

Strategic Planning and Design Team
Enfield Council
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Date: 24 June 2019

Dear Sir/ Madam

Edmonton Leaside Area Action Plan – Proposed Modifications

Thank you for requesting our comments on the Edmonton Leaside Area Action Plan (AAP) Proposed Modifications Consultation 2019. We have reviewed the 'schedule of main modifications' and 'policies map' documents.

We agreed a Statement of Common Ground (SoCG) with Enfield Council in September 2018, and again in March 2019. While we are pleased to see that the majority of our suggestions have been taken on board there are a number of changes proposed that are either not aligned with those agreed in the SoCG or are factually incorrect. These have been outlined below, with proposed amendments shown in *italics*.

Main modification - MM2a

In the September 2018 SoCG both parties (Environment Agency and Enfield Council) agreed that the following wording would be inserted into policies EL3: Meridian Water Town Centre and EL12: Public Realm at Meridian Water;

“Built development (this includes buildings, walls and fences but does not have to include footpaths and landscaping) should aim for a minimum 8 metre set back from the top of the river bank, in line with access requirements of the Environment Agency, to allow for maintenance and improvements, such as renaturalisation of river banks and habitat improvement.

- Footpaths and landscaping may be included within the buffer zone, although a wider undisturbed green corridor area should be provided where possible.
- For non-main rivers, less than 8 metres set back may be acceptable, providing there is no conflict with the requirements and principles of Policies EL12 and EL27.
- Where the full 8m cannot be achieved, it should be demonstrated that appropriate Environment Agency access can be maintained and that there is no conflict with the requirements and principles of Policies EL12 and EL27.”

Rather than inserting this text under policies EL3 and EL12 it has been included within the supporting paragraphs in section 5.11.13. This text should have been inserted into these two policies as agreed. In addition the second bullet point, relating to non-main rivers, has been removed without justification.

Main modification – MM8

In the September 2018 SoCG both parties (Environment Agency and Enfield Council) agreed that the following wording would be inserted into policy EL8: Managing Flood Risk in Meridian Water: “The Council will apply the Sequential Test within Meridian

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Water at Masterplanning stage, in order to direct development to areas of low flood risk.”

This text has been inserted into policy EL8 as agreed in the SoCG. However, the following text is also proposed to be inserted into policy EL8: “More vulnerable and essential infrastructure should be located within Flood Zone 1 and 2 areas. Where this is not possible, development proposals must be shown to meet the provisions of the exception test, as set out by the NPPF.”

This additional text was not agreed in the SoCG and is not aligned with national guidance on the application of the sequential and exception tests. Clear guidance is required to ensure that new development is directed to areas of lowest flood risk, with priority given to areas within flood zone 1. We would like to see this replaced with the following: *“The Council will apply the Sequential Test within Meridian Water at Masterplanning stage, to direct development to areas of low flood risk. Where this is not possible, development proposals must be shown to meet the provisions of the Exception Test, as set out by the NPPF. Development proposals should include an assessment of the impact of climate change using appropriate climate change allowances, to ensure that future flood risk is taken into account.”*

Main modification - MM8a

The following comments relate to ‘Changes consequential to EL8’. We believe that there are some clarifications that need to be made between the Meridian Water specific policy (policy EL8) and the Area-Wide Policy section relating to flood risk (section 13.4).

1. Paragraph 5.9.5 has been significantly amended to include text not agreed in the SoCG. It is incorrect to imply that climate change allowances are an Environment Agency requirement (these allowances are produced by the Environment Agency on behalf of the government to support the NPPF) and that the Environment Agency is under an obligation to provide revised fluvial modelling for the Meridian Water area.

We would like to see this paragraph replaced with the following: *“Development proposals should include an assessment of the impact of climate change, using current climate change scenarios, over the lifetime of the development so that future flood risk is taken into account. Developers should submit a Flood Risk Assessment in line with the requirements of the NPPF. The sequential approach should be applied within each site to locate development in areas of lowest flood risk, taking into account all sources of flood risk.”*

2. An additional sentence should be added to the end of paragraph 5.9.7 to better align with national policy: *“Compensatory volume should be provided on a level-for-level or volume-for-volume basis.”*
3. We believe that section 13.4 of the Edmonton Leaside AAP should contain an Area-Wide Policy for managing flood risk. Currently the flood risk policy (EL8) within the AAP only manages risk within the Meridian Water development.

A lot of the proposed text under section 13.4 relates to Meridian Water only. We suggest that the proposed new text is removed from this section (paragraphs 13.4.1-13.4.3) and that paragraph 13.4.4 is simply amended as follows to avoid duplication: *“Chapter 5, Policy EL8, sets out detailed policy guidance on how development in Meridian Water should respond to flood risk issues. These same principles for the effective management of flood risk will be applied throughout the Edmonton Leaside area in line with national policies and guidance.”*

Alternatively, policy EL8 could be split into two policies, one specific to Meridian Water and one Area-Wide Policy to address flood risk. We apologise for not recognising the lack of an Area-Wide Policy in previous versions of the draft AAP and would be happy to discuss this in greater detail.

Further comments

We also have some minor comments that we recommend are included in the final iteration of the Edmonton Leaside Area Action Plan;

- A number of figures included in the draft document incorrectly indicate the location of the new Meridian Water Station. These suggest that the station will be/ is located in the same place as the former Angel Road Station.
- Finally, please ensure that watercourses and waterways are listed in the key of the 'policies map' document.

Thank you again for consulting us. Please don't hesitate to get in touch if you have any questions on the above response.

Yours sincerely

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