



EDMONTON LEESIDE AREA ACTION PLAN

EXAMINATION

FINAL

Hearing Position Statement

Matter 4: Design and Heritage

Issue: Whether the Plan would secure high quality and inclusive design, which would protect and enhance the built, natural and historic environment.

i. Is there sound evidence that the projected level of development at Meridian Water can be delivered? Are the assumptions made in the Scenario Testing robust in relation to:

- **available developable area,**
- **parking provision**
- **open space requirements**
- **grounds conditions and, underground infrastructure**
- **the spatial effects of flood risk/prevention measures**

To demonstrate the level of development which could be achieved at Meridian Water a robust evidence base was prepared. The methodology and output of this work is provided in the *Scenario Testing* report.

- The available developable area of Meridian Water is established in Section 4.2 of the *Scenario Testing* report. Underlying assumptions and specific lists are provided of land considered to be developable or undevelopable. A varying factor was to develop scenarios testing development potential at varying levels of loss of designated industrial land.
- Parking provision was assessed on the basis that Meridian Water will be supported by a greatly enhanced public transport network; the station and third railway line are currently under construction. There will also be a great emphasis on active travel modes. These factors, combined with the desire to make the most efficient use of land, mean that new housing will be designed at a low car ratio, significantly reducing the impact of Meridian Water on the local and strategic road network. It should be noted that the Phase 1

application was approved with early units at an initial parking ratio of 0.6, to reduce to 0.4 as the development and associated improvements progress.

- The Scenario Testing document section 5.6 examines the potential for provision of open space. For scenarios 3 and 4 the testing also includes the area of Lee Valley Regional Park to the east of the site, some of which is owned by Thames Water.
- The assumptions did not include restrictions due to underground infrastructure. The approach assumed such infrastructure would be taken into account through the design and development approach (e.g. regarding the Thames Water Tunnel on the east of the site).
- Evidence modelling is on the basis that flood risk will be managed through a mix of on-site and off-site measures. The spatial effects of flood risk/prevention measures were not specified, with the management of flood risk addressed through Policy EL8.

More specific testing will be undertaken as part of the upcoming Meridian Water Masterplan and specific planning applications, as more details will be available to undertake a thorough assessment.

ii. Would the policies in the plan provide homes fit to live in for existing and future generations? Does the Plan reflect local and national guidance in this regard?

Ensuring the provision of high quality homes is a key aspect of the ELAAP. Policy EL1 supports affordable housing at Meridian Water, with initial phases expected as a minimum to deliver the Mayor's 35%, while across the regeneration as a whole the Council's 40% target is currently expected.

The extensive evidence base work, as provided in the *Scenario Testing* report, demonstrates the optimum number of homes achievable at Meridian Water if sufficient amenity is to be maintained. Policy EL1 establishes that while 10,000 new homes are achievable at Meridian Water, this is dependent on achieving high quality urban design and sufficient supporting infrastructure.

The ELAAP design policies- EL10 Urban Grain, EL11 Building Form and EL12 Public Realm – together provide the framework to guide delivery of a new neighbourhood which meets the needs of its residents over the long term. These policies reflect NPPF (2018) requirements on achieving well-designed place, for example the list of paragraph 127 requires developments to be '*visually attractive as a result of good architecture, layout and appropriate and effective landscaping*'.

The draft London Plan (2017) places a strong emphasis on design, including optimising housing density (Policy D6), which are in line with the ELAAP approach.

Enfield's Core Policy 4 establishes the overall policy requirements for housing quality while DMD policies provide a more specific policy framework on standards for new residential development in the borough.

The Council's new design panel will additionally provide capability to assess and ensure design quality as future planning applications come forward in the ELAAP area.

iii. Are the policies in the plan (EL9, EL10? EL11 and EL12) appropriate and achievable in relation to

a. tall buildings

b. active frontages

c. the provision of open space

d. the integration of river and canal corridors

e. design for health and well-being

Is the guidance “too prescriptive”? Does the Plan reflect local and national guidance in this regard? Would the wording proposed in the relevant Plan policies be an effective means of achieving the aims and objectives of the Plan?

- a. To achieve the densities required at Meridian Water it is expected that tall buildings will be part of the urban fabric. Policy EL11 provides a specific approach for Meridian Water which is aligned with the wider policy framework including Enfield’s DMD 43 and draft London Plan Policy D8.
- b. Within the new urban neighbourhood of Meridian Water active frontages have an important role ensuring buildings relate to their broader environment and provide a safe, welcoming and engaging experience for the population. Active frontages are fully supported by the draft London Plan (Policy D1) and will be necessary if the requirements of NPPF (2018) guidance on well-designed places (paragraphs 124-127) is to be achieved. Particular ELAAP policies encouraging active frontages include Policies EL12 regarding active frontages facing the water and Policy EL10 regarding active frontages at ground level to the street, road or other publicly accessible area.
- c. At Meridian Water, current access to open space is limited, one of the key goals of ELAAP and development at Meridian Water is to create an opportunity to maximise access to the Lee Valley Regional Park and other open space as well as to create new open space. This is in line with new draft London Plan Policy G4, especially on the subject of addressing existing areas of deficiency. The same ambition is enshrined in ELAAP policy EL9 on Leisure Facilities and Open Space at Meridian Water and Policy EL28 on New and Existing Green Spaces. This is also in line with Core Strategy policies 30, 33, 34, 35, 37 and 38 as well as relevant DMD policies.
- d. Edmonton Leaside is crossed by several watercourses including rivers and canals. However access to and quality of many of these are poor. One of the key aspirations of the ELAAP is to provide better access to watercourses, to integrate them into the new developments and to improve their quality. This is in line with the Upper Lee Valley Opportunity Area Planning Framework 2013, the Enfield Core Strategy policies 27, 35 and 38 and Development Management Document, as well as the London Plan (particularly Policy S116) and NPPF’s definition of open space. Particular policies to ensure this include Policy EL27 on Watercourses at Edmonton Leaside and , Policy EL24 on the Use of the Waterways for Transportation and Policy EL9 on Leisure Facilities and Open Space at Meridian Water, which includes specific mention of integrating new wetland habitat, Banbury Reservoir and Policy EL12, which specifically directs development proposals and SPDs to optimise the potential of the water network including active frontages, integration of Waterways and Water Frontages with leisure uses, enhancements etc. A statement of common ground is also in preparation between the Canal and River Trust and Enfield Council.

- e. Enfield has significant health inequalities across the borough, and the ELAAP area experiences significant health deprivation including lower life expectancy. Of the key drivers behind regeneration in the area is to redress these inequalities and to improve health outcomes in this particular part of the borough in line with new draft London Plan Policy GG3 and T2 and the Mayor's Healthy Streets Approach as well as Enfield's Core Strategy Policy 7 and associated DMD Policies. A statement of common ground between the Council and Healthwatch Enfield is being drafted which additionally enshrines commitment to this matter.

iv. Does the plan adequately reflect the need to sustain and enhance the significance of heritage assets? How has the Council considered the setting of non-designated heritage assets outside the AAP area?

The Council and Historic England have agreed a Statement of Common Ground which seeks to address the matters raised in this item.

The Edmonton Leaside area does not encompass known designated heritage assets (as defined in the NPPF). However, there is historic significance in the River Lee Navigation and associated industrial heritage, and the proposed plan area is within an Area of Archaeological Importance as identified in Enfield's Local Plan. The historical context and significance of the ELAAP area is described in brief in paragraphs 2.1.5 and 2.1.6 of the document. Core Strategy 31 and Development Management Document 44 set out the requirement to conserve and enhance heritage assets in a manner appropriate to their significance and recognise that the importance of some heritage assets is currently hidden through lack of awareness or information.

Within the past few years the Council has reviewed and updated all its Conservation Area Appraisals and Management Proposals including those for the Ponders End Mills and Enfield Lock Conservation Areas. These both lie to the north of the AAP area and the appraisals set out a detailed evaluation of the history and evolution of the River Lea Navigation and those features which contribute to their special architectural and historic interest, including their setting. Montagu Road Cemeteries Conservation Area to the west of the AAP also has a detailed appraisal setting out its significance, including the contribution of its setting. The accompanying Conservation Area Management Proposals for each of the conservation areas sets out how these areas will be managed in order to preserve or enhance their special character.

A new Enfield Heritage Strategy "Making Enfield" is also currently being prepared which will replace the 2008 Strategy. The emerging strategy includes aims and objectives, one of which is to improve understanding of the heritage value of waterways by undertaking a review of waterways and consider protection and interpretation options. "Making Enfield" is scheduled for adoption March 2019 and an area-specific heritage strategy for Edmonton Leaside is not necessary.

The Council and Historic England agreed an amendment to Policy EL11 that for tall building proposals there must be an assessment of any impact on the setting of heritage assets including those beyond the Meridian Water and borough boundaries.