

Please reply to: James Gummery

Anne Jordan
Inspector

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Date: 11th June 2018

Dear Ms Jordan

EDMONTON LEESIDE AAP EXAMINATION

I write in response to your letter of 24th May regarding your initial observations.

Background Information

As requested, please find accompanying this letter an up-to-date land ownership plan for Meridian Water.

The Council continues to pursue engagement of a preferred development partner through ongoing negotiations with the developer PCPD; the matter is scheduled for a Cabinet decision in late July.

Duty to Cooperate

Enfield Council engages with neighbouring authorities and other statutory consultees through a variety of channels. Notification of consultation is given on all Local Plan consultations, and followed up with the offer of a meeting. Specific regeneration and infrastructure programmes also generate cross-boundary and stakeholder meetings.

Where inter-borough forums are established, for example the Six Authorities Liaison Group (comprising Enfield, Essex and Hertfordshire councils), Enfield plays an active role and meets regularly with adjoining authorities which focus on cross-boundary planning and transportation issues.

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The Council is a long-standing member of the group of seven local authorities which are jointly preparing the North London Waste Plan. The Waste Plan will set out the planning framework for waste management in the North London boroughs for the next 15 years and will identify sites for waste management use. There is very regular contact at numerous levels, including: Planning Officer Group meetings around six times per year; Heads of Service Group meeting around three times per year; while the Planning Members Group meets annually. These meeting frequencies may vary according to the particular demands of the work.

The Council's regeneration officers and senior managers continue to engage in meetings with Haringey Council to progress regeneration delivery at Meridian Water. A twice per year meeting with Haringey Council's regeneration team is used to discuss best practice at Meridian Water and the adjoining area of Northumberland Park in Haringey. During 2016/17 the Meridian Water Regeneration Team and Haringey Regeneration and Transport teams met regularly to progress the purchase of unoccupied Haringey land to provide access for the new Meridian Water Station.

It should also be noted that the London Borough of Haringey were consulted on the Phase 1 Meridian Water application at Willoughby Land in 2016/17; no comments were received.

The Council has met regularly with the Lea Valley Regional Park Authority (LVRPA) which is a major stakeholder in the area. Meetings have been held on the Edmonton Leaside AAP at each stage of preparation, including discussions on the important Picketts Lock site.

Regeneration and development at Meridian Water has been supported through the Upper Lee Valley Opportunity Area Planning Framework (ULVOAPF) and succeeding London Plans. During preparation of the ULVOAPF (2013) there was close, cooperative contact between the Council and GLA.

The Edmonton Leaside area is of great significance to the GLA for housing and jobs. Regular meetings have taken place with the GLA to ensure coordination on key elements of Meridian Water, for example a quarterly meeting to exchange information and updates on Meridian Water progress, including safeguarding funding for Meridian Water station.

The Council is also part of the 'Local London' group which is a quorum of east London boroughs seeking to plan for sustainable and inclusive growth.

Council officers met with the Environment Agency in June 2017 to discuss their AAP consultation representation.

Habitat Regulations Assessment

Following ELAAP submission I have spoken with Natural England regarding their consultation response and agreed to draft text addressing their concerns relating to possible recreation disturbance impact at the Walthamstow Reservoirs Ramsar site.

The HRA was carried out before the CJEU judgement on the '*People over Wind, Peter Sweetman v Coillte Teoranta*'. We will consider our screening assessment in light of this case, and review our HRA approach.

Sustainability Appraisal

The Edmonton Leaside AAP has been prepared in the context of major trends in the borough and London-wide requirements for significant levels of housing, jobs and supporting infrastructure. Very significant increases in population have driven Enfield's housing needs much higher than was allowed for the 2010 adopted Core Strategy (see the next section for further detail).

The evidence base for the ELAAP therefore considers how the borough's key regeneration location at Meridian Water can be developed in a way which optimises the land use. The development must also support viability of essential transport infrastructure improvements, in particular the new station and improved rail service.

Achieving a high number and density of housing and jobs means taking a comprehensive approach to land uses within Meridian Water. Land currently designated SIL is too restrictive in terms of employment type and density potential, and a more flexible approach of mixed use development is required to grow employment and raise quality of jobs, as well as achieving a high quantum of housing.

Given the acknowledged changes to housing requirements, the Sustainability Appraisal focuses on the options for greater housing delivery, and does not pursue the figure of 5,000 homes at Meridian Water already established in the Core Strategy.

To not de-designate any SIL at Meridian Water would very significantly constrain the site's potential, to the point of endangering its viability. I would also point out that the GLAs response to the 2015 AAP consultation did agree to at least partial SIL release. Assessing an option of full SIL retention in the SA was therefore not seen as necessary.

The Causeway route has been developed to respond to the regeneration requirements of the site. The route set out in the ELAAP responds most effectively to the requirements of the new development and restrictions of the site. In particular the route must be centrally located within the development if it is to provide the attributes of good transport access for all parts of Meridian Water. Other routes do not meet the needs as effectively in terms of traffic movement, pedestrian accessibility, and response to site constraints such as the Thames Water tunnel. A further assessment of other routes through the SA process was therefore seen as unnecessary.

The SA should assess reasonable alternatives - rather than all possible alternatives - and given the reasons set out above, the Council is satisfied that the SA has achieved this for plan-making purposes.

The SA process has informed the AAP over the course of its preparation. This includes the SA Scoping Report, where the process of identifying Sustainability Issues and selecting Sustainability Objectives has in itself steered the course of the AAP – for example in the objective to 'improve efficiency in land use', or to 'sustain economic growth and competitiveness'. The SA undertaken for the 2014 AAP document appraised the options of releasing/ not releasing industrial land, and found positive sustainability effects from releasing SIL.

Consistency with the Core Strategy and Quantum of Development

Since 2010 when the Core Strategy was adopted Enfield has undergone a very significant shift in evidence and policy context on population and household requirements.

At the time of the Core Strategy the GLAs housing requirement for Enfield stood at 560 units per annum. This subsequently increased to 798 units per annum in the 2015 London Plan, with the Draft London Plan (2017) boosting this much further to 1,876. These higher housing targets reflect the large rises in population growth experienced by the borough in recent years.

The Edmonton Leaside AAP certainly reflects the approach of Enfield's emerging Local Plan, which seeks to provide for a rising population and higher housing requirements. Meridian Water provides a suitable brownfield location for a large quantum of high density housing.

The spatial scenarios set out in Table 3.1 of the *Evidence on Housing and Supporting Infrastructure* are based on developable land calculated from a spatial analysis of Meridian Water. Greater detail is provided in the *Scenario Testing* document section 4.2.

In consideration of the assumptions underpinning the evidence base work:

1. It was assumed that the large retailers Tesco and Ikea will continue with their existing operating floorspace, but that their car parking would be re-provided at around 80% through multi storey facilities to increase development densities.
2. While the consultation zones identified by the Health and Safety Executive are within the Edmonton Leaside AAP area, they all lie outside of the Meridian Water boundary, and were not taken into account in assessing development capacity.
3. The assumption did not include restrictions due to underground infrastructure. The approach assumed such infrastructure could be taken into account through the design and development approach – for example see the design of the Causeway route to sit above the Thames Water Tunnel on the east of the site.
4. The issue of source protection zones was considered in the Phase 1 application at Willoughby Lane, and addressed through conditions agreed with the Environment Agency. While SPZs must be taken into account for development proposals, these can be addressed through mitigation measures and monitoring developed in consultation with the EA. The scale of the Meridian Water site also means there will be opportunities for locating development in the most suitable place. The assumptions for the evidence therefore did not place restrictions based on SPZs.

5. Evidence modelling is on the basis that flood risk will be managed through a mix of on-site and off-site measures; it should be noted that flood risk was mitigated for in the Phase 1 application at Willoughby Lane (ref 16/01197/RE3).

Regarding the *Scenario Testing* document section 2.3 on the delivery of social infrastructure, the reference to 90% delivery as a minimum was intended to give some realism in addressing social infrastructure targets (e.g. you can't provide 1/2 a school class) and allow for the fact that some demand will be met offsite. The 80% minimum provision per individual phase is that site constraints and the need to phase development may limit the capacity of the overall development to meet all infrastructure demand equally at different stages; for example, by the time half the development is built more school places may have been created but a shortfall may exist in Doctors surgeries. The 80% minimum per phase was an attempt to discourage delivery being pushed into later phases, to ensure a reasonably even spread of provision across the site, yet give some flexibility to reflect phasing constraints.

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. It is acknowledged that as it stands this area does not constitute publicly accessible open space, and that to make it so would require discussions with landowners and a change of use.

Housing

Amending the Policy EL1 reference to a minimum of 35% affordable housing will remove ambiguity from the policy wording to align with the London Plan approach. The sentence will simply state: '*All residential development proposals at Meridian Water will be expected to achieve a minimum of 35% affordable housing.*'

Industrial Land

The *Evidence Base for Employment Land, Industries and Jobs* document provides the key evidence for potential job generation at Meridian Water and there are no further documents at this time.

The Council continues to explore the potential for attracting and growing new economic sectors. There is inevitably a level of uncertainty on future industries and employment as Meridian Water is seeking to attract new employment sectors in the context of the wider economy which continues to rapidly evolve.

Flood Risk

While the Environment Agency has introduced new climate change allowances, its updated flood risk modelling will not be ready until 2019. The Council is currently updating its Level 1 SFRA and, once the EA can provide revised modelling, the Council will update the Level 2 SFRA.

The Council's high-level sequential test demonstrated that development is necessary within Meridian Water to meet Enfield's strategic objectives. The Sequential Test will be applied within the site, steering development towards areas of low flood risk, but where this is not possible the Council, in consultation with the EA, will need to be satisfied that the Exception Test can be passed. This is being applied on a site-by site basis, which was the approach taken for the Phase 1 application at Willoughby Lane (ref 16/01197/RE3).

The AAP Policy EL8 seeks an integrated and sustainable approach to the management of development and flood risk through complementary flood mitigation and water management measure. There is also policy support for provision of off-site storage.

The ELAAP Spatial Framework (indicative masterplan) was in drawn up to show potential approaches to land use across the Meridian Water site, and as such the design was not subject to flood risk assessment.

Transport

As discussed in the earlier section on Sustainability Appraisal, the Causeway route has been developed to respond to the regeneration requirements of the site. The route set out in the ELAAP responds most effectively to the requirements of the new development and restriction of the site. In particular the route must be central to the development if it is to provide the attributes of good transport access for all parts of Meridian Water. Other routes do not meet the

needs as effectively in terms of traffic movement, pedestrian accessibility, and response to site constraints such as the Thames Water tunnel.

The strategic road network referred to by Highways England is a considerable distance from Edmonton Leaside and Meridian Water; it is approximately 6km to the M11 and M25 and 13km to the M1. As such, while there could be an impact, the distances involved mean this is likely to be limited.

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 is worth noting at 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 progresses.

Edmonton Eco-Park

The revised text is provided in the accompanying document; I trust this is the section you were referring to, but please let me know if otherwise.

Individual Policies

The Council accept that the AAP policy wording referring to Supplementary Planning Documents should not, in a number of cases, be phrased in a way that requires compliance. I propose amending or removing these SPD references through the schedule of minor amendments.

Proposed Modifications

The Council note your guidance on maintaining a separate schedule for any main modifications as a live document throughout the examination process and posted on the Examination website. I also note the need to keep a separate running schedule of any changes to the Policies Map.

Since the production of the Regulation 22 Statement we have met with the Lee Valley Regional Park Authority to discuss their response to the AAP; I do not expect any main modification to the AAP to result from this meeting.

I am contacting other representors and over the coming weeks expect to progress with further meetings and preparation of Statements of Common Ground with key stakeholders.

I hope that this response clarifies the points you raised, but please let me know should you require further information.

Yours sincerely,



James Gummery
Principal Planner

IMPORTANT – Enfield residents should register for an online Enfield Connected account. Enfield Connected puts many Council services in one place, speeds up your payments and saves you time – to set up your account today go to www.enfield.gov.uk/connected