

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

DOCUMENT ID5 - NOTE ON THE SECTION 19 APPLICATION

1. As explained during the relevant session of the Inquiry held on 27 April 2021, the Section 19 Certificate Application ('the Application' - **CD 5**) contains an error in relation to Plot 106 (owned by the Canal & River Trust – 'CRT'), which is the only plot comprising open space where outright acquisition is sought rather than rights. This Note is provided to the Inquiry at the Inspector's request, to document the necessary correction.
2. The error appears on both (a) Page 1 of the application, paragraph 4, which reads "*Plot 106 relates to acquisition of land forming part of the Towpath for the construction of a flood relief channel beneath the Towpath*"; and (b) Page 5 of the application, paragraph 2, which reads "*The flood relief channel will be developed underneath the Towpath...*".
3. In fact the flood relief channel will not be developed on or under the towpath. Instead, it will begin on land situated to the east of the towpath. In this regard the correct position is as set out in paragraph 8.7 of the Council's Statement of Case (**CD 4**).
4. At present, flood water escaping from the Canal currently passes over towpath. The Council's flood mitigation strategy, agreed with the Environment Agency, depends upon that situation continuing into the future. As such the Council does not seek to carry out any works on Plot 106 in this regard, but instead to simply maintain the status quo. Consequently, the Council requires the acquisition of Plot 106 only to ensure that the ground level remains unchanged on that plot, and that flood water can continue to pass over it into the future.
5. Given that no substantive works are proposed in respect of Plot 106 at all, the proposals for that plot are in fact materially less onerous than as represented in the Application.

6. The Council can confirm that the correct position is known and understood by CRT, and it is on that basis that they have reached agreement with the Council and withdrawn their objection to the Application.

ALEXANDER BOOTH QC

REBECCA CLUTTEN

27 April 2021