

Jacqui Glover
Programme Officer
Edmonton Leaside Area Action
Plan Examination

Our ref: 100445
Your ref:
Date: 18 September 2018

Dear Jacqui

Edmonton Leaside Area Action Plan Examination

Inspectors Questions

Thank you for submitting these questions to us which we received on 18 July 2018.

Issue: Whether the preparation of the Plan has complied with the duty to co-operate imposed by S33A of the Planning and Compulsory Purchase Act 2004, as amended. Whether all the other legal requirements of the 2004 Act (as amended) and the 2012 Regulations have been met.

- i. Is the evidence base relating to flood risk up to date?

No. Both the Level 1 (published 2008) and Level 2 SFRA (published 2013) are considered to be out of date. This is because in 2015 updated guidance for climate change was published, setting out the different climate change allowances that need to be factored in when considering future flood risk - this applies to both fluvial and surface water flood risk. Existing Environment Agency flood models for this area have not been updated to account for the revised climate change allowances due to a lack of funding. There is a long-term project to merge the various Lee models around this area and re-run with the increased flow representing the various climate change scenarios, but this is not expected within the next couple of years. It is important that the most recent climate change allowances are considered when making any planning decisions, as this is necessary to be able to meet the NPPF (paragraph 149) requirement of taking the long-term implications of flood risk into account. However, Arup are already looking to re-run existing EA models with increased climate change for Phase 2 of the Meridian Water development, although this does not currently cover the wider Edmonton Leaside area.

- ii. Are there any important developments/changes since the submission of the plan?

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No, as far as we are aware there have not been any developments or changes since the submission of the plan.

Issue: Whether the policies in the Plan are consistent with the aim of the Framework, to mitigate and adapt to the effects of climate change?

- i. Is the 2013 Strategic Flood Risk Assessment (SFRA) and the recommendations within it a sound basis on which to base the comprehensive redevelopment of the site?

The recommendations within the 2013 SFRA are sound, but this requires them to be based on up to date information, with the correct climate change allowances being used to consider future flood risk. However we appreciate our existing flood models for the area have not been updated yet to account for the revised climate change allowances.

- ii. 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" Is this approach realistic or appropriate for Meridian Water, given the high densities proposed?

It is difficult to say whether or not the approach is realistic without knowing the expected impact of the climate change scenarios. Once climate change has been taken into consideration, we could see the floodplain extending into previously unaffected areas, as well as a greater depth of flooding in those areas already at risk. Based on current modelling of the 1 in 100 year 20% climate change scenario then the sequential approach within the site itself does seem realistic, and we would recommend this wherever possible, but it is unclear what the 1 in 100 year 35% and 1 in 100 year 70% climate change (recommended allowances) scenarios will look like on the site.

- iii. How does this approach accord with the guidance in paragraph 104 of the framework?

Paragraph 104 of the previous version of the NPPF stated 'for individual developments on sites allocated in development plans through the Sequential Test, applicants need not apply the Sequential Test'. However, we would strongly advise that the ST is still undertaken for individual sites within the Meridian Water area due to its size and the level of flood risk within the area, which is expected to increase once the most up to date climate change scenarios have been taken into consideration. Although this does not accord with the NPPF, the level of flood risk within Meridian Water should not be overlooked when siting individual developments, as we would expect to see the most vulnerable uses being located within areas of lower flood risk.

- iv. Does the plan strategy in relation to flood risk adequately reflect cumulative flood risk and the aim of reducing flood risk?

No, it doesn't reflect cumulative impact as it doesn't assess the updated climate change effects. The storage area proposed in Lee Valley Park will be designed to make flooding no worse, it won't result in a flood risk reduction. Also, policy EL8 focuses on the 'management' of flood risk and that developments should not increase flood risk elsewhere; there is no mention of reducing flood risk.

- v. Does the plan make realistic assumptions about upstream and downstream flood storage?

The original idea from the local authority was to create an upstream storage area which has been replaced in favour of a storage area adjacent to the site at Lee Valley Regional Park. Realistic assumptions have been made as far as they have broadly assessed that there will be space to provide the required storage so that flood risk is made no worse (but not reduced). Downstream storage is not a factor.

- vi. Should the plan to make specific provision for flood risk infrastructure and surface water drainage?

No the plan does not need to make further specific provision for flood risk infrastructure aside from that already identified. The storage area set aside in Lee Valley Park could be made larger if necessary for climate change mitigation as there is sufficient space. The provision of surface water drainage infrastructure should be informed by the Surface Water Management Plan recommendations, which the Lead Local Flood Authority would lead on.

- vii. Should the plan make specific provision to address issues relating to land contamination within the plan area, including the potential effects of development in SPZ's?

We set out in our response to the proposed submission consultation the specific environmental constraints present in the plan area, including the groundwater aquifers (Thanet formation and Lambeth Group secondary aquifer overlying the chalk aquifer), the variation in thickness of the London Clay which can offer a level of protection, and the potential for contamination due to the legacy of historic industrial uses. Groundwater Source Protection Zones are zones surrounding an abstraction point for public water supply and denote the travel time for water and pollutants to reach the abstraction point from source. For example, there is a 50 day travel time for water and pollutants to reach the abstraction point in Source Protection Zone (SPZ) 1 and therefore it is the most sensitive zone. SPZ1 and SPZ2 are both present within the plan area surrounding a number of permitted abstraction points for public water supply.

Therefore we think the plan should make specific provision to address issues relating to land contamination in the plan area, however we recognise that there is a borough wide policy (DMD 66 Land Contamination and Instability) within Enfield's Development Management Plan adopted 2014. DMD 66 sets out the specific requirements for planning applications where land contamination may be present, including initial assessments followed by further site investigations and remediation strategies. Therefore we no longer consider it necessary to include a standalone policy to address land contamination including the requirement to submit a Preliminary Risk Assessment. We will continue to work with the Council on the emerging Local Plan to ensure the issue of groundwater protection and land contamination is considered across the borough.

We have however asked the Council to consider additional wording for Policy EL11 Building Form at Meridian Water (Part C) to acknowledge that the underlying ground conditions and presence of contamination may impact on the design of tall buildings specifically the depth of foundations. The Council has recognised this issue may impact on the height of tall buildings and density and we acknowledge technical assessments can be carried out at the masterplanning stage and site specific proposals. However, without some reference to this in the ELAAP we are concerned this issue will be overlooked or not considered significant in the masterplanning stage or site specific proposal stage. We refer the Inspector to refer to the Statement of Common Ground for

further explanation and our recommendation which we consider would fully address our concern.

- viii. Does the Plan consider fully the potential for waterway movement through the site?

It is not entirely clear what is being referred to here, but if it is in relation to navigable waterways, that is more of a question for the Canals and Rivers Trust.

Is there a potential conflict with the aims of flood avoidance and biodiversity improvement?

Potentially, however, there should be solutions to this if considered carefully. We are in favour of biodiversity improvements provided it can be ensured that flood risk will not be compromised, either through reduction in channel / floodplain capacity, or impact on any flood defence structures. There may be options to explore where flood storage can be increased as well as providing biodiversity gains, such as providing shallow floodable areas next to the watercourse, or regrading banks, for example on the inside of meanders, to provide channel capacity improvements and new marginal habitat. Any biodiversity improvements considered that may impact on flood flow will likely need to be supported by hydraulic modelling to demonstrate that there will be no increase in flood risk as a result.

Yours_sincerely

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