Leaside area, and in particular the Meridian Water Regeneration Area, are supported, in line with the ULVOAPF and London Plan.</p> <p>An updated OAPF is currently being updated to better reflect expected population growth, transport movements, Housing Zone status and increased housing targets for a number of areas, including Meridian Water. It is essential that strategic and local plans are as closely aligned as possible in order to realise this ambition.</p>	<p>The Council will be closely involved in preparation of the OAPF and agrees that the plans must be as closely aligned as possible.</p>
27	C	GLA		<p>The requirement in Policy EL1 to achieve a minimum of 35% affordable housing and to work towards 50% is supported. However, the wording around the 35% reference is unclear and should be clarified.</p>	<p>The Council will seek further discussion with the GLA on wording in Policy EL1 relating to 35% affordable housing.</p>
27	D	GLA		<p>For clarity an additional map showing current SIL and LSIS designations should be included.</p>	<p>The Council will seek to discuss with the GLA the most suitable way</p>

						of showing SIL and LSIS designations in the AAP.
27	E	GLA			The proposals for the redevelopment and reconfiguration of the retail units at Ravenside Retail Park as discussed in Policy EL4 are supported. However, in line with the NPPF and London Plan Policy 4.7, this should not lead to an intensification of retail floorspace without application of sequential and impact assessments. It is therefore recommended that Policy EL4 makes this clear.	The Council will seek further discussion with the GLA regarding reference to sequential and impact assessments.
27	F	GLA			Policy EL16 for employment and mixed uses is supported, as is the clause that residential uses will not be appropriate on this site.	Comment noted.
27	G	GLA			The proposal to relocate the Harbet Road bus depot, as discussed in paragraph 5.4.19 should be discussed with Transport for London. TfL comments are attached as an appendix.	See TfL comments and responses.
27	H	GLA			Section 5 and Policy EL10 infers that active frontage only relates to non-residential uses; however paragraph 2.3.3 (and Housing Standard 10) of the Mayor's Housing Standard SPG states that 'active frontages are defined as development frontage on the ground floor where inhabited residential or non-residential uses are located, with a visually permeable elevation (e.g. windows or glazing) and a generous distribution of entrances'. It is recommended that Policy EL10 makes this clear.	The Council will seek further discussion with the GLA on referencing active frontages in the ELAAP.
27	I	GLA			Policy EL11 states that 'no more than 10% of all north facing residential units are single-aspect'; however Housing Standard SPG states that 'single aspect dwellings that are north facing, or exposed to noise levels above which significant adverse effects on health and quality of life occur, or which contain three or more bedrooms, should be avoided'. It is recommended that Policy EL11 reflects this.	The Council will seek further discussion with the GLA on residential unit aspect requirements.

27	J	GLA			Suggested that all maps in the document include a key, as some currently have none – figures 2.3, 2.4, 8.1, etc. Component parts of the current Meridian Water Masterplan are shown – figures 5.1, 5.2, etc, however it is recommended that the current masterplan is shown in Section 5.2.	Update AAP to include keys for: Figure 2.3, Figure 2.4, Figure 8.1. Figure 10.1. The AAP is not seeking to provide a full masterplan, with the diagrams being largely indicative.
27	K	TfL			There is an opportunity to update the AAP to reflect the Healthy Streets approach, in particular taking account of the 10 Healthy Streets indicators.	The Council will seek further discussion with TfL regarding inclusion of the Health Streets Approach.
27	L	TfL			The A406 is part of the Transport for London Road Network (TLRN) – the AAP proposed removal of the access ramp with Aragon to the A406. TfL technical approval would be needed. TfL and the Council will need to work together on any proposals within, over, under or adjacent to the A406 to improve connectivity and the quality of the environment taking into account the existing nature of this road and the functions it will continue to perform.	Noted
27	M	TfL			Significant investment will be needed in the bus network prior to 5,000 homes, and to deliver 10,000 homes will require Crossrail 2. Therefore we would include the following projects in Table 14.1: <ul style="list-style-type: none"> - Early bus network for Meridian Water - developer contributions, TfL – this should be developed alongside the Meridian Water Highway Infrastructure Study and borough-wide service review as well as through individual sites. - Upper Lea Valley transport modelling and bus priority study – TfL, Enfield, Haringey – this study should be completed summer 2017. - Meridian Water to Edmonton Green direct bus link – outcome should define bus infrastructure design and how it fits into the 	The Council agrees that significant investment in the bus network will be needed to deliver the homes at Meridian Water. The ELAAP supports this most strongly through policies EL7, EL22 and EL23. The Council will seek further discussion with TfL regarding these proposed project additions to the Table 14.1.

					wider bus network.	
27	N	TfL			<p>Crossrail 2 is beyond the time period of the AAP, however to achieve the growth anticipated in the Upper Lea Valley, it is right that the AAP considers how Crossrail 2 will facilitate growth in the AAP area. TfL is promoting Crossrail 2, however it is likely to require significant private sector funding to delivery it by 2033.</p> <p>The previous AAP figure of 5,000 new homes aligns with the minimum Crossrail 2 do-minimum scenario. With Crossrail 2 10,000 new homes could be built at Meridian Water. The AAP should acknowledge that:</p> <p><u>The introduction of Crossrail 2 could lead to further opportunity for development including sites north of the North Circular beyond the number of homes currently identified in the AAP.</u></p> <p>The AAP needs to be much clearer in explaining the role that Crossrail 2 has to facilitate in facilitating uplift in development since the 2014 AAP.</p> <p>In addition, the AAP should not use the terms Crossrail 2 and 4-tracking interchangeably but should be clear that Crossrail 2 can facilitate more housing growth than just 4-tracking.</p>	<p>The need to see a transformation in public transport infrastructure is recognised in numerous places in the ELAAP including the Vision, Objective 2, paragraphs 1.1.4, 5.3.5 and 5.8.11, and Policy EL7.</p> <p>New housing within the ELAAP is located within Meridian Water and the Plan does not look to beyond this boundary for potential further residential impact from Crossrail 2.</p> <p>The ELAAP establishes levels of housing based on urban design principles; achieving the higher densities will require a step-change in PTAL, but are not dependent on CR2.</p> <p>In most cases the AAP text does not use these terms interchangeably. However, the Council will seek to discuss further with TfL whether and how the text could be clearer.</p>
27	O	TfL	Various sections		<p>The AAP development assumes uplift in PTAL of 4-6 and 'Urban' character, from a low base – an aim TfL supports. The additional transport provision required to support an increase in housing numbers is not clearly set out in the AAP. The transport</p>	<p>The Council would like to further discuss with TfL the references to the increase in train services in</p>

			Paragraph 10.1.3	<p>assumptions of 4 trains per hour in 2018 and 8 tph in 2022 are not committed.</p> <p>The STAR service is 2 tph between Stratford and Meridian Water, while other Greater Anglia services will stop at Meridian Water and Ponders End. At present the total frequency of trains calling at Meridian Water is 2-4 ph. Enfield Council is working with GLA, TfL, Network Rail, Greater Anglia and the DoT to increase the service frequency, potentially by introducing a shuttle service from Tottenham Hale.</p> <p>The text reads as though the plans to introduce the service uplifts are confirmed. TfL is not aware of current plans to increase frequency to 8 tph from 2022 and further capacity is unlikely to be available at Stratford to facilitate this proposal. 4 tph is not deliverable in 2018. Meridian Water Station due to open in 2019.</p>	<p>paragraph 1.1.4, Objective 3, paragraphs 5.8.16 and 11.5.2, and Table 14.1.</p> <p>Update paragraph 10.1.3: <i>'To take advantage of step-change improvements to transportation links in the area, including a significant increase in the number of four trains-per-hour-from-2018 and eight trains-per-hour-from 2022-on the railway line between Brimsdown and Stratford;</i></p>
27	P	TfL	Freight and SIL	<p>Freight is an essential user of the road network which requires SIL in outer London to serve all of London. The Mayor is keen to reduce freight traffic in central London and manage its impacts overall. Protecting warehousing and industrial land close to key growth areas is part of that vision. If SIL is released in one part of London TfL would want to understand the effects of where those business activities would now take place, and what effects this would have on services locally and to the rest of London.</p> <p>TfL recommends that release of SIL should be considered at the London-wide scale and linked to strategic changes to the transport network beyond the life of this plan.</p>	<p>The reasons behind releasing SIL at Meridian Water are set out above in the reply to the GLAs comments.</p> <p>The Council can discuss further TfL's concerns in terms of potential impact on the transport network,</p>
27	Q	TfL	Water freight Policy EL24	<p>TfL is keen to promote more water freight in London. To do so locally need to define water kinds of water freight the Council would seek to grow in Edmonton Leaside and the land use and</p>	<p>Policy EL24 provides support for freight transport by water to help</p>

				<p>infrastructure implications. In the absence of specific types of growth, the following actions aimed at growing water-based freight are recommended:</p> <ul style="list-style-type: none"> - Protect key wharfs and road access to them through the planning process. - Establish a working group with the LPA, potential freight operators, end users, and Canal & River Trust to growth the borough's long-term ambitions. <p>The amount of locks and poor water infrastructure within the borough constrain the development of this mode in Enfield.</p> <p>Further guidance on water freight forms part of the Mayor's Transport Strategy, published 2017.</p>	<p>alleviate the road network, and requires any proposal to undergo consultation with the statutory bodies. To maintain a flexible approach the policy avoids detailed prescription.</p> <p>Water infrastructure can be improved to support increased usage.</p>
27	R	TfL	Section 1.1	<p>There should be a mention of how critical bus services will be, particularly in providing east-west connectivity and in linking the site to Edmonton.</p>	<p>Insert a new paragraph following paragraph 1.1.5:</p> <p><u>'Improved bus services will provide greatly improved connectivity with Edmonton Leaside and to the wider area, in particular supporting east-west linkages and access to Edmonton Green.'</u></p>
27	S	TfL	Objective 1	<p>Need to include references to public transport routes.</p>	<p>Update Objective 1, 7th bullet point:</p> <p><u>'Provide well-connected, well-designed pedestrian and cycle routes that encourage people to choose active travel modes along with excellent access to</u></p>

						<u><i>public transport options.</i></u>
27	T	TfL	Para 5.4.19		<p>The AAP observes the need to safeguard the Bus Depot, in accordance with the Mayor’s Land for Industry and Transport SPG. TfL will advise the Mayor on whether an alternative site is suitable and will need to know it is secured for use as a bus depot before agreeing to the loss of the bus depot at Towpath Rd.</p> <p>In an area of residential and employment growth, to ensure the bus network is delivered at reasonable costs and the standards required by TfL, we need to retain and expand bus depot capacity to 200 units (buses) with associated workshops to be accommodated locally. This site would need to be operational before the existing facility could close. TfL expects planning permission for the alternative site to be secured prior to granting permission for an alternative use of the depot site.</p> <p>TfL recommends incorporating a new bus depot into the Meridian Water Masterplan.</p> <p>There are also wider benefits of retaining a bus depot on site to support locally skilled jobs and suppliers. Innovation in technology means skills will change over time so links to local training and educational institutes should be encouraged.</p> <p>TfL will not agree to the loss of the garage as part of the AAP suggest we might. We will work with the Council to make sure an appropriate bus depot is provided within the AAP area.</p>	<p>As set out in paragraph 5.4.19, the Council will engage with TfL and Arriva in finding a viable alternative site for the bus depot at Harbet Road.</p> <p>The presence of a bus depot within Meridian Water may not be in accordance with need to achieve a high density of uses and employment, and it may be more suitable to locate in the wider ELAAP area. Further detailed Meridian Water master planning work will identify more specific locations for land uses.</p>
27	U	TfL	Policy EL6		<p>Recommend the policy should specify that as per 5.8.3 that the Causeway should prioritise Public Transport.</p>	<p>The Council will seek further discussion with TfL on wording in Policy EL6 referring to the prioritisation of public transport.</p>

27	V	TfL	Policy EL7		Should refer to bus standing as well as interchange.	Update text at Policy EL7, 3 rd bullet: <i>'Improved bus interchange and bus standing connecting Meridian Water to...'</i>
27	W	TfL	Para 5.8.17		Should refer to bus standing. Good to see a strong approach to discouraging car parking.	Update paragraph 5.8.17: <i>'A new bus interchange and associated bus standing will be provided, creating a transport hub and connecting bus services to the station.'</i>
27	X	TfL	Section 11.3		Also add modal shift to public transport, which is much preferable to shared mobility (car clubs, electric private vehicles).	Update paragraph 11.3.2: <i>'Sustainable transport will be supported through high quality public realm and a modal shift towards public transport. Greater rates...'</i>
27	Y	TfL	Policy EL23		This policy should be used as an exemplar for other policies. Needs to be some interaction between walking and cycling policies/network. The bus hierarchy might well look like the cycling and walking routes identified in Figure 11.1.	Not clear from this comment whether amendments are sought – the Council would like to discuss further with TfL.
27	Z	TfL	Table 14.1		There are 3 entries for the bus network in terms of delivery. TfL has appointed Arup to prepare the Upper Lee Valley transport modelling and bus priority study – this will identify infrastructure needed to deliver growth in the ULV, including Edmonton Leaside.	The Council will seek to discuss the Table 14.1 bus network entries further with TfL.

27	AA	TfL	Maps		Ponders End Station is too far north.	Ponders End Station to be moved south to the correct location in all maps in the AAP -see <i>Schedule of Minor Amendments</i> item 63.
27	AB	TfL	Transport Review		The evidence appears to be discussing only parking levels rather than overall transport strategy. Query how the required bus movements are calculated as the figures appear fairly arbitrary and do not account for where the demands are too/ from.	The Transport Review is a high-level assessment of the evidence in relation to the transport implications of the AAP. Further detailed studies will be required to support development proposals and masterplans.