

Submission Edmonton Leaside Area Action Plan

Schedule of Responses in Plan Order

Plan Order Summary of Consultation Responses to Proposed Submission Edmonton Leaside AAP

Responses received during the public consultation March to April 2017, under Regulation 20 of The Town and Country Planning (Local Planning) (England) Regulations 2012.

Location in document	Organisation	Response no.	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response
Section 1.1	TfL	27	Not stated	There should be a mention of how critical bus services will be, particularly in providing east-west connectivity and in linking the site to Edmonton.	Insert a new paragraph following paragraph 1.1.5: <u>'Improved bus services will provide greatly improved connectivity with Edmonton Leaside and to the wider area, in particular supporting east-west linkages and access to Edmonton Green.'</u>
Vision	Environment Agency	23	Not stated	The vision picks up on some of the social and economic aspects, but is lacking in recognising the importance of biodiversity and how environmental enhancements can also deliver benefits in these areas.	The vision references the need for sustainable living, working and leisure. The Vision is high-level and the objectives and policy establish the more detailed approaches to biodiversity and environmental enhancements.
Vision	Vibrant Partnerships	24	Not stated	The Vision set out by the London Borough of Enfield for the area is ambitious but realistic.	Comment noted.
Figure 1.1	Thames Water	07	Not stated	Land Thames Water own at Harbet Road (to the south of the North Circular) and to the north of the North Circular and south of William	

				<p>Girling Reservoir and is indicated on the plan as existing 'Open Space'. This is incorrect and the current designation is Green Belt.</p> <p>Thames Water's land is not public open space, but is retained operational land. The only public access is where existing public footpaths exist. Part of the site to the south of William Girling Reservoir is currently being used by a third party for waste concrete recycling.</p> <p>Thames Water's strategic land assets can only be released for other uses should it be proven that they are not required either now or in the foreseeable future for Thames Water's operational use.</p> <p>Any proposals would be subject to agreement of commercial terms as Thames Water would also want to ensure they maximize the value of the land for their customers; alongside promoting wider recreational and educational aspirations that stakeholders such as the Borough may have.</p> <p><u>Proposed Change:</u> The Open Space designation on Thames Water owned land at Harbet Road (to the south of the North Circular) and Thames Water owned land to the north of the North Circular and south of William Girling Reservoir should be deleted from Figure 1.1 and throughout the ELAAP.</p>	<p>The term 'open space' is not a specific designation and does not establish a change in designation. However, the Council will seek further discussion with Thames Water to agree suitable terms to describe these locations.</p>
Objective 1	TfL	27	Not stated	Need to include references to public transport routes.	<p>Update Objective 1, 7th bullet point:</p> <p><i>'Provide well-connected, well-designed pedestrian and cycle routes that encourage people to choose active travel modes along with excellent access to public transport options.'</i></p>

Objective 5	Environment Agency	23	Not stated	<p>We have several suggestions to embed Objective 5 “Celebrating the Lee Valley Waterways and Open Spaces” and ensure that the plan incorporates the objectives and actions of the Thames River Basin Management Plan and other evidence base documents for biodiversity protection and enhancement.</p> <p>The following aspects should also be included in the plan:</p> <ul style="list-style-type: none"> - invasive non-native species and their proposed management. There are patches of invasive non-native species that will need to be addressed through development, i.e. Japanese Knotweed growth on Eley’s Estate and Willoughby Lane Gasworks. - protected species and their protection through development, primarily bat corridors. - use of green roofs and/or green walls on development sites to improve biodiversity value and visual attractiveness. 	These items are responded to through the relevant sections below.
Objective 5	Environment Agency	23		The last point of this objective should be strengthened to say " reduce " flood risk rather than just "manage" flood risk to be aligned with National Planning Policy.	Update Objective 5: <i>'Manage Reduce flood risk.'</i>
Objectives	Healthwatch Enfield	17	Not stated	<p>Enfield Council should be much more ambitious for the health and wellbeing of the local residents of Edmonton Leaside; we would like to see a new Objective of ‘Enhanced Health and Wellbeing’ added to the final Area Action Plan, in order to give this matter appropriate weight and to support Enfield Health and Wellbeing Board priorities.</p> <p>It is not clear that the proposed Area Action Plan has adequately captured the health and wellbeing benefits – including mental health resilience - of sufficient green space, restrictions on unhealthy retail outlets, environmental encouragement to walk or cycle, disincentives to drive, the need for clean air, the need for community spaces for social interaction, etc. We believe that a new Objective of Enhanced Health and Wellbeing could enable the priorities that the Health and Wellbeing Board has identified to be more fully and specifically addressed.</p>	<p>Health and wellbeing is integrated throughout the Plan, including within the objectives and policies.</p> <p>Through a number of policies the AAP requires accessible and high-quality spaces, including EL9 Leisure Facilities and Open Space at Meridian Water; EL12 Public Space at Meridian Water; EL19 Infrastructure Delivery in Meridian Water; EL20 Revitalising Open Space at Picketts Lock; EL27 Watercourses at Edmonton Leaside, and EL28 New and Existing Green Spaces.</p>

Objectives	Healthwatch Enfield	17	Not stated	<p>The Enhanced Health and Wellbeing Objective should specify that the methodology for developing and creating spaces for services in the community, including primary care, should be co-designed with local people.</p> <p>Adopting Transport for London’s Healthy Streets Approach should be a minimum standard, with additional effort being made to focus on involving people from the local area in co-designing services and spaces that many existing residents will also use.</p>	<p>Any planning proposals for community spaces would be required to undergo public consultation as a matter of course.</p> <p>See response to TfL comments below – the Council will seek discussion with TfL on reference to the ‘Healthy Streets Approach’.</p>
Para. 1.3.1	NLWA	19	Not stated	<p>The diagram in para. 1.3.1 on page 8 does not refer to the Edmonton EcoPark Planning Brief SPD – propose amending the diagram to do so.</p>	<p>The diagram on page 8 shows documents directly part of the ELAAP preparation process; the EcoPark SPD is referenced sufficiently in other parts of the document.</p>
Para. 2.1.3	Environment Agency	23	Not stated	<p>The growth planned within this action plan provides an opportunity to protect and enhance the natural capital of the Blue Ribbon Network, which should be recognised in this section.</p>	<p>Add the following text to the end of paragraph 2.1.3:</p> <p><u>‘The Blue Ribbon Network is a strategically important series of linked spaces which should contribute to the overall quality and sustainability of London by prioritizing uses of the waterspace and land alongside it safely for water related purposes.’</u></p>
Para. 2.1.10	NLWA	19	Not stated	<p>Amend paragraph to refer to the potential provision of heat for a decentralised energy network as there is not yet a formal agreement to supply heat from the EcoPark. The potential nature of the provision of heat energy should be repeated throughout the document.</p>	<p>Amend paragraph 2.1.10 5th paragraph: <i>‘Edmonton Eco Park – the redevelopment of the site to provide the next generation of waste services and expected additional community benefits through the provision of heat for a decentralised heat network;’</i></p>

Para. 2.1.11	Environment Agency	23	Not stated	The Blue and Green areas section should be expanded to ensure that improvements for nature value and wildlife are included.	Update paragraph 2.1.11 2 nd bullet point as follows: <i>'will become much more accessible and attractive <u>while improving natural habitats and biodiversity.</u>'</i>
Para. 2.16	Historic England	06	Not stated	The eastern part of the Action Plan area (the railway line and east to the borough boundary) lies within the Lee Valley West Bank or East Bank Archaeological Priority Areas (APA – also known as Areas of Archaeological Importance). This particularly reflects the presence of river valley deposits with high prehistoric and palaeo-environmental potential and also encompasses important later remains and the industrial heritage of the waterways. We support the reference to the APA in paragraph 2.1.6 but this should be followed through with references in section 5.2 to London Plan policy 7.8 and Enfield Local Plan Development Management Policy DMD44. The main known (undesigned) heritage assets are the 18th century River Lee Navigation with the 19th century Pickett's Lock and a Dark Age crannog at Meridian Water.	The Council will consider the potential for further policy references to be added to section 5.2, and will seek to discuss with Historic England.
Section 2.2, table	Environment Agency	23	Not stated	The environmental context of the area perhaps doesn't quite fit within the 'socio-economic' profile and not everything mentioned falls under the umbrella of 'flooding' - this table could be subdivided. The proposed development also presents the opportunity to remediate sites where there have been potentially contaminative uses.	Update title at section 2.2: <i>'Socio-Economic <u>and Environmental</u> Profile.'</i> Update table column: <u>Flooding Environment</u>
Sections 2.2 table and 5.7	Education and Skills	25	Not stated	EL5 relates to community facilities and schools. The supporting text suggests (based on GLA standard child yield and a minimum mix of 10,000 3+ bed homes) that three 2FE primary schools and one 8FE	Update text at Section 2.2 table, under 'Education', as the requirements are discussed later in the AAP document:

	Funding Agency			<p>secondary school would be required. This differs from the forecast demand set out in section 2.2 so may require clarification to ensure adequate provision is made for school places at an early stage of the plan. Crucially, both the supporting text and Policy EL5 identify the importance of monitoring emerging child yield as development continues so that school place demand can be updated to ensure the educational need is met depending on the mix and tenure of housing, which emerges.</p> <p>The policy and supporting text acknowledge the need for high-density development across the Meridian Water site and the resulting need for innovative design and approach to school provision. Reference is made to the size of schools being within Department of Education guidelines or as agreed with the Planning Authority. It is unclear as to what guidelines the planning authority may use and appropriate education advice should be sought in this respect as necessary. In both regards, the need for high-density development and any resultant site size restrictions should not unduly constrain or conflict with operational/educational requirements of the school/s.</p>	<p><i>'There is forecast demand for primary and secondary school places – the provision of two new 2-FE (Forms of Entry) primary schools and one 8-FE secondary school (with 6th form) will be necessary.'</i></p> <p>The approach set out in paragraph 5.7.4 is to ensure that education facilities in high-density developments meet the required standards, looking towards DoE guidance and the London Plan.</p>
Section 5.3	Christian Action Housing Association	13	Not stated	<p>Welcome the comprehensive master planning approach that is been taken to the development of a significant new neighbourhood at Meridian Water, in particular the aspiration to provide around ten thousand new homes and emphasize the need for a significant proportion of these to be affordable at rents that are within the reach of those in receipt of lower incomes. This is essential if the development is to be successful economically and the employment opportunities that are associated with it are to be filled by people living locally.</p> <p>Note that the AAP anticipates that the housing zone at Meridian Water could support further homes in the surrounding area, beyond the boundary of the Edmonton Leaside AAP. We would strongly support this approach and believe that other housing associations operating in Enfield would take a similar view.</p>	<p>Delivery of new homes is a key driver of the Meridian Water regeneration. Through providing better transport infrastructure, new jobs and a vastly improved environment, the development will support renewal and growth across the wider Edmonton area.</p>

Policy EL1	Christian Action Housing Association	13	Not stated	Strongly support the council's policy to seek 40% affordable housing units on new developments and that 70% of these should be social rent with 30% intermediate. We would urge the council to take a robust position in seeking to achieve these percentages, and indeed welcome the Mayor of London's ambition to achieve a proportion of affordable housing at 50%. We welcome the commitment under policy EL1 to avoiding poor spatial and design performance which requires buildings that do not negatively impact on the amenity of other buildings and the public realm in terms of light amenity. We believe there is a careful balance to be struck here in order to maximise the density of housing development that can be achieved without compromising the quality of housing and overall spatial design.	Comment noted, although policy EL1 requires a minimum 35% affordable housing, rising to a higher proportion in line with improvements in viability.
Policy EL1	GL Hearn on behalf of Tesco Stores Ltd	14	Not stated	Welcome the Council's acknowledgement that the level of affordable housing that can be achieved within the Opportunity Area is subject to viability, and that a reduced number of affordable housing units are likely to be delivered during initial phases of development to address viability requirements. Also welcome the Council's acknowledgement on the role that Private Rented Sector homes can perform in meeting specific housing needs of some parts of the community, including affordability needs.	The Council is committed to delivering affordable homes at Meridian Water.
Policy EL1	GL Hearn on behalf of Tesco Stores Ltd	14	Not stated	The existing Tesco Extra at 1 Glover Road represents a key redevelopment site within the Opportunity Area. Indeed, the site occupies an important position on the proposed 'Causeway', the redevelopment of which will reinforce the role of Meridian Water and provide important linkages within the surrounding area. It is strongly contended that the residential-led redevelopment of the site will perform a significant role in the regeneration of the Opportunity Area. As such, in accordance with the objectives of Policy EL1 of the ELAAP and the London Plan (2016), it is considered that	The ELAAP supports delivery of new homes and mixed uses at Meridian Water. The Council will seek discussions with Tesco on the potential for the store site to be redeveloped at a significantly higher density, in accordance with Local Plan and London Plan policy requirements and design guidance.

				residential densities in excess of 1,100 habitable rooms per hectare are appropriate to reflect ambition of the site.	
Policy EL1	GL Hearn on behalf of Tesco Stores Ltd	14	Not stated	Given the important role that the Meridian Water Opportunity Area is to perform in meeting general housing need within the borough, it is important that the Council's housing mix requirements do not restrict the viability of key sites within the Opportunity Area. Therefore welcome the Council's acknowledgement that the level of 3+ family units may need to be reduced in initial phases to meet viability requirements.	Policy EL1 supports the development of Meridian Water as a mixed community, balancing the needs of a range of households.
Policy EL1	Barratt Homes	15	Not stated	<p>Part A: Affordable Housing Recognise the policy approach towards 35% minimum affordable housing at Meridian Water, but to be consistent with National and Regional Policy, it would be sound to ensure that the consideration of viability forms part of the consideration of delivery (NPPF paragraph 173).</p> <p>Support the recognition that due to site remediation costs and low property values, viability requirements for development proposals may reduce the proportion of affordable housing below the Council's adopted policy. This however may not simply be across "initial phases" as all phases will incur these constraints and therefore reference to "initial phases" should be removed.</p> <p>Part B: Capacity for Housing</p> <p>Welcome reference to the delivery of 10,000 new homes, albeit consider that this should be a minimum target.</p> <p>Part C: Housing Mix The policy requires "initial phases" of Meridian Water to deliver 25%+3 units. This should be subject to viability.</p>	<p>The 35% affordable housing is a position established by the Mayor of London - the Draft London Plan does not require a viability assessment for affordable housing provision at this level.</p> <p>The Council expects viability to rise as the development builds-out due to significant investment and improvements in accessibility, supporting facilities and the quality of the environment.</p> <p>The number of potential new homes referenced in Policy EL1 is a possible outcome, based on the evidence base modelling.</p> <p>Providing a range of housing sizes is important to ensuring a mixed and integrated development. 25% 3+ bedroom homes is a minimum.</p>

Policy EL1	Canal & River Trust	18	Sound	<p>We remain concerned that Policy EL1 section -</p> <p><i>Higher density development should be situated in areas with higher levels of accessibility to public transport and/ or where it can capitalise most appropriately on features such as views and open space</i></p> <p>- favours an approach to development that gives priority to views (largely private, we assume) from new residential buildings rather than the public views from the open spaces of the Lee Valley. These need to be taken into account in determining where high density development is appropriate. We suggest that this section of the policy is inconsistent with Policy 30 of the Council's Core Strategy, which requires that "all developments and interventions in the public realm must be high quality and design-led, having special regard to their context".</p>	<p>This element of Policy EL1, in terms of the need to locate in areas of high public transport accessibility, is simply reflecting the accepted approach to density, and which is set out in the London Plan.</p> <p>The policy does not seek to prioritise good views from the units for a particular tenure of housing. Good access to open space is a necessary factor in designing and locating residential developments.</p> <p>The design of any development must have regard to design factors, including Core Policy 30, and the design policies EL10, EL11 and EL12 of the ELAAP.</p>
Policy EL1 Part B	Environment Agency	23	Not stated	<p>Ground conditions and previous contaminative uses in some areas may limit the depths for foundations and in turn the number of storeys which can be built, thereby limiting density.</p>	<p>Technical constraints will be examined during more detailed site assessments. The extensive area of Meridian Water will mean certain locations are more suitable for taller buildings, based upon a range of factors which may include contamination and potentially limitations on foundation depth.</p>
Policy EL1	GLA	27	Not stated	<p>The requirement in Policy EL1 to achieve a minimum of 35% affordable housing and to work towards 50% is supported. However, the wording around the 35% reference is unclear and should be clarified.</p>	<p>The Council will seek further discussion with the GLA on wording in Policy EL1 relating to 35% affordable housing.</p>
Para 5.4.8 – 5.4.10	IKEA PI Ltd	16	Unsound	<p>The Plan does not adequately acknowledge the valuable contribution retailers make towards employment or protection of existing businesses. Suggest amendment to paragraph 5.4.9:</p> <p><u>Additionally, the uses supporting residential development will result in hundreds of new FTE jobs being created, mainly in retail and</u></p>	<p>The Council will make amendments to paragraph 5.4.9 as set out in the <i>Schedule of Minor Amendments</i>, item no. 16, to reflect the importance of existing retail jobs.</p>

				<u>education, but also in the health, transport and leisure sectors. It is considered that job creation in the retail sector will continue to make a valuable contribution towards employment and economic growth in Edmonton”</u>	Job creation will be in a variety of sectors, so additional emphasis on retail is not required.
Section 5.4 and Policy EL2	GL Hearn on behalf of Tesco Stores Ltd	14	Not stated	Tesco is an important existing employer within the Meridian Water Opportunity Area providing a high number of employment opportunities in the area at present. Our client is keen to maintain their existing operations within the Opportunity Area, with opportunities to increase employment opportunities through the redevelopment of the existing Tesco Extra increasing employment and job growth. Therefore fully supportive of the Council’s employment aim of 6,000 – 7,000 net jobs and feel they can contribute to delivering this target.	Increased employment opportunities are a key objective of the ELAAP, particularly at Meridian Water. Retail jobs provide a significant portion of the existing employment offer in the area, and will continue to contribute to this in the future.
Policy EL2, Section 6.4, Figure 6.1 and Table 6.2	LaSalle Investment Management and Aytans MFG Co UK Limited. (Turley)	10	Unsound	<p>The intention to achieve 6,000 new jobs at Meridian Water is an aspiration with no firm basis in evidence. The proposal to de-designate approximately 9.5 hectares of land at the Stonehill Estate (part of the Harbet Road industrial estates) as Strategic Industrial Land (SIL) to assist in achieving this employment figure is not justified and is unsound. The land is required as part of the reservoir of industrial land of strategic importance.</p> <p>Policy EL2 is directly counter to the Development Plan position and ULVOAPF that the protection of SIL in this location is as important to the success of the growth areas as the new mixed-use developments proposed. Also, no recognition is given to the extant outline planning permission ref. APP/Q5300/W/14/3001257 granted for more than 46,000 sqm of B1c, B2 and B8 use at the Stonehill Estate.</p> <p>The reasons for the proposed de-designation of the Stonehill Estate as part of the Harbet Road industrial estates is not sound due to:</p> <ol style="list-style-type: none"> 1. The evidence base is not clear or sufficiently persuasive or robust to justify a realisable aspiration of 6,000 new jobs within the Meridian Water area on which to base de-allocation proposals; 	The policy framework for this AAP is long established, a commitment adopted by Core Strategy Policy 37. Furthermore, the Council’s adopted local plan identifies Meridian Water as a place shaping priority area focused on addressing deprivation in some of the most deprived communities in London. Meridian Water is a transformational regeneration project that has been endorsed by the Mayor of London and supported through the ULVOAPF. Provision of new jobs is necessary to ensure Meridian Water is a successful and diverse entity, and avoids becoming simply a dormitory from where the residents must commute to seek work. Due to the restrictive nature of SIL designated land, the approach at Meridian Water must be for mixed-use areas which allow employment, residential and social functions to exist in close proximity.

			<ol style="list-style-type: none"> 2. Employment land within Enfield Borough and at this location provides a critical resource of more than sub-regional importance and the quantum of this has been declining. It has been released above the target release rate and the SIL allocation for the Stonehill Estate should be maintained; 3. There is a proven economic need for logistics and distribution uses in this location and this need will increase as population numbers and densities increase; 4. The Stonehill Estate is ideally suited to accommodating employment uses – particularly for industrial, logistics and manufacturing; and 5. Industrial, logistics and manufacturing uses at the Stonehill Estate can contribute directly to the economic and employment objectives for Meridian Water by generating high quality skilled jobs and will not compromise the delivery of other objectives for Meridian Water in the ELAAP. <p>The continued allocation of the Stonehill Estate as SIL is important to support employment and economic growth in Meridian Water. The type of businesses it will accommodate and the quality and diversity of jobs created are entirely compatible with the delivery of employment objectives for Meridian Water in the Development Plan. It will not unduly prejudice delivery of intentions for other parts of the ELAAP at Meridian Water, such as the delivery of new homes.</p> <p>The alterations required to the ELAAP which should be made are:</p> <ul style="list-style-type: none"> • Re-wording of Policy EL2 and section 5.4 to reflect retention of the SIL allocation within Meridian Water – for at least 50% of the SIL area. If 50% is to be retained, the Stonehill Estate should retain its SIL allocation for reasons that: It benefits from an outline planning permission for SIL-appropriate uses and is more easily accessible to the North Circular. Furthermore, employment buildings can provide a beneficial screening buffer function to residential and other noise-sensitive uses from the environmental effects of the traffic using the North Circular; 	<p>The need to provide additional housing due to an increasing population, and persistent issues of inequality in the east of the borough, require the ELAAP to pursue a fresh approach to land use within the Meridian Water boundary.</p> <p>It is not a requirement for the ELAAP to reference planning permissions within the plan area, including the outline permission at Stonehill granted at appeal in 2015.</p> <p>While the demand for logistics industrial uses within the Upper Lee Valley is recognised, Enfield will continue to provide a large quantum of classified industrial land within ELAAP and the wider eastern corridor. The critical factor at Meridian Water is the long-established regeneration, supported by adopted policy to provide a large quantum of new homes and jobs through transformational change.</p> <p>The Council considers that the full release of SIL at Harbet Road is of such importance to support the successful regeneration and the step change required to viably delivery both the quantum of housing and uplift in employment opportunities. Releasing a lower proportion of SIL land would lead to a sub-optimal outcome and would undermine the delivery of sustainable communities.</p>
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				<ul style="list-style-type: none"> • Include reference to the Stonehill Estate under Policy EL15 and policy wording which is supportive and encouraging of redevelopment and enhancement for SIL compatible uses; and • Revision to the ELAAP Policies Map and Figure 6.1 accordingly 	
Section 5.4, Policy EL2, Section 6.4 and Figure 6.1	GLA	27	Unsound	<p>While the intention to increase housing is supported, this needs to be considered against the proposed loss of SIL. Enfield’s industrial land release benchmark in the GLA’s Land for Industry and Transport SPG is 33ha (2011-31). The GLA’s Industrial Land Supply and Economy Study (2015) indicates that 22ha of industrial land (designated and non-designated) was released 2010-2015. The Study also indicates that a further 24ha (excluding the 18ha at Harbet Rd) is identified for potential release through the ULVOAPF (2013), which is considerably above the London Plan/ SPG benchmark. Transport improvements on the West Anglian Main Line, potentially including Crossrail 2, are expected to lead to further pressure for industrial land release in Enfield.</p> <p>Evidence in the GLA’s Land Demand Study (2017) suggests positive demand for industry and warehousing in Enfield for 2016-41. Harbet Road estates benefits from direct access to the A406 which gives the location a strong qualitative advantage for logistics and industry and it plays an important function as part of the wider SIL in this area. The northern part of Harbet Road estate was granted outline planning permission on appeal in 2015 for 46,451sqm of industrial floorspace, indicating the site is both viable and attractive for this type of use. The southern part of the site contains a bus depot, which needs to be relocated within the Meridian Water Masterplan area to support the growth envisaged within the AAP.</p> <p>The land proposed as replacement SIL at Deephams STW (34) cannot be considered as new SIL capacity as the site is in use for utilities infrastructure, and is therefore not compensation for the loss of SIL at Harbet Road which supports ‘core’ industrial and warehousing/ logistics functions. The three smaller sites (4ha) could contribute to industrial capacity, however these would not be an effective</p>	<p>Transformational regeneration at Meridian Water is a longstanding aim which is agreed by both Enfield Council and the GLA, and is included in both Enfield’s Core Strategy (2010) and the London Plan.</p> <p>Meridian Water has been awarded Housing Zone status funding by the GLA, recognising the importance of this location to providing homes not only for the borough, but on a London-wide basis.</p> <p>There is also a great need in this part of the borough to provide more jobs, and higher-paying employment opportunities, to address the high levels of deprivation relative to other parts of Enfield and London.</p> <p>Extensive modelling work indicates how a high quantum of new homes and jobs can be achieved at Meridian Water if the whole of the site can be used with greater flexibility.</p> <p>Designated SIL does not allow the flexibility of uses that Meridian Water requires to achieve effective delivery and its regeneration aims. The SIL at Harbet Road has led to a low density, and often low value, of employment. The Draft London</p>

				<p>replacement for the loss of SIL at Harbet Road due to their smaller size, lesser accessibility and fragmented nature.</p> <p>The GLA cannot support such a large-scale loss of SIL until there is a full consideration of the potential SIL/ industrial land reconfiguration across the whole of the Upper Lee Valley. This is being undertaken as part of the ULVOAPF; while Crossrail 2 is beyond the time period of the AAP, the OAPF will consider how Crossrail 2 will facilitate the growth anticipated.</p> <p>The quantum of SIL and LSIS release and reconfiguration as detailed in Policy EL14 and table 6.2 is not currently in general conformity with the London Plan. However, GLA officers would welcome further discussions with the Council on this matter. Advice to date has indicated that the southern part of Harbet Rd SIL may be suitable for de-designation subject to the intensification on industrial and warehousing uses on the northern part; however intensification would need to be delivered prior to de-designation.</p>	<p>Plan does offer some flexibility for intensification and SIL release, which the Council is exploring further.</p> <p>The proposed SIL over and around Deephams STW is aimed more at providing a coherent area of SIL and protecting the three small sites, rather than replacement SIL per se.</p> <p>The Council will seek further discussion with the GLA on the approach to industrial land designations within ELAAP.</p>
Section 5.4, Policy EL2, Section 6.4 and Figure 6.1	TfL	27	Not stated	<p>Freight is an essential user of the road network which requires SIL in outer London to serve all of London. The Mayor is keen to reduce freight traffic in central London and manage its impacts overall. Protecting warehousing and industrial land close to key growth areas is part of that vision. If SIL is released in one part of London TfL would want to understand the effects of where those business activities would now take place, and what effects this would have on services locally and to the rest of London.</p> <p>TfL recommends that release of SIL should be considered at the London-wide scale and linked to strategic changes to the transport network beyond the life of this plan.</p>	<p>The reasons behind releasing SIL at Meridian Water are set out above in the reply to the GLAs comments.</p> <p>The Council can discuss further TfL's concerns in terms of potential impact on the transport network,</p>
Policy EL2	Barratt Homes	15	Not stated	<p>Support the removal of the Strategic Industrial Location (SIL) designation from the Harbet Road Industrial Estate and the Locally Significant Industrial Site (LSIS) designation from the southern portion of Montagu Road Industrial Estate which lies within the Meridian</p>	<p>The ELAAP document establishes the new SIL and LSIS boundaries through Figure 6.1, and the accompanying ELAAP Policies Map.</p>

				Water boundary. This is set out at paragraph 5.4.11 and illustrated at Figure 6.1. For clarity this declassification should be referenced within Policy EL2 itself, given its fundamental role to the future regeneration of Meridian Water.	Specific reference to the declassification is not required in Policy EL2.
Policy EL2	IKEA PI Ltd	16	Unsound	Requires consideration of potential impact on existing businesses and their operations. Need to consider impact on servicing accesses and visitors. Insufficient acknowledgement of value of existing retailers and contribution to local employment. Active frontage on the Causeway has the potential to conflict with IKEA's operation and access arrangements. Suggest additional bullet point within policy EL2: <u>The growth of existing retail businesses to expand their operations and provide additional job opportunities</u>	The Council will seek further discussion with IKEA on the wording of Policy EL2 in relation to existing retail operators.
Policy EL2	Canal & River Trust	18	Not stated	The policy should be corrected so that it refers to the "River Lee Navigation" rather than "Lee Navigation River". We are unclear from the AAP whether the intention is to retain the re-purposed Meridian Works buildings over the long term. We recognise that the plans and images included in the "scenario testing" document are only indicative but we note that the retained buildings are shown within them. We support the principle of re-using these buildings in the short/medium term to create more active uses of the land adjacent to the River Lee Navigation. However, longer term, the retention of these buildings may make it more challenging to deliver a high quality public realm, particularly in a sensitive location alongside the proposed Causeway Bridge. We would want to give further consideration to this through masterplanning and development management stages of the development.	Update Policy EL2, 7 th bullet point: 'Active frontages, especially along the Causeway, River Lee Navigation River and ...' The AAP does not provide this level of direction as to the future of these buildings - this will be addressed through more detailed masterplanning work.
Para. 5.4.19	Arriva London	04	Not stated	Any plan to redevelop the current bus garage site requires a replacement site to be operational before Arriva can vacate the current site. This has been accepted by the Council, but few	Enfield Council will continue to discuss the Harbet Road bus depot options with key

				<p>replacement sites have been offered, and many of those were not within the gift of Enfield Council. Arriva have not regarded any of these sites as satisfactory replacement.</p> <p>The ELAAP states that there should be no net loss of bus garage capacity. The scale of development proposed and the need stated in the AAP, most notably in policy EL23, for much improved bus services means that significant additional bus garage capacity will be needed. There is no mention in the AAP as to how or where this capacity might be provided, and recent experience raises the additional question of how planning approval for this capacity might be secured.</p> <p>The ELAAP makes much of employment issues in this area: bus driving offers employment opportunities which would be welcomed by many residents of the newly developed area.</p>	<p>stakeholders, including Arriva, as to how this facility can be relocated while maintaining the operation capacity.</p> <p>Comment noted.</p>
Para 5.4.19	Newell projects on behalf of Arriva plc	20	Not stated	<p>ARRIVA's over-riding concern is for the continuity of its operations from its existing facility, until a suitably-located alternative, of sufficient capacity, and obtained on appropriate terms, can be fully provided and commissioned. Should this objective fail to be achieved then it would be extremely disadvantageous to the continuity of Bus operations in the Borough and beyond.</p> <p>ARRIVA requires the Bus Facility to be retained in the immediate locality of the existing Facility, and a capacity of 200 buses is in order (the current Depot houses around 150), including a Bus Engineering Facility. It is logical that, in terms of operational planning for Bus Public Transport, the lead-in time for any move of Bus Facility be of suitable and sufficient length. The question of relocation of the Facility not only affects the Facility itself, but, as the Borough is fully aware, other Facilities in neighbouring Boroughs. TfL has already commented to the GLA on the matter, and there is no difference between the TfL position, and that of ARRIVA.</p>	<p>Enfield Council will continue to discuss the Harbet Road bus depot options with key stakeholders, including Arriva, as to how this facility can be relocated while maintaining the operation capacity.</p> <p>The Council will seek further discussion with Arriva on the ELLAAP with regard to the bus depot site.</p>

Para. 5.4.19	GLA	27	Not stated	The proposal to relocate the Harbet Road bus depot, as discussed in paragraph 5.4.19 should be discussed with Transport for London. TfL comments are attached as an appendix.	See TfL comments and responses.
Para. 5.4.19	TfL	27	Not stated	<p>The AAP observes the need to safeguard the Bus Depot, in accordance with the Mayor's Land for Industry and Transport SPG. TfL will advise the Mayor on whether an alternative site is suitable and will need to know it is secured for use as a bus depot before agreeing to the loss of the bus depot at Towpath Rd.</p> <p>In an area of residential and employment growth, to ensure the bus network is delivered at reasonable costs and the standards required by TfL, we need to retain and expand bus depot capacity to 200 units (buses) with associated workshops to be accommodated locally. This site would need to be operational before the existing facility could close. TfL expects planning permission for the alternative site to be secured prior to granting permission for an alternative use of the depot site.</p> <p>TfL recommends incorporating a new bus depot into the Meridian Water Masterplan.</p> <p>There are also wider benefits of retaining a bus depot on site to support locally skilled jobs and suppliers. Innovation in technology means skills will change over time so links to local training and educational institutes should be encouraged.</p> <p>TfL will not agree to the loss of the garage as part of the AAP suggest we might. We will work with the Council to make sure an appropriate bus depot is provided within the AAP area.</p>	<p>As set out in paragraph 5.4.19, the Council will engage with TfL and Arriva in finding a viable alternative site for the bus depot at Harbet Road.</p> <p>The presence of a bus depot within Meridian Water may not be in accordance with need to achieve a high density of uses and employment, and it may be more suitable to locate in the wider ELAAP area. Further detailed Meridian Water master planning work will identify more specific locations for land uses.</p>
Policy EL3 Para 5.5.1 – 5.5.8	IKEA PI Ltd	16	Unsound	IKEA does not object to the promotion of a local centre in the vicinity of the store however redevelopment could only occur if appropriate parking and access provisions were satisfactorily protected for the store.	Further work will be required during detailed master planning on phases and development proposals to ensure access and parking for the town centre uses meet

				<p>Careful consideration needed regarding the road layout of the Causeway and impact on IKEA's operation</p> <p>The market will influence the relative size of each unit and element of flexibility over the width of shop frontages would be more realistic</p> <p>The alignment of the Causeway and specific siting/mix of uses will be the subject of outline applications</p> <p>Suggest sentence to be included at the end of Policy EL3 to Read:</p> <p><u>The development of Meridian Water Town Centre must not jeopardise the existing operations of businesses in Meridian Water, including their access, servicing arrangements and parking provision</u></p>	<p>the needs of existing operators and planned new uses.</p> <p>The ELAAP encourages a diverse mix of shops through the restriction on length of frontage. Double frontage allows some flexibility, so long as they are separated by a minimum of two single frontages.</p> <p>The Council will seek further discussion with IKEA on the wording of Policy EL3 in relation to existing retail operators.</p>
Policy EL3	Christian Action Housing Association	13	Not stated	<p>Welcome the commitment to the new town centre delivering on-site affordable floor space provision for small and independent shops subject to viability. There will need to be a balance between the "normal suspects" in terms of retail space and the introduction of a variety that will enable a unique character to be developed at Meridian Water. This will include amenity uses such as restaurants and cafes of which we hope at least some will be independent from national chains.</p>	<p>Policy EL3 restricts shops frontage width to help support a mixed and variety town centre offer. Developing a café and restaurant culture in the area is also promoted by this policy.</p>
Policy EL3	GL Hearn on behalf of Tesco Stores Ltd	14	Not stated	<p>Welcome the commitment to creating a new town centre as part of the Meridian Water Opportunity Area. However the emerging Enfield Development Plan does not seek formal adoption of Meridian Water as a designated centre. Given the important retail function of Meridian Water we contend that the emerging Enfield Development Plan should include the designation of Meridian Water (including the existing Tesco Extra) as a retail centre.</p>	<p>The exact form and location of the Meridian Water town centre will be determined through further detailed masterplan phasing work, designation at this stage would be premature. The existing retail at Meridian Water (Tesco, Ikea and Ravenside Retail Park) is not included as part of the new centre floorspace as the Council wishes to develop a diverse centre which consists</p>

				<p>Policy EL3 suggests that shop frontage within the proposed town centre should not be more than 6-8 metres in width. In this regard whilst Tesco supports the Council’s vision to create a ‘high street’, providing a variety of retail uses to create a vibrant and diverse centre, concerned that this objective is not consistent in meeting retail need in full. Indeed, there is demand for the continued provision of large format retail stores within the Meridian Water Opportunity Area. Our client would therefore welcome the opportunity to work proactively with the Council in preparing options of the redevelopment of the site to meeting the Council’s objectives whilst ensuring retail needs continue to be met.</p> <p>While Tesco welcomes the objectives of Policy EL3 of the ELAAP in that they seek to enhance the retail offer within the Opportunity Area, with a new town centre to be located along the proposed Causeway, Tesco would like to work with the Council in relation to the character of the proposed town centre.</p>	<p>of smaller, mixed units. Limiting the shopfront width is one method to achieving this outcome, which would be undermined if a disproportionate quantum of new floorspace at Meridian Water were to be absorbed within a single large retail store.</p> <p>The Council will work with Tesco to incorporate the store site as an important and positive contribution to the Causeway route and this area of Meridian Water.</p>
Policy EL3	Barratt Homes	15	Not stated	<p>Support the designation of a new town centre at Meridian Water. The London Plan defines a District Centre as one with c.10,000m² - 50,000m² of floorspace (and a local centre with 500m²). Given the existing retail floorspace on site (Tesco and IKEA) the new centre will fall within the District Centre definition and should be defined as such.</p> <p>The policy states that where proposals comprise greater than 2,000m² (taking into account existing and extant planning permissions) the applicant must demonstrate evidence that there would be no adverse effect on neighbouring centres and that the proposal is in proportion to the growth in local demand. The “cumulative test” of existing and extant planning permissions doesn’t define a specific search area, and therefore it might be more appropriate to have a fixed threshold. In addition “growth in local demand” is not a NPPF compliant term and is not effective. Restricting retail development to only meeting “growth” in retail expenditure is unduly restrictive and should be deleted. This</p>	<p>The existing ‘large box’ retail units are not classified within a town centre designation. Including these units would negatively affect the ability to promote a diverse and vibrant new town centre at Meridian Water.</p> <p>The Council will seek further discussions on the Policy EL3 text to ensure clarity in terms of cumulative provision restrictions, and that growth in retail space must be proportionate to the growth in local demand.</p>

				approach would preclude retail proposals meeting existing shortfalls, or capturing expenditure that is leaking out of the catchment. Retail jobs are considered a fundamental component of Meridian Water at present (1,100 of the current 2,600 Meridian Water employees) and for the future growth in jobs. Paragraph 5.4.10 confirms that Retail (A use class) jobs will comprise 6% of the 6,000 proposed. These jobs could be compromised with a “growth only” retail policy.	
Policy EL3	Canal & River Trust	18	Not stated	Active frontages should support natural surveillance of the waterway corridor. They will, however, need to be carefully managed to avoid adverse impacts, such as uses spilling out onto the towpath.	Potentially adverse impact of waterside uses can be controlled through the use of planning conditions.
Policy EL3	Environment Agency	23	Not stated	This policy should be read in conjunction with policy EL12 and ensure that there is a minimum of 8m set back from development to the top of the river bank.	The Council will seek further discussion with the EA on inclusion of minimum set-back distances.
Policy EL4	Canal & River Trust	18	Not stated	The Ravenside Retail Park site will continue to represent a significant length of the canalside frontage within the Meridian Water development. Suggest that the vision for the site would be clearer if policy EL4 made it clear that improvements to the site’s interaction with the River Lee Navigation corridor is a specific focus for this. We note that any development of the site would need to comply with policies EL10, EL12 and EL27 in any event.	Within the Plan Ravenside Retail Park will continue in its existing use. Policy EL4 seeks to improve the public realm and linkages with other parts of Meridian Water. As per the comment, policies EL10, EL12 and EL27 support improvements to the interface between the retail park and waterway.
Policy EL4	GLA	27	Not stated	The proposals for the redevelopment and reconfiguration of the retail units at Ravenside Retail Park as discussed in Policy EL4 are supported. However, in line with the NPPF and London Plan Policy 4.7, this should not lead to an intensification of retail floorspace without application of sequential and impact assessments. It is therefore recommended that Policy EL4 makes this clear.	The Council will seek further discussion with the GLA regarding reference to sequential and impact assessments.
Policy EL5	Sport England	12	Not stated	Sport England advises that schools are designed with community use in mind as facilities would be of benefit to the community and also maximise the use of land. Community use of schools should be	Policy EL5 requires community facilities, including schools, to support co-location and multi-functional uses. Since there is

				<p>secured by a Community Use Agreement (CUA) therefore Sport England strongly advise that the requirement for new (and existing) schools to have a CUA is written into the policy. In terms of the location of school playing fields and sports facilities, the APP states that these should be within 400m of the school. Sport England has concerns with this approach and would question how accessible this would be to all users of sports facilities and how well these facilities would function if the ancillary facilities, such as changing rooms, are a considerable distance from where sport would be played.</p>	<p>more than one method of achieving this outcome, a particular approach is not specified. The Council will seek further discussion with Sport England on this issue.</p> <p>The potential to allow up to 400m between the school and outdoor sports pitches is to recognise that, with limited space available at Meridian Water, the best provision of outdoor sports facilities may be on a separate site, albeit one within a short walking distance.</p>
Policy EL5	Christian Action Housing Association	13	Not stated	<p>Other Infrastructure and Service Issues - Meridian Water will need investment and careful phasing of other facilities, most notably in the provision of education and health services. Urge that consideration of these is central to the phasing of the construction of new housing and that in particular new schools and additional school places are phased early enough in order to meet growing local needs as the population expands.</p>	<p>Policy EL5 on community facilities requires that growth of new residential areas ensures provision of sufficient education facilities at Meridian Water.</p>
Policy EL5 Para 5.7.1 – 5.7.6	IKEA PI Ltd	16	Unsound	<p>AAP seeks to deliver a range of community facilities to be easily accessible. If not privately funded, it will be important to ensure this infrastructure which seeks to provide benefits to the area will be delivered by CIL.</p> <p>A better understanding of the relationship between CIL and proposed Section 106 obligations is required to ensure that it does not affect viability and hinder regeneration of this area</p> <p>It is considered that Policy EL5 should identify the mechanism for delivery</p> <p>It will also be important to ensure funding and delivery of infrastructure/community facilities is spread across the complete Masterplan area</p>	<p>CIL expenditure is defined by the Regulation 123 list, which does not include the community facilities described by Policy EL5.</p> <p>Infrastructure and the S106 approach are set out in Policy EL13.</p> <p>The Council will seek further discussion with IKEA on these matters relating to funding and delivery of infrastructure.</p>

				There will also need to be an equalisation of values to enable public spaces and community facilities which are required to enable the regeneration to be delivered	
Section 5.7, Policy EL5	North Middx Hospital – NHS Trust	21	Not stated	<p>Concerned that there is no consideration of the potential impact on local secondary health care and mental health care provision from the increase in population.</p> <p>While consideration and approval are given for this regeneration scheme, further work is carried out to scope the increased demand placed on local secondary health care and mental health care to ensure that provision is increased in a timely and appropriate way to ensure the health and well-being of the current and future population.</p> <p>Regarding plans for the new primary health care centre, understand these are to be re-appraised and the Trust will be involved in this process which is a welcome development.</p>	<p>The Council will consult further with the North Middlesex Hospital Trust to ensure the scheduled population increase at Meridian Water are included in the secondary health and mental health care plans.</p> <p>The requirement for a new primary health centre at Meridian Water is set out in Policy EL5.</p>
Section 5.7.8	Environment Agency	23	Not stated	Should recognise the potential contribution of improved open spaces and green and blue networks for encouraging healthy lifestyles. E.g. the River Restoration project in Mayesbrook in Dagenham ecosystem services assessment showed that the additional benefits to health and wellbeing and economic are substantial and we recommend this as a point of reference in developing this section further.	<p>Update text at paragraph 5.7.8:</p> <p><i>‘Existing health inequalities will also be addressed by increasing access to education and employment opportunities.</i></p> <p><u>Improved open spaces and green and blue networks can also encourage healthy lifestyles.</u></p>
Section 5.7 and Policy EL5	Education and Skills Funding Agency	25	Not stated	<p>It would be helpful if key national policies relating to the provision of new school places were explicitly referenced within the document. In particular:</p> <p>- The NPPF (para 72) advises that local planning authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet</p>	While NPPF requirements for education provision will be fully considered as necessary for development proposals, the

				<p>the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education.</p> <p>- The ESFA supports the principle of London Borough of Enfield safeguarding land for the provision of new schools to meet government planning policy objectives as set out in the NPPF (para 72). When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary.</p> <p>- London Borough of Enfield should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on 'Planning for Schools Development' (2011) which sets out the Government's commitment to support the development of state-funded schools and their delivery through the planning system.</p>	<p>AAP seeks to avoid duplicating policy wording.</p> <p>Any requirement for a new school to safeguard land for potential expansion should be considered at the point of detailed proposals, whether through an application or masterplan.</p> <p>Comment noted.</p>
Section 5.7	Education and Skills Funding Agency	25	Not stated	<p>The ESFA encourages close working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places. In line with the Duty to Cooperate, please add the ESFA to your list of relevant organisations with which you engage in preparation of the plan</p> <p>The ESFA commends, for example, the approach taken by the London Borough of Ealing in producing a Planning for Schools Development Plan Document (DPD). The DPD includes site allocations as well as policies to safeguard the sites and assist implementation.</p>	<p>The ESFA is included on the Council's consultation list for Local Plan documents.</p> <p>The Council will consider its approach to site allocations for schools as part of the emerging Local Plan process.</p>
Policy EL5	Education and Skills Funding Agency	25	Not stated	<p>Arising from the potential land constraints of the wider site, off-site playing fields may be necessary (as set out within the policy). The specification that playing fields should be provided within 400m of a school and should be safely accessible is noted and welcomed. However, this should not act to prohibit school delivery where this distance cannot be met. Linked to this, the wider emphasis</p>	<p>Provision and access to outdoor sports pitches is important to ensuring secondary schools have appropriate facilities. Policy EL5 establishes a maximum distance so that the facilities are within walking distance for the students.</p>

				throughout the document (including within Policy EL7) on improving accessibility, public transport and footpath/cycle links is also supported. This is reflected in the policy that requires schools to be accessible to pupils and to consider the traffic flows/impacts of surrounding uses. This is also reinforced by the area wide policies such as Policy EL21, which seeks to improve the pedestrian and cycle routes in order to encourage greater walking/cycling and reduce car use. Other policies also relate to improved bus routes (EL23) and use of waterways for transportation (EL24).	Enabling safe connectivity around Meridian Water and the wider area through the use of active modes and public transport is vital for sustainable school access.
Polices EL5 and EL13	Education and Skills Funding Agency	25	Not stated	Need to ensure that education contributions made by developers are sufficient to cover the increase in demand for school places that are likely to be generated by major developments. The ESFA note that in terms of delivery of the required schools, Policy EL5 cites both CIL and S106 contributions as potential sources of funding. Policy EL13 (Infrastructure Delivery in Meridian Water) provides further clarity, with this approach being supported by the ESFA. 15. The ESFA would be particularly interested in responding to any review of infrastructure requirements, which will inform any CIL review and/or amendments to the Regulation 123 list. As such, please add the ESFA to the database for future CIL consultations.	The ESFA is included on the Council's consultation list and will be contacted for any review of the CIL or S106 documents or approaches.
Policy EL6 Paras 5.8.1 to 5.8.10 Figure 5.1	LaSalle Investment Management and Aytans MFG Co UK Limited. (Turley)	10	Unsound	The proposed alignment of the east-west 'Causeway' route east of the River Lee Navigation has not been considered against an assessment of alternatives, is prejudicial to delivery of SIL uses, is not justified or effective and is therefore unsound. The sections of the Causeway now located on the east side of the River Lee Navigation are inconsistent with and different to those alignments published in all the Council's previous documents. No comparison or assessment of the merits of the proposed safeguarded route with earlier options – or other potential alignment options – is made in the ELAAP document.	The reasons underlying the Causeway alignment are set out in paragraphs 5.8.5 to 5.8.10 of the ELAAP. Attaining an optimal alignment for the Causeway is vital to enabling access through Meridian Water. The AAP establishes the route which is critical to protecting the land use to enable regeneration. The route has been developed to balance the requirements for its variety of roles including as a transport corridor,

				<p>Similarly, there is no testing of alternatives in the Sustainability Appraisal undertaken by AECOM (March 2017) or the document prepared by (KCA) titled 'Edmonton Leaside Area Action Plan 'Spatial Framework', February 2017, published as an evidence base document. As such, the Sustainability Appraisal is considered to be legally flawed and not fit for purposes. The requirement in law for the ELAAP to be the subject of sustainability appraisal has not been fulfilled.</p> <p>Page 11 of the KCA 'Scenario Testing' document states that "Releasing Strategic Industrial Land is essential to enable the critical east-west connection across the site and the access to the Lea Valley Regional Park". This is not correct and is not reflected by the Development Plan documents, Meridian Water Masterplan or other guidance referred to above.</p>	<p>community space, and location for retail. This AAP will establish a primary east-west route for the Causeway, with further technical and detailed site investigation work refining the alignment.</p> <p>While the release of SIL will allow the full potential of the Causeway to be realised, it is accepted that the route could be achieved without SIL release.</p>
Policy EL6	Canal & River Trust	18	Not stated	<p>The proposed Causeway will cross the Canal & River Trust's property and an agreement will therefore be needed with us prior to its development. We welcome policy EL6's recognition of the need to work with partners and stakeholders.</p> <p>Whilst we have no objection to the safeguarding of a 16m corridor across the River Lee Navigation to deliver the bridge, we would suggest that the aspiration should be to deliver as narrow a structure as possible to minimise its impact on the Blue Ribbon Network. The spaces alongside bridges need to be carefully designed to ensure that they offer natural surveillance, as well as a good quality connection to the towpath for pedestrians and cyclists. Whilst it could be argued that this point is covered by policy EL10 and EL12, we suggest that this change would help to identify the area around the Causeway bridge as a particularly sensitive location.</p>	<p>Comment noted.</p> <p>The bridge design must be sufficient to carry the traffic requirements – further detailed assessment and design work will be carried out.</p> <p>The Council will seek further discussion with C&RT on the wording in policies EL10 and EL12 with regard to connectivity design aspects around the Causeway/ River Lee Navigation intersection.</p>
Policy EL6	GL Hearn on behalf of Tesco Stores Ltd	14	Not stated	<p>Tesco supports the implementation of the Causeway to maximise connectivity across the Meridian Water Opportunity Area. The Causeway will start at the junction of the existing Glover Drive with the alignment of Glover Drive retained to serve the existing Tesco and Ikea stores, ensuring that the existing Tesco Extra can remain</p>	<p>The Council will seek to discuss delivery of the Causeway with stakeholders, including landowners.</p>

				operational. Will work with the Council on how the site can be delivered to ensure a high quality design and density.	
Policy EL6: 5.8.1 – 5.8.7	IKEA PI Ltd	16	Unsound	<p>Route is very prescriptive but insufficient work has been undertaken to demonstrate it will serve existing operators and proposed development</p> <p>Further detail is required as to the reconfiguration of Glover Drive and the layout of the highway in respect of Segment 1 of the Causeway (Section 5.8.7).</p> <p>It is imperative that the reconfiguration to accommodate cycle lanes, pavements and landscaping does not have an impact on the current operations of IKEA No references to the need to serve and protect existing operators. Policy should highlight that all proposals will need to demonstrate how they are compatible with existing neighbouring uses and will not impact upon their operation</p> <p>Need to consider impact on both vehicular access arrangements and safe pedestrian access for customers and staff</p> <p>Insufficient assessment or explanation of whether the Causeway will have the capacity to accommodate the new homes and jobs proposed in addition to the existing traffic on the highway network. There is currently a lack of technical modelling information presented to demonstrate the deliverability of the proposals</p> <p>Essential that junction capacity assessments, including detailed junction designs and predicted traffic generation flows for the proposed development are undertaken before the AAP is adopted. This is necessary to provide more confidence with regard to the validity of the transport strategy within the Meridian Water Masterplan.</p>	<p>The AAP safeguards the Causeway route to ensure the land is protected from other forms of development. Further work will be required during detailed site investigation; phased master planning; and development proposals to ensure the layout, configuration and capacity meets the needs of existing operators and planned new uses. The planning work will also need to consider the safe interaction of pedestrians, cyclists and motor vehicles.</p> <p>Detailed road network and junction designs, along with capacity assessments, will be carried out as development proposals and detailed masterplans are brought forward. The AAP is a higher-level document and it would be premature to establish such specific network plans and evidence at this stage.</p> <p>The route has been established by the parameter set out in paragraphs 5.8.5 to 5.8.10.</p>

			<p>Greater flexibility required including consideration of alternative routes</p> <p>Emphasis is placed on the provision of public spaces and public realm without sufficient consideration of the relationship with and impact on existing operators or deliverability. IKEA has a unique format and configuration. The relationship between car parking and the store's entrance is essential, particularly having regard to the nature of the products, customer movements etc. Links to the store would be affected as direct access from the North Circular Road via Argon Road would be impacted, potentially forcing visitors to the store to navigate a series of junctions along Montagu Road and Conduit Lane</p> <p>Imperative that the main vehicular accesses to the store are retained to prevent this from prejudicing the continued successful operation of the store and to ensure that the entrance is identified clearly from the road and from the car park access</p> <p>Great emphasis is placed on prioritisation for pedestrians. IKEA requires assurances of how the road network will operate and how it will serve their operation which requires customers to pass the front of the store before entering the site, with a clear orientation of where the entrance is. IKEA acknowledge that the Meridian Water Masterplan indicatively shows how this may work but there is not enough detail</p> <p>IKEA are very keen to work with the authority and welcome confirmation the authority intend to undertake further modelling and are happy to meet. However it is considered that the proposed arrangement currently prejudice IKEA's operation.</p> <p>Consider that the following bullet points of Policy EL6 Part A are amended to read:</p> <p><u>- support the delivery of a continuous link route</u></p>	<p>The Council will seek further discussions with IKEA to consider how the ELAAP addresses issues including car parking, access and store aspect.</p> <p>The Council will seek further discussion with IKEA on the proposed wording.</p>
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Policy EL6	TfL	27	Not stated	Recommend the policy should specify that as per 5.8.3 that the Causeway should prioritise Public Transport.	The Council will seek further discussion with TfL on wording in Policy EL6 referring to the prioritisation of public transport.
Section 5.8	LaSalle Investment Management and Aytans MFG Co UK Limited. (Turley)	10	Unsound	<p>The intended role of the east-west route in the ELAAP as a ‘destination’, (supporting retail, leisure, community and cultural uses) is unrealistic, unsuitable within a SIL and further prejudicial to delivery of SIL uses.</p> <p>The de-designation of the SIL there should not be assumed. In any event, the land benefits from outline planning permission for B1c/B2/B8 uses and it is the intention of the owners to secure the implementation of that permission. Retail, leisure, community and cultural uses are not included in the permission – and are generally not permitted within SIL.</p> <p>No recognition is given in the ELAAP to the outline permission and this is a significant shortfall of the strategy and reasoning for both the proposed de-designation of the Stonehill Estate as SIL – and the ‘dual role’ of the Causeway route.</p>	<p>The Causeway will be a vital link running through Meridian Water and will fulfil multiple roles that provide for retail, community and transport. The AAP seeks the removal of SIL designation which will also remove the restrictions on non-industrial use activities.</p> <p>It is not a requirement for the ELAAP to reference planning permissions within the plan area, including the outline permission at Stonehill granted at appeal in 2015.</p>

			<p>Segment 3 Appraisal</p> <p>Paragraph 5.8.9 of the ELAAP document describes Segment 3 and explains that it maintains the alignment of Segment 2 from the west side of the canal. No explanation is given why this is necessary or justified.</p> <p>It is stated that the alignment is also informed by public transport requirements “to introduction [sic] an effective bus service requires that pedestrian access to the bus stops is located a maximum of 200 metres from any residence. However, there is no certainty that there will be residential uses within the Stonehill Estate or wider SIL to which the 200 metre figure relates. Indeed, the 200 metre figure is much shorter than used elsewhere in the ELAAP and Sustainability Appraisal. Policy EL23 references that major new developments have good access - of no more than 640m from the development - to a bus stop. The 640 metre figure is from the TfL document ‘Assessing Transport Connectivity in London’, April 2015</p> <p>Segment 3 is also located on top of existing buildings which the Council does not own or control (and so it cannot deliver this segment alignment) and ignores existing access routes. Segment 3 runs diagonally between Silvermere Drive (to the north) and Anthony Way to the south. This approach runs counter to the MWM objective that the east-west route should give consideration to existing infrastructure, and have least possible impact on existing employment facilities. The alignment also creates irregular building plots which will compromise the optimisation of the development that can be achieved either side of the route under the outline permission and through regeneration generally.</p> <p>Segment 3 of the Causeway route in the ELAAP is not justified or effective and its present alignment could undermine the delivery of the outline planning permission on the land. To avoid this, (and mitigate the impact on optimal development layout for SIL uses) it is suggested that the alignment of Segment 3 be altered to run parallel</p>	<p>The AAP provides for mixed uses on the east bank of the River Lee Navigation, which is aligned with the position following removal of the SIL designation. Development of residential uses will require good access to public transport, to which bus services play an important consideration. Shorter distances to bus stops in a high-density location will be a key benefit.</p> <p>The Meridian Water Masterplan (2013) has been superseded, and the Council is now seeking comprehensive redevelopment at Meridian Water to the east of the River Lee Navigation.</p> <p>The alignment of Section 3 is justified for the reasons set out in the AAP.</p>
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			<p>with Silvermere Drive and Anthony Way. If the alignment were to connect with the Angel Bridge crossing point shown as part of Segment 2 on Figure 5.1 the alignment for Segment 3 would sit just north of Anthony Way. This alignment would not unduly prejudice accessibility of occupiers of new uses developed in this area to new bus stops on the route.</p> <p>Segment 4 Appraisal Paragraph 5.8.10 in the ELAAP states that Segment 4 responds the specific constraint of a water tunnel approximately 10 metres underground. To limit building costs over this tunnel the Causeway adopts the alignment of the tunnel. However, existing buildings have been developed over its route and, accordingly, it is not the major constraint to development and buildings being constructed over it that the ELAAP suggests.</p> <p>Advanced discussions have taken place between LaSalle Investment Management’s structural engineer and Thames Water engineers regarding the redevelopment of a site known as the Triangle site west of Harbet Road and east of Rivermead Road (within the Stonehill Estate). The construction of the tunnel is such that it needs compression/loading from soils either side and from above to ensure its structural integrity. Other than consideration and engagement with Thames Water regarding foundation design and the method for addressing loading/unloading on the tunnel during construction, the spine tunnel is not regarded as a particular constraint to new buildings build erected above it and along its route. For this reason the ‘very specific constraint’ identified at paragraph 5.8.10 to justify the position of Segment 4 is not a fundamental constraint.</p> <p>The alterations required to the ELAAP which should be made are:</p>	<p>The requirement for a specific engineering solution indicates that the water tunnel does present an obstacle to development. This will be subject to further site investigation. The proposed development at the Triangle Site (which has now received permission) constitutes low-rise industrial units. ELAAP establishes a framework for a far greater density of development.</p> <p>ELAAP removes the SIL designation, which will allow non-SIL uses to be permitted along the full length of the Causeway.</p>
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				<p>Re-wording of explanatory text at paragraphs 5.8.1 to reflect the functional role of a central east-west route as a strategic east-west link supporting development (in the same way as for Core Policy 37 and 38), as a focus for public transport, pedestrian and cycle movement and activity, but removing references to non-SIL uses creating this activity.</p> <p>Figure 5.1 to be amended to show the route as illustrative/indicative (i.e. not rigid/safeguarded) with widths deleted. An alignment located to the south of the Stonehill Estate boundary is suggested, running parallel to and just north of Anthony Way. The detailed descriptions at paragraphs 5.8.7 to 5.8.10 seeking to justify the alignments of Segments 1-4 should also be deleted.</p> <p>Policy EL6 includes a significant number of requirements and criteria which will be onerous and prejudicial to the delivery of SIL uses and/or the uses permitted by the outline permission if the east-west route were to run through or immediately adjacent to the Stonehill Estate. The policy requires significant simplification. The opportunity to discuss these changes with officers at the Council would be welcomed.</p>	<p>For the reasons described above, Figure 5.1 and Policy EL6 should not be subject to the changes suggested by the respondent.</p>
Section 5.8.8 Segment 2	Environment Agency	23	Not stated	<p>Recommend early engagement with EA for the proposed bridges as there are fixed requirements which may affect the design of these crossings. This includes a requirement for an Environmental Permit and details on (but not necessarily limited to) soffit heights, abutment location/design and bridge span.</p>	<p>Agree that EA must be involved early in bridging proposals to ensure that fixed EA design requirements are met.</p>
Policy EL7	Christian Action Housing Association	13	Not stated	<p>Support the emphasis placed on improved rail services, bus interchange and public transport in general, together with the encouragement of cycling and walking as alternatives to car use. The level of development and the creation of a new neighbourhood at Meridian Water provides an opportunity to achieve a higher level of sustainability than is often found in more traditional areas of housing.</p>	<p>Achieving a modal shift towards active travel and public transport use is a key aim of the ELAAP and the regeneration at Meridian Water.</p>

				If the new neighbourhood, from day one, has a high degree of rail and bus accessibility this will discourage the use of cars and will encourage user habits that are less reliant on the motor vehicle.	
Policy EL7	GL Hearn on behalf of Tesco Stores Ltd	14	Not stated	Welcome the Council's ongoing commitment to the delivery of Cross Rail 2 and the new Meridian Water Railway Station. Would like clarification regarding the delivery of Cross Rail 2, and the implications on the delivery of the mixed use redevelopment of the existing Tesco Extra at 1 Glover Drive and would welcome the opportunity to engage further with the Council and TfL.	The accessibility of the 1 Glover Drive site to the new Meridian Water station would make this suitable for higher density, mixed use development, subject to appropriate design. Progress on Crossrail 2 is subject to the Government finalising commitment. The Council will engage with Tesco to consider potential options for regeneration of this site.
Policy EL7	TfL	27	Not stated	Should refer to bus standing as well as interchange.	Update text at Policy EL7, 3 rd bullet: <i>'Improved bus interchange and bus standing connecting Meridian Water to...'</i>
Para 5.8.17	TfL	27	Not stated	Should refer to bus standing. Good to see a strong approach to discouraging car parking.	Update paragraph 5.8.17: <i>'A new bus interchange and associated bus standing will be provided, creating a transport hub and connecting bus services to the station.'</i>
Section 5.9, Policy EL8, Section 5.10, Policy EL9	Thames Water	07	Not stated	Thames Water do not object to the policy in principle, but consider that it needs to be improved in relation to their landholdings and infrastructure constraints. Meridian Water - Thames Water own land at Harbet Road (to the south of the North Circular) which is located within the Meridian Water area. Major underground infrastructure runs through this area which has the potential to significantly constrain the future	Proposals coming forward at Harbet Road will be subject to full consultation with all relevant bodies, including Thames Water. The Causeway route has been specifically

			<p>use of this land. The draft proposals set out in the draft AAP would need to be considered carefully, for example Thames Water would not be able to accommodate some of the proposals close to their existing underground infrastructure.</p> <p>Thames Water Land to the South of William Girling Reservoir - Whilst the consultation document does not specifically refer to the Thames Water owned land to the South of William Girling Reservoir as a flood storage proposal, reference is made to potential upstream flood storage, and the related background technical documents make clear that the site is an identified location for this use. Thames Water's strategic land assets can only be released for other uses should it be proven that they are not required either now or in the foreseeable future for Thames Water's operational use.</p> <p>Banbury Reservoir - The policy does not mention that Banbury Reservoir is an operational reservoir owned and operated by Thames Water for public water supply. Thames Water agree that there is an opportunity for improved access into Banbury Reservoir such as reviewing the potential for pedestrian access around the reservoir embankment; depending on arrangements for the management of health and safety obligations. Any access to the reservoir will need to ensure that the structural integrity of the reservoir and the operational function of the reservoir are not compromised. A watersports centre is potentially feasible, subject to understanding the detailed proposals. However, we could not permit a floating clubhouse for operational reasons due to the fluctuating levels in the reservoir and the need for periodic drain downs. Any clubhouse would need to be located away from the reservoir embankments.</p> <p><u>Proposed Change</u> Reference needs to be made in Policy EL8 and EL9 and supporting text to the constraints identified above on Thames Water land.</p>	<p>aligned to respond to the presence of a water tunnel 10m underground.</p> <p>Upstream flood storage may be an important component in protecting Meridian Water from flood risk. Any land identified for flood storage would be subject to full consultation with the land owner.</p> <p>The Council will seek discussions with Thames Water over concerns on wording relating to land ownership and operational use, including of Banbury Reservoir, Harbet Road and to the South of William Girling Reservoir.</p>
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				Reference should also be made to the need to work with Thames Water to agree a way forward for proposals involving Banbury Reservoir and Thames Water land at Harbet Road and to the south of William Girling Reservoir.	
Section 5.9 and Policy EL8	Environment Agency	23	Not stated	<p>The area covered by the plan is complex in terms of flooding as there are several watercourses and interactions between fluvial and surface water flood risk. The modelling used in your Level 1 and 2 Strategic Flood Risk Assessments has now been superseded. EA are currently in the process of reviewing the modelling in this area to incorporate the new allowances for climate change, though we do not anticipate this will be completed in 2017.</p> <p>The high level sequential test undertaken by Enfield demonstrates that development is necessary within Ponders End and Meridian Water in order to meet Enfield's strategic objectives. However, section 3.6 of the Level 2 SFRA notes that a further sequential test will still need to be applied within the priority regeneration area boundary in order to steer development to areas of lowest flood risk and this is further reiterated within the recommendations (section 3.69 and 4.67). The requirement for a sequential test to be undertaken must therefore be included within the policy.</p> <p>The AAP must be supported by an up to date evidence base for flood risk and include an assessment for climate change. The AAP includes a significant level of growth unsupported by an up to date evidence base. As such the Sustainability Appraisal concludes that the plan has uncertain effects in respect of flood risk.</p> <p>Table 4.1 of the Sustainability Appraisal includes an objective for the plan to meet the challenge of climate change and ensure that new development is prepared for the impacts of climate change. Additionally, your Sustainability Appraisal scoping report notes that climate change is expected to increase the likelihood of flooding events in the future, and it is important that developments within the AAP, in particular the Meridian Water proposals, are compliant with flood risk guidance.</p>	<p>Note that the EA modelling based on the new allowances is now due for 2019.</p> <p>The Sequential Test will be applied within the site, steering development towards areas of low flood risk, but where this is not possible, the LPA in consultation with the EA will need to be satisfied that the Exception Test can be passed.</p>

				<p>We strongly recommend that the Level 2 SFRA is updated and an overarching flood risk assessment and strategy is developed for Meridian Water in particular, as this will help in determining whether there are any sites which may be suitable for offsite flood storage. 10.9.8 notes that the Level 2 SFRA has informed the masterplanning and design work to date, however this evidence is now four years old and there have been significant changes most notably the flood risk modelling and climate change allowances. It essential that the Meridian Water area overall is supported by an up-date evidence base. We welcome the opportunity to meet with you to discuss this matter with you further as you will also need to have an up to date evidence base for your forthcoming local plan.</p>	<p>The Council is currently updating the Level 1 SFRA and will update the Level 2 SFRA for Meridian Water afterwards (this is unlikely to be before 2019 as this is not possible until the new EA model is released).</p>
Policy EL8	Canal & River Trust	18	Not stated	<p>Welcome recognition of the need to work with C&RT to secure an integrated and sustainable approach to the management of development and flood risk. This should be considered alongside the design of new development to try to avoid conflict between different planning priorities.</p> <p>Subject to flood risk management, other safeguards to protect water quality and an agreement with the Trust, there may be opportunities for developments to drain surface water into the River Lee Navigation. We suggest that this could be recognised in the plan.</p>	<p>The Council will engage with stakeholders such as the C&RT to manage flood risk. The Council will seek further discussion with C&RT on the wording in Policy EL8 and the potential for surface water drainage into the River Lee Navigation.</p>
Policy EL8	Environment Agency	23	Not stated	<p>The requirement for the sequential test to be applied to individual development sites has still not been included within the policy, although we note the reference to the test in paragraph 13.4.1. Although this policy covers the minimum requirements (with the exception of the sequential test) it lacks the detail of the previous policy wording and the local specificity. As AAPs are intended to set out what developers are expected to do within a defined area it is surprising that this level of detail has been removed, unless this will be included in the New Local Plan for all developments.</p>	<p>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" – as such the Council considers that Policy EL8 is sound.</p>

				<p>The last paragraph of the policy should be expanded on and clarified. The policy needs to be specific about the types of infrastructure which contributions will be sought for through planning obligations. It may not be appropriate to secure all flood risk mitigation through this route and any mitigation will have to be delivered on site as part of the development. For example, when floodplain compensation is required prior to a development being built. This policy should also consider how flood risk will be assessed and managed for meanwhile uses.</p>	<p>The Council would like to clarify with the EA what flood risk management infrastructure improvements in Lee Valley may be required and how they will seek funding contributions.</p>
Section 5.9.5 and 5.9.6	Environment Agency	23	Not stated	<p>Amend wording of section 5.9.5 - the climate change allowances have now been changed and are available on our website https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances.</p> <p>Clarify the text to explain what is meant by flood mitigation requirements creating competition below ground. Does this relate to the restriction of certain uses depending on their vulnerability or because it is planned to store flood water underground?</p>	<p>Update wording at paragraph 5.9.5: <i>'The Environment Agency has is updateding its requirements for climate change allowances to a higher level than those used to prepare the Level 2 SFRA and the Environment Agency's own fluvial modelling.</i></p> <p>Update text at paragraph 5.9.6: <i>'Flood mitigation requirements will create considerable competition for space across Meridian Water, both above and below ground, and must therefore be fully integrated at an early stage within the detailed design of streets, buildings and spaces.</i></p>
Para. 5.9.8	Environment Agency	23	Not stated	<p>It should be recognised that restoration of watercourses is required for both flood mitigation and biodiversity enhancement. The illustrative image on this page shows very hard landscaping for the Lee Navigation. The vision should include greening of the river edge in line with the WFD actions and Enfield Biodiversity Action Plan.</p>	<p>Policies EL12 and EL27 address watercourses and requires that proposals protect and enhance habitats and biodiversity, including naturalisation/softening of river channel edges. The image on page 68 is illustrative only.</p>

Section 5.10	Environment Agency	23	Not stated	The map on this page should include rivers to show that rivers are part of the green infrastructure.	Figure 5.3 map does show watercourse, albeit not marked on the key. It should also be noted that this image is illustrative only.
Policy EL9	Sport England	12	Not stated	<p>It should be clear in any policy option that new sports facilities should be provided where there is a clear, robust and up-to-date evidence for it, such as a Playing Pitch Strategy (which the Council are currently in process of developing) or a Built Facility Strategy, and not merely when it is “appropriate” as stated in Policy EL9. In addition, these strategies would be able to inform the strategic direction of the AAP policies relating to sport facilities and playing pitches to ensure positive planning for sport, including directing which facilities need protecting and enhancing. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields</p> <p>Open spaces are key providers of playing pitches and also are important for informal participation in sport. In this regard, revitalising open spaces at Picketts Lock, as expressed in Policy EL20, should not result in the loss of playing pitches or playing field land unless the Playing Pitch Strategy clearly identifies this area is surplus for sport. Sport England would object to any loss of playing field or playing field unless such a surplus is identified as it would not be in accordance with the NPPF and Sport England’s playing field policy.</p>	<p>Amend Policy EL9 6th bullet point as follows:</p> <ul style="list-style-type: none"> • Where appropriate there is evidence of need, the provision of formal playing fields; <p>More detailed plans and specific planning proposals at Picketts Lock will be assessed against the policy framework. Sport England’s objection to the loss of any playing field at this location is noted, and the organisation would be consulted in the event of proposals coming forward.</p>
Policy EL9	Christian Action Housing Association	13	Not stated	Public Open Space & Recreational Areas - clearly an opportunity to create a high quality external environment for residents and visitors to Meridian Water and also some of the surrounding areas within Edmonton Leaside. The illustrations in the proposed submission indicate a high level of aspiration for this and we hope that this will be achieved as development proceeds.	Improving the quality of, and access to green spaces, the network of waterways and leisure facilities is vital to the successful development of the area. This aim is support by numerous policies in the AAP.
Policy EL9	Canal & River Trust	18	Not stated	Welcome the recognition in policy EL9 that Meridian Water has the potential to deliver a significant leisure offering, including for example... facilities for boating.	Comment noted.

				<p>Disappointing that the AAP no longer offers (appropriately qualified) support for the inclusion of new waterspaces within Meridian Water or the land adjacent, as this appeared to be a key part of the character of the previous development proposals. Policy EL9 supports, “where appropriate”, new wetland habitat... including boardwalks and pontoons to provide access. We would suggest that this should be extended to:</p> <p>“new waterspaces and wetland habitat”,</p> <p>whilst retaining the “where appropriate” caveat.</p> <p>Paragraph 5.10.6 of the AAP notes: <i>The potential of further areas of the Lee Valley Regional Park to the north, east and south of Meridian Water to contribute to the area’s open space requirement.</i> This could include the provision of new waterspaces, which are included within the definition of open space within the NPPF. Should be considered further through the masterplanning of the Meridian Water development.</p>	<p>Amend the text of Policy EL9, 8th bullet point: <i>‘Where appropriate, that new waterspaces and wetland habitat is incorporated, including ...’</i></p> <p>Masterplanning work for Meridian Water must ensure full use is made of the area’s water resources; provision of any new waterspaces within Meridian Water must be considered among other land use requirements.</p>
Policy EL9	Environment Agency	23	Not stated	<p>The policy could make clear that the aim for new wetland habitat is also to enhance biodiversity and habitat availability - see comments on biodiversity in policies EL12 and EL27.</p>	<p>Update wording on Policy EL9 8th bullet point: <i>‘Where appropriate, that new wetland habitat is incorporated which enhances biodiversity, and includes-ing boardwalks and pontoons to provide access.’</i></p>
Para 5.11	Barratt Homes	15	Not stated	<p>Paragraph 1.3.1 states that the “Spatial Framework demonstrates both a vision and a potential way to deliver a high quality new mixed-use neighbourhood in Meridian Water.” Barratt Homes supports this approach.</p>	<p>The Council will make amendments to paragraph 5.11.1 as set out in the Schedule of Minor Amendments, item no. 30.</p>

				Paragraph 5.11.1 is rather more prescriptive and states that “Guidance on the Council’s spatial expectations is provided in the Meridian Water Spatial Framework and Meridian Water Spatial Scenario Testing documents”. Consider the approach within paragraph 1.3.1 to be correct as it allows for flexibility.	
Section 5.11.10 - 5.11.11	Environment Agency	23	Not stated	Please include additional wording to reflect that high quality public realm can also enhance biodiversity, wildlife provision and habitat connectivity. Enhancements to biodiversity and wildlife provision also create high quality public realm.	Update text at paragraph 5.11.10 as follow: <i>‘The plentiful and appropriate planting of trees and other greenery is essential to developing an aesthetically pleasing and high quality urban environment <u>which should provide habitat connectivity and enhance biodiversity.</u>’</i>
Policy EL10	IKEA PI Ltd	16	Unsound	<p>Consideration needs to be given to the existing IKEA store, its surface level car parking, and relationship to adjacent sites and proposed land uses</p> <p>The existing car parking operates nearly at capacity during the store’s busiest trading periods and additional parking spaces would be needed in the future for the car park to operate within capacity. However the proposed alignment of the Causeway passes within the immediate surrounding area of the store and proposes changes to the current surface customer car park located to the northeast of the store. This would require the removal of a significant area of the car park and its relocation to the south and west areas of the store (within the site boundary)</p> <p>Detailed work will be required to consider how this affects the operation of the store as well as the relationship between the spaces provided and the store’s entrance</p> <p>The impact of intensification of land uses upon the operation of IKEA must be considered</p>	<p>Making far more efficient use of the land at Meridian Water is vital to the success of this area. Existing areas of surface car parking are wasteful of space and the AAP evidence base establishes the high number of homes and jobs which can be achieved, based on the assumption of making better use of these car parks.</p> <p>Policy EL6 requires active frontages along the Causeway as development proposals and SPDs are brought forward – this approach will provide a move towards a greatly improved environment for new residents, workers and visitors. Likewise Policy EL10 is important to guiding</p>

				<p>Active frontage on the Causeway has the potential of conflicting with IKEA's operation and access arrangements</p> <p>The wording of the policy is too prescriptive. Suggested amendment to paragraph 2 Policy EL10 as follows: - Development proposals and supplementary planning documents are "encouraged to" instead of "expected to"</p>	<p>transformational change across Meridian Water and the Council does not wish to weaken the wording.</p>
Policy EL10	Canal & River Trust	18	Not stated	<p>The Trust welcomes the policy requirement for developments to "enable distinctive place-making by utilising the waterways as a defining feature of developments and ensure active frontages facing onto the River Lee Navigation".</p> <p>As noted previously, we believe that some qualification to the following statement is required: 'Orientate building heights and layouts to take advantage of views along the Lee Valley' - see comments on EL1.</p>	<p>See the response to Policy EL1 above – any proposal seeking to take advantage of views must also comply with other policy requirements, including accessibility and design context.</p>
Policy EL10	GLA	27	Not stated	<p>Section 5 and Policy EL10 infers that active frontage only relates to non-residential uses; however paragraph 2.3.3 (and Housing Standard 10) of the Mayor's Housing Standard SPG states that 'active frontages are defined as development frontage on the ground floor where inhabited residential or non-residential uses are located, with a visually permeable elevation (e.g. windows or glazing) and a generous distribution of entrances'. It is recommended that Policy EL10 makes this clear.</p>	<p>The Council will seek further discussion with the GLA on referencing active frontages in the ELAAP.</p>
Policies EL10 and EL11	GL Hearn on behalf of Tesco Stores Ltd	14	Not stated	<p>Tesco is keen to work with the Council to identify fundamental improvements that could be implemented to the design of the car park to contribute to sustainable development. It is noted that with the new Meridian Water Railway Station and improved accessibility the level of car parking required will reduce. Our client therefore looks forward to working with the Council to explore design options for</p>	<p>The Council will work with Tesco to explore how better use can be made of this site in the context of transformational regeneration.</p>

				<p>incorporating a rationalised car park in a sustainable way and improving the urban grain of the Meridian Water Opportunity Area.</p> <p>Welcome the mix of uses expected in the Meridian Water Opportunity Area, including commercial and non-residential uses on ground floor and lower floor levels, with residential on high floors. Supportive of the high quality and high density of development required, ensuring the viability of major infrastructure required by the development.</p> <p>Will work with the Council on producing a well-thought out design proposal for the site to ensure an appropriate level of residential amenity is achieved throughout the site.</p> <p>Strongly contended that the Tesco site represents an appropriate location for the delivery of a 'tall building' due to the improved transport infrastructure proposed and the increased capacity this will provide for Meridian Water.</p>	<p>Comment noted.</p> <p>The acceptability of tall buildings at this location will be dependent on numerous urban design factors, including set out in Policy EL11, Part C. The Council will engage with Tesco to consider potential approaches to regeneration of this site.</p>
Policy EL11	Barratt Homes	15	Not stated	<p>Requires buildings to “conform to a height-to-width ratio appropriate for the street, with an aspect ratio of 1:1 to 1:1.5” and “Ensure the massing and orientation of residential blocks allows direct sunlight penetration into at least 70% of shared open space”. This appears to be an overly restrictive policy for such a large regeneration project, and should be caveated with “where practical”.</p>	<p>The Council will seek further discussion to ensure the design requirements for height to width ratio, set out in Policy EL11, are appropriate and proportionate.</p>
Policy EL11	IKEA PI Ltd	16	Unsound	<p>Land is in mixed ownership and policy requirement for modification and adaptation of existing buildings and layout is prescriptive</p> <p>The market will influence the nature of the uses and the phasing of the development</p> <p>Policy is too prescriptive in requiring the adaptations of buildings and layouts. Regeneration of IKEA's site must come forward if it makes</p>	<p>Policy EL11 seeks to guide transformational change through the design and configuration of buildings and layouts. Developing Meridian Water will require some level of design accommodation by the existing retail operators, and this policy provides for this.</p>

				<p>business sense to IKEA. Request amended wording to bullet point 3 of Policy EL11 to read:</p> <p><i>- Consider the modification and adaptation of buildings and layout where possible, including those of existing retail operators, so that they support comprehensive regeneration</i></p>	
Policy EL11	Canal & River Trust	18	Not stated	<p>EL11 seeks to “maximise unobstructed long views from roof terraces”. Suggest that this should also be an aspiration for key areas of the public realm to aid wayfinding throughout the site. The River Lee Navigation corridor offers the opportunity to deliver these long views on a north-south axis through the site. The built form should respect this but also avoid a sense of canyoning that could be caused by the “walls” of tall buildings that policy EL11 correctly seeks to avoid.</p> <p>Welcome the support in policy EL11 for tall buildings to need to include measures to mitigate wind and microclimate issues in their surroundings. This gives sufficient scope to ensure that the impact on the navigation is considered, consistent with London Plan policy 7.7.</p> <p>Note that policy EL11 seeks to “avoid overshadowing of adjacent buildings, especially towards principal rooms”. It does not address the need to consider the overshadowing of the public realm. Whilst London Plan policy 7.7 does consider overshadowing more generally and would apply to the development (unless it is not retained in the forthcoming review of the London Plan), suggest this should be added to EL11 requirements.</p>	<p>The ELAAP provides broad design principles to guide development proposals and masterplans.</p> <p>Comment noted.</p> <p>The draft London Plan Policy D8 provides policy on this matter, requiring careful consideration that the impact of tall buildings does not compromise the sunlight penetration of open spaces.</p>
Policy EL11	Environment Agency	23	Not stated	<p>This policy should acknowledge that tall buildings will need to consider underlying geological and contaminative context and ensure that watercourses are not overshadowed.</p>	<p>Technical constraints will be examined during more detailed site assessments. The extensive area of Meridian Water will mean certain locations are more suitable for taller buildings, based upon a range of factors which may include contamination and potentially limitations on foundation depth.</p>

					The need to consider the impact of tall buildings on water spaces is required by the Draft London Plan Policy D8.
Policy EL11	GLA	27	Not stated	Policy EL11 states that 'no more than 10% of all north facing residential units are single-aspect'; however Housing Standard SPG states that 'single aspect dwellings that are north facing, or exposed to noise levels above which significant adverse effects on health and quality of life occur, or which contain three or more bedrooms, should be avoided'. It is recommended that Policy EL11 reflects this.	The Council will seek further discussion with the GLA on residential unit aspect requirements.
EL12 and paras 2.1 and 4.6	Historic England	06	Not stated	<p>The proposed area does not encompass known designated heritage assets, and it is acknowledged that the built environment is largely characterised by post war industrial estates and infrastructure. Consequently the proposed document does not appear to identify policies for the management of the historic environment beyond a requirement to demonstrate an understanding of industrial heritage and archaeology (Policy EL12).</p> <p>The historic significance of the Lee Navigation and associated industrial heritage, and archaeology are identified in the Proposed AAP (paras 2.1.4-6). The proximity of designated heritage assets beyond the boundary is also acknowledged. It is a requirement of national policy (NPPF paragraph 126) that Local Plans include a positive strategy for the historic environment.</p> <p>Therefore recommend that the document includes a section clarifying how the wider historic environment has been assessed, and in accordance with the NPPF, is to be managed.</p> <p>This section could usefully identify undesigned heritage assets, how the wider setting of heritage assets such as designated heritage assets at Chingford Mill and Ponders End Flour Mills, and Montagu Road Cemeteries are to be managed. Additionally it could indicate where new development will be required to undertake additional analysis</p>	<p>Enfield's approach to Heritage is established through a range of Local Plan documents, including the Core Strategy and DMD. The Council's Heritage Strategy of 2008 is currently being updated. The Local Heritage Review, which undertook a survey of local heritage assets, was completed in 2017.</p> <p>The Council will seek to discuss with Historic England how further wording could be included at paragraph 2.1.6 to clarify the borough's position.</p> <p>The heritage assets referenced here, with the exception of Montagu Rd Cemeteries, are located some distance from the ELAAP boundary and any effect of development is likely to be very low.</p>

				<p>and how this might reflect the historic environment, seeking opportunities to conserve this.</p> <p>The AAP could set how an overall positive heritage strategy might unite these through identification and interpretation. The AAP could include an overall positive heritage strategy to join together what might become disparate initiatives. This could include an overarching synthetic publication on the area's heritage.</p>	<p>Enfield Council has a borough-wide heritage strategy in place, and it is not considered that a further document specific to the ELAAP area is necessary.</p>
Policy EL12	Sport England	12	Not stated	<p>Sport England along with Public Health England have launched our revised guidance, Active Design, which intends to inform the urban design of places, neighbourhoods, buildings, streets and active open spaces to promote sport and active lifestyles. The guide sets out ten principles to consider when designing places that would contribute to creating well designed healthy communities which has considerable synergy to many of the objectives and potential policies expressed in the AAP.</p> <p>Sport England recommend that these links between the AAP and Active Design are developed further and really drawn out in the AAP by having clear references to Active Design, its principles and the Active Design Checklist within the document.</p>	<p>Amend Policy EL12 to incorporate reference to the Active Design guidance through inserting an additional bullet point to follow the 7th bullet:</p> <ul style="list-style-type: none"> • <u>Incorporate the principles from Sport England's Active Design guidance;</u> <p>(see <i>Schedule of Minor Amendments</i>, item 31).</p>
Policy EL12	Canal & River Trust	18	Not stated	<p>C&RT considers that the Navigation (and its towpath) will become a key part of the Meridian Water public realm and should be a central consideration in the masterplanning and development management of the site.</p> <p>Welcome the support in EL12 for "leisure uses on and adjoining the water, where appropriate". Given that the policy already includes the caveat "where appropriate", we consider that the policy should be extended to give this qualified support to commercial (such as café, retail or trip boats, for example) and residential uses on the Navigation. These uses are supported, subject to certain criteria by adopted policy DM75. Policy EL27 of this AAP re-emphasises the support for residential moorings but not commercial. Both could</p>	<p>As acknowledged, Policy EL12 provides support for commercial uses along the Navigation. The Council will seek discussion with C&RT on any Policy EL12 with regard to potential further wording, including on residential mooring.</p>

				<p>contribute positively to a vibrant and active waterway corridor public realm in Meridian Water, as well as providing additional natural surveillance. Support for residential moorings may help the Council to meet any needs identified in an assessment under section 124 of the Housing & Planning Act and contribute to delivering the objectives of the London Mooring Strategy, currently being prepared by the Trust.</p> <p>Careful consideration of appearance, layout, scale and massing, amongst other design considerations, will be needed to ensure that the regeneration of Meridian Water makes the most of the Navigation as an important piece of public realm. These issues should be considered as part of the requirement in EL11 for development to have a “direct, positive and productive relationship with the public realm”. A master plan approach will be hugely beneficial in delivering this and we welcome the Council’s intention to do this (as set out in paragraph 14.1.3 and 14.5.3).</p> <p>Welcome the approach of encouraging active frontages and natural surveillance along the canal corridor. Whilst we recognise that the plans and images included in the AAP are indicative, we question why active frontages along the River Lee Navigation are not shown in the area to the SW of the waterway in figure 5.4.</p>	<p>Comment noted. As stated in the response, specific design consideration should be carried out through more detailed masterplanning work.</p> <p>The locations shown in Figure 5.4 are indicative only and should not be considered as a final position.</p>
Policy EL12	NLWA	19	Not stated	<p>The policy should consider encouraging ‘recycling on the go’ unless this is properly addressed in the other policy documents that will have force in the AAP area. This could be implemented through the provision of separate street bins for items of waste that can be recycled and those that cannot.</p>	<p>Policy EL12 already includes a requirement for waste separation bins. The Council will seek further discussion with NLWA on Policy EL12 to clarify.</p>
Policy EL12	Environment Agency	23	Not stated	<p>The wording in relation to naturalisation should be strengthened and inclusion of the term "where appropriate" undermines the requirements set out in policy EL27 and the opportunities highlighted in Enfield Biodiversity Action Plan and Thames River Basin Management Plan Actions which we have previously provided.</p>	<p>Policy EL12 relates to the Meridian Water area where development will be the most intense. Policy EL27 refers to the entirety of the AAP, including areas of less intensive development.</p>

				<p>The wording "widening and restoration of the Pymmes Brook, Salmons Brook and Flood Relief Channels" which was previously included with policy EL8 has been removed. Concerned that the policy is not strong enough to require developers to deliver the ambition for soft landscaping as shown in the illustrative image on page 67. The opportunity to deliver environmental improvements is often subject to other pressures, as highlighted in your sustainability appraisal. Policies should be sufficiently robust to make sure environmental improvements are afforded appropriate weight and recognition. Evidence base documents such as the Enfield Biodiversity Action Plan and Thames River Basin Management Plan can bolster plan policies.</p> <p>The policies should recognise the value that ecological enhancements can offer beyond just the environmental ones. E.g. the Mayes Brook river restoration scheme which used an ecosystem services approach to assess the social and economic benefits derived from services provided by an enhanced ecosystem.</p> <p>Also see Policy 2 and supporting text on page 30 of the River Corridor Improvement Plan for an example of stronger policy wording.</p>	<p>The Policy EL12 reference to watercourses avoids specific labelling, ensuring that all watercourses within Meridian Water are subject to the policy requirements.</p> <p>The value of ecological enhancements is recognised in paragraph 5.11.10 - text updates to clarify this are set out in the table below.</p>
Section 5.12, Policy EL13	Thames Water	07	Not Stated	<p>Thames Water do not object to the policy in principle, but consider that it needs to be improved in relation to water supply and sewerage infrastructure.</p> <p>A key sustainability objective for the preparation of the Local Plan should be for new development to be coordinated with the infrastructure it demands – see NPPF para. 156.</p> <p>The (NPPG) includes a section on 'water supply, wastewater and water quality' (Para 001, Reference ID: 34-001-20140306).</p> <p>It will be necessary for investigations to be undertaken to review the impact of the development in relation to water.</p>	<p>Ensuring the supply of fresh water, disposal of waste water and treatment of surface water run-off are planning applications requirement, and must be demonstrated for any proposals coming forward at Meridian Water.</p> <p>Policy EL13 identifies the key principles in determining the content and level of corresponding planning obligations. The infrastructure items listed are priorities but the list is not exclusive.</p>

				<p>Thames Water would welcome the opportunity to work with the Council and developer on opportunities for water efficiency for the new development.</p> <p>In principle there is likely to be drainage capacity available for the development. However there may be the need for localised upgrades and specific requirements for certain development sectors.</p> <p>Thames Water consider that a comprehensive Water Supply and Drainage Strategy for the Meridian Water proposals should be prepared by the Developer/Council in consultation with Thames Water and the Environment Agency.</p> <p><u>Proposed Change:</u> Text making reference to the requirement for a comprehensive Water Supply and Drainage Strategy should be included within the revised document along the lines of the following: [see submission for text]</p>	<p>The Council will seek further discussion with Thames Water on Policy EL13 regarding the provision of sufficient water infrastructure to support the development of Meridian Water.</p>
Policy EL13	Sport England	12	Not stated	<p>The residential development that is required would have an impact on existing sporting provision by increasing demand and developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up-to-date Sports Facilities Strategy, Playing Pitch Strategy or other relevant needs assessment.</p> <p>It is concerning that despite the focus on health and access to sports facilities and open space throughout the document Policy EL13 does not list sport, recreation and leisure facilities as infrastructure s.106 obligations would contribute towards. This policy, therefore, should be amended to include the reference to such facilities so it is clear to developers that developer contributions and/or CIL would be used to fund sporting infrastructure to meet the community need.</p>	<p>The list of infrastructure provision in Policy EL13 is not exclusive and the Council may request contributions for sport, recreation and leisure facilities. Support for contributions for these uses is also provided in Enfield's Section 106 SPD (2016).</p>
Policy EL13	IKEA PI Ltd	16	Unsound	See comments to EL5	See response to EL5 above.

Policy EL13	Canal & River Trust	18	Not stated	<p>Welcome the specific support for securing improvements to waterside public realm through planning obligations in EL13. The plan could also encourage applicants to include the waterside and waterway within the boundary of their sites, where relevant, to ensure that the public realm is planned, and improvements delivered, in a way that its integrated with the development. Other local planning authorities in London, such as the LLDC, adopt this approach.</p>	<p>The Council will need to understand more fully the implications of encouraging applicants to include waterside and waterway within the boundary of their site, and will seek further discussion with C&RT on Policy EL13.</p>
Policy EL13	Environment Agency	23	Not stated	<p>Pleased to see the inclusion of flood defences within the list of infrastructure provision. Blue and Green infrastructure should be included within the list in part a to secure funding for watercourse improvements that deliver environmental enhancements.</p>	<p>Policy EL13 already references infrastructure provision for waterside public realm improvements and new and improved open space. The Council will also seek further discussion with the EA on the potential to include blue and green infrastructure.</p>
Paragraph 6.4.3 Figures 6.1, 6.2 Policy EL14	LaSalle Investment Management and Aytans MFG Co UK Limited. (Turley)	10	Unsound	<p>The new allocation of Deephams Sewage Treatment Works within the ELAAP area as SIL is not justified as a suitable, appropriate or effective strategy to replace that which would be lost at the Stonehill Estate and/or to maintain capacity for employment of industrial, logistics and distribution uses when considered against the alternative of retaining the 9.5 ha of the Stonehill Estate (and Harbet Road estates) as SIL.</p> <p>Allocating land such as the Deephams STW which Thames Water fully intends to continue using as operational land (which itself will serve the infrastructure needs of new development) is unrealistic, undeliverable and cannot properly be regarded as offering usable 'capacity' or a 'reserve' for industrial, logistics and related uses</p> <p>Furthermore, the Deephams land (and the parcel to the north of Deephams and strips of land to the east) are more remote and less accessible to the North Circular than the Stonehill Estate. Qualitatively, and in terms of the characteristics of SIL outlined in the</p>	<p>It is recognised that the Deephams site will continue in ongoing use as an operational sewage treatment works. The Council considers, however, that designation of Deephams STW as SIL is in conformity with the London Plan - which allows utilities infrastructure.</p> <p>As set out in the response above, the Council will seek to discuss with Thames Water wording at paragraph 6.4.4 to clarify that the Deephams site will continue in ongoing use as an operational sewage treatment works.</p> <p>While the proposed new SIL to the north and east of Deephams would partially offset the SIL loss at Harbet Rd, the key reason for</p>

				<p>London Plan44 the suggested new SIL allocations are far less suitable to and will not re-provide the usable quantum of SIL that would be lost from the de-designation of the Stonehill Estate or Harbet Road.</p> <p>For these reasons, the Deephams STW, parcel to the north of Deephams and strips of land to the east should not be regarded as suitable or reasonable replacements for the de-designation of the Harbet Road SIL. The proposed SIL allocation for Deephams STW should be removed as new SIL from draft Policy EL14, the Policies Map, Figure 6.1 and Table 6.2.</p>	<p>de-designation of SIL at Meridian Water is to allow comprehensive regeneration and the delivery of thousands of new homes and jobs.</p>
Figure 6.1	GLA	27	Not stated	<p>For clarity an additional map showing current SIL and LSIS designations should be included.</p>	<p>The Council will seek to discuss with the GLA the most suitable way of showing SIL and LSIS designations in the AAP.</p>
Table 6.2, Paragraphs 6.4.4-6.4.5 and Policy EL14	Thames Water	07	Unsound	<p>Chapter 6 of the ELAAP includes the proposal in Policy EL14 to allocate the Deephams Sewage Works site as Strategic Industrial Land (SIL). It is considered that this proposal is not Sound and not in accordance with feedback from the GLA.</p> <p>The Council has not provided adequate justification for the proposed designation, with the ELAAP simply identifying that the site has an industrial character. Whilst this may be the case, the ELAAP does not recognise that the Deephams Sewage Works site is wholly owned by Thames Water and that the entire area is defined as Operational Land for the purposes of sewage treatment. The site is in ongoing use as a sewage works and is currently being that will see development take place that will ensure its ongoing operational use for a period extending at least beyond the life of the ELAAP.</p> <p>The ELAAP also (in paragraphs 6.4.4 and 6.4.5) suggests that designation of the Deephams site as SIL “would consolidate and strengthen the protection of the area for future employment uses”.</p> <p>The proposed SIL designation is considered to be potentially misleading as the implication of SOL designation is that there is the potential for employment development or redevelopment of the site,</p>	<p>The AAP recognises that the Deephams site will continue in ongoing use as an operational sewage treatment works, with Chapter 9 dedicated to supporting the site.</p> <p>The Council considers, however, that designation of Deephams STW as SIL is in conformity with the London Plan - which allows utilities infrastructure – and will clarify the policy position with the GLA.</p> <p>The Council suggests that wording be inserted into paragraph 6.4.4 to clarify that the Deephams site will continue in ongoing use as an operational sewage treatment works, subject to further discussion with Thames Water.</p>

				<p>un-related to its operations sewage works use. This runs contrary to Thames Water’s investment in the site for wastewater treatment use.</p> <p>On the basis of all of the above, Thames Water objects to the proposed designation of the Deephams Sewage Works site as SIL in Policy EL14 of the ELAAP, as referred to in Chapter 6 and identified on the Proposals Map.</p> <p>Thames Water has raised the issue of large, operational, sewage works in London being designated as SIL with GLA Planning Officers and they agreed that this was not appropriate.</p> <p><u>Proposed Change:</u> All references to the proposed designation of Deephams Sewage Works as SIL should be deleted from the ELAAP.</p>	
Para. 6.5.9	Environment Agency	23	Not stated	Eley Road is also affected by flood risk and invasive species, which should be added to the description.	The issues in paragraph 6.5.9 reflect work carried out on industrial users of Eley’s Estate for the Industrial Estates Strategy; referencing flood risk or invasive species are not relevant to this section.
Policy EL15	Barratt Homes	15	Not stated	Barratt Homes supports the removal of the Strategic Industrial Location (SIL) designation from the Harbet Road Industrial Estate as set out at paragraph 5.4.11 and illustrated at Figure 6.1. For clarity this deallocation should be referenced within Policy EL15 itself, given it is fundamental to the future regeneration of Meridian Water. Note that the declassification of the southern portion of Montagu Road Industrial Estate which lies within the Meridian Water boundary Locally Significant Industrial Site (LSIS) is referred to.	The ELAAP document establishes the new SIL and LSIS boundaries through Figure 6.1, and the accompanying ELAAP Policies Map. Specific reference to the declassification is not required in Policy EL15.
Policy EL16	GLA	27	Not stated	Policy EL16 for employment and mixed uses is supported, as is the clause that residential uses will not be appropriate on this site.	Comment noted.

Section 8.2	Environment Agency	23	Not stated	Other sources: National Policy Statement for Energy (EN-1) – This overarching National Policy Statement sets out the Government’s policy for delivery of major energy infrastructure.	At Section 8.2 insert in the table under ‘Other Sources’: <u>‘National Policy Statement for Energy (EN-1)’</u>
Chapter 8 and Policy EL17	NLWA	19	Not stated	The proposed development at the EcoPark, authorised by the DCO, includes the design outline and BREEAM levels which were consulted on in detail as part of the application process. The AAP should specifically acknowledge that the standards that will be applied to the DCO development will be as set out in the DCO and associated certified documentation, and that additional standards will not be applied. The certified documentation is set out in Article 33 of the DCO, and will include the Environmental Statement and the Design Code Principles which were reviewed in detail by LB Enfield during the application process.	The referencing of the DCO through Chapter 8 and Policy EL17 requires further discussion between the Council and the NLWA.
Policy EL17	Environment Agency	23	Not stated	Should include environmental improvements, ongoing maintenance of habitat along the waterways and management of invasive species. The DCO committed to the clearance, re-landscaping, planting and ongoing maintenance of an 8 metre buffer zone alongside the Enfield Ditch (main river). The landscaping works have yet to be designed/agreed but are likely to include a riverside path and native planting. A commitment for remediation of contaminated land and protection of groundwater should also be included as the site is in a Source Protection Zone (SPZ1).	See the NLWA response above regarding Chapter 8 and Policy EL17, including reference to the DCO.
Section 9, Policy EL18	Thames Water	07	Unsound	Largely support Policy EL18 and supporting text as a number of changes have been made in light of previous representations. However, Thames Water considers that the proposed wording of the section in relation to the proposed SIL designation requires amending;	Welcome support for Policy EL18.

				deleting Para 9.1.5 as references to the designation of the site as SIL should be deleted (see separate representation on section 6 and Policy EL14).	See response below to Chapter 6 and Policy EL14.
Figure 8.1 Figure 10.1	NLWA	19	Not stated	Both diagrams lack a key to explain the symbols used. Reference to the granting of the DCO should be included.	Update the AAP to include keys for Figure 8.1 and Figure 10.1. The DCO will be referenced in the text but does not require adding to the key.
Section 10.1	Vibrant Partnerships	24	Not stated	We understand that the designation of Picketts Lock site is as 'a major developed site in the green belt' and that this will remain until the Council completes its review of green belt boundaries in time for the new draft Local Plan. We suggest that this designation should be reviewed by the Council as part of this area action plan consultation so that the widest possible leisure provision can be considered for Picketts Lock. With the built developments previously on the site and the current built developments, it is questionable whether this site contributes to the tests required by the NPPF (2012) as required for greenbelt land.	The designation of 'major developed site in the green belt' was established by the adopted Core Strategy and remains extant. It is not clear to the Council that the locations referred should be removed from the green belt criteria. Any proposed changes to the green belt boundary will be subject to green belt review and, if appropriate, will be made through the new Local Plan.
Paragraph 10.1.3 and throughout the document	TfL	27	Not stated	The AAP development assumes uplift in PTAL of 4-6 and 'Urban' character, from a low base – an aim TfL supports. The additional transport provision required to support an increase in housing numbers is not clearly set out in the AAP. The transport assumptions of 4 trains per hour in 2018 and 8 tph in 2022 are not committed. The STAR service is 2 tph between Stratford and Meridian Water, while other Greater Anglia services will stop at Meridian Water and Ponders End. At present the total frequency of trains calling at Meridian Water is 2-4 ph. Enfield Council is working with GLA, TfL, Network Rail, Greater Anglia and the DoT to increase the service frequency, potentially by introducing a shuttle service from Tottenham Hale.	The Council would like to further discuss with TfL the references to the increase in train services in paragraph 1.1.4, Objective 3, paragraphs 5.8.16 and 11.5.2, and Table 14.1. Update paragraph 10.1.3: <i>'To take advantage of step-change improvements to transportation links in the area, including a significant increase in the number of four trains-per-hour from 2018</i>

				The text reads as though the plans to introduce the service uplifts are confirmed. TfL is not aware of current plans to increase frequency to 8 tph from 2022 and further capacity is unlikely to be available at Stratford to facilitate this proposal. 4 tph is not deliverable in 2018. Meridian Water Station due to open in 2019.	and eight trains per hour from 2022 on the railway line between Brimsdown and Stratford;
Section 10, Policy EL19, EL20	Thames Water	07	Unsound	<p>Deephams Sewage Works is due to undergo a major upgrade which is due to be completed in 2018 and will significantly reduce odour emissions from the site. However, it will not be possible to completely eliminate odour and there are other odour sources in the locality.</p> <p><u>Proposed Change</u> Incorporate text to require a technical assessment to be undertaken to confirm that either: (a) there is no adverse amenity impact on future occupiers of the proposed development from industrial and utility related development; (b) the proposed development can be conditioned to ensure that any potential for adverse amenity impact can be avoided/mitigated.</p>	The Council will seek further discussions with Thames Water and – because this relates to Picketts Lock - the LVPRA, to assess the appropriateness of incorporating the proposed changes.
Policies EL19, EL20	Christian Action Housing Association	13	Not stated	Revitalising Developed Areas at Picketts Lock - support the aspiration to deliver a large significant new development that will provide a destination attraction for Edmonton Leaside and beyond.	Policies EL19 and EL20 support making much better use of the Picketts Lock site.
Policy EL20	Environment Agency	23	Not stated	Development proposals should be encouraged to be accompanied by details of proposed ecological enhancement works in addition to a management and maintenance plan. This should promote increased ecological connectivity along the watercourse and enhancement of habitats. Supporting text should identify opportunities for biodiversity enhancement.	Policy EL20 already requires development proposals to demonstrate landscaping strategies, including tree, shrub and wild flower planting, to enhance ecological links to the wider Edmonton Leaside area, and to be accompanied by an integrated long-term landscape and ecological management and maintenance plan.
Policy EL20	Vibrant Partnerships	24	Not stated	Welcomes the opportunity for the 're-use or redevelopment of existing open space at Picketts Lock' but with the current constraints of green belt designation this may limit the scope	

				and ambition for the site. We would support the retention and provision of some publicly available open space on the site and the enhancement of cycling and pedestrian routes through and around the site. Equally, there may be scope for very modest residential development on part of the site linked to other existing residential areas in the vicinity that could help improve the access, infrastructure, safety and general community visits and community safety on and around the site to help 'lift' the area generally.	The ELAAP does not seek any changes to the green belt boundary. Any alternations to the green belt boundary will be made through the new Local Plan.
Section 11.3	TfL	27	Not stated	Also add modal shift to public transport, which is much preferable to shared mobility (car clubs, electric private vehicles).	Update paragraph 11.3.2: <i>'Sustainable transport will be supported through high quality public realm and a modal shift towards public transport. Greater rates...'</i>
Policy EL21 Figure 11.1 Supporting Text Section 11	IKEA PI Ltd	16	Unsound	Whilst it is important to promote pedestrian and cycle routes there must be recognition that this area serves substantial existing operators who, whilst supporting modal shift to public transport, principally rely on cars and that the AAP is promoting substantial employment and residential development. Insufficient transport assessments have been undertaken to establish if the proposals can support existing and future operators. See comments to EL6	Detailed movement and transport capacity assessments, will be carried out as development proposals and detailed masterplans are brought forward. It would be premature to establish such specific evidence at this stage.
Policy EL21	Canal & River Trust	18	Not stated	Welcome the requirement that "development proposals which include or are adjacent to Towpath Road and along the River Lee Navigation towpath must deliver significant improvements to the continuous north-south route for pedestrians and cyclists from Tottenham Hale, through Meridian Water, to Enfield Lock.	Comment noted.

Policy EL22	IKEA PI Ltd	16	Unsound	<p>See comments to EL6</p> <p>Policy EL22 does not acknowledge the existing arrangements on Glover Drive and how they might be affected by the Causeway. Suggest wording change of bullet point 3 to:</p> <p><i>- provision of pedestrian and cycle facilities <u>that integrate within the existing highway network</u></i></p>	Detailed road network and junction designs, along with capacity assessments, will be carried out as development proposals and detailed masterplans are brought forward. It would be premature to establish such specific network plans and evidence at this stage.
Policy EL22	Canal & River Trust	18	Not stated	<p>As with the Causeway Bridge, the Trust's agreement will be required for a bridge in this location. Suggest that discussions on the bridge should begin in good time to ensure that our requirements as landowner can be factored into the scheme design and costing. Welcome the requirement for improved public realm to be delivered alongside schemes for new bridges.</p> <p>Suggest that the space below and alongside the NCR is an example of the type of under-bridge environment that should be avoided. It detracts from the quality of the Blue Ribbon Network, and the extent to which it provides an attractive sustainable travel route, in this part of the Lee Valley. Suggest that the AAP should, at least within the supporting text, include an action to improve this space, consistent with EL13 and EL21.</p>	<p>Detailed assessment and design work for bridging over the River Lee Navigation will include consultation with C&RT.</p> <p>The Council will seek further discussion with C&RT to clarify concerns on the under-bridge environment, and how the ELAAP could be used to avoid this.</p>
Policy EL22	Environment Agency	23	Not stated	The principles should be balanced with the need to protect and enhance biodiversity and ensure no increased flood risk. There are opportunities to include enhanced buffer zones between paths and rivers, improving habitat and connectivity.	The focus of EL22 is on new and improved cycle routes – flood risk and biodiversity are addressed in other policies.
Policy EL22, Figure 11.1	Vibrant Partnerships	24	Not stated	The draft Plan's assessment of Picketts Lock as being relatively inaccessible is agreed, but the Plan does not appear to seek a significant solution to address this apart from the development of a pedestrian/cycle bridge to connect with communities to the west. Given the plan's focus on delivery it has to be realistic in understanding the constraints on developing Picketts Lock and the proposals for this bridge crossing need careful scrutiny given the	Figure 11.1 sets out proposed location of a potential new connection from the Ponders End area towards Picketts Lock. It is recognised that this would be a partial solution, with future work needed to further increase accessibility. Funding for a bridge is not a requirement in the AAP. The

				<p>'burden' they may place on the costs of development at this site. Recommend that publicly funded infrastructure projects are considered to help the step change in regeneration at Edmonton Leaside. Specifically, the relocation south of the existing Ponders End station would better serve the Picketts Lock site. We would ask that this is considered as part of an overall package of measures linked to the CrossRail 2 scheme.</p>	<p>Council will seek further discussions with the LVRPA to address concerns on this area.</p> <p>The location of stations will be considered a part of the process of progressing Crossrail 2; it would be premature to establish a position for this section of the railway line.</p>
Policy EL23	Committee Member of the Enfield Transport Users Group	02	Not stated	<p>The "Action Plan" provides no proposals to materially alter the poor PTAL of the area other than some vague references to cycling and reducing parking provision.</p> <p>Enfield's main statement regarding rail is that the line delivers few stopping services and blocks people from cycling.</p> <p>Additional proposals are for buses, to pick up on the AAP's statement that residents east of the Borough are twice as likely as other residents to take the bus.</p> <ul style="list-style-type: none"> - Extend the 24hr 102 bus from Edmonton Green to the Athletics Centre at Picketts Lock. - Subsequently, extend the W8 from Edmonton Green to Tottenham Hale via Meridian Water - The W6 can be extended to Ponders End Bus Garage via Galliard or Nightingale Road. - The other major issue is that there are no north to south bus routes through the AAP - To resolve this matter, I seek a bus from Waltham Cross or Enfield Island Village to Tottenham Hale via Enfield Lock, Brimsdown, Ponders End and Meridian Water of at least 4 buses per hour to begin with. - A similar service could connect through from Enfield Town or Waltham Cross via Ponders End High Street and Nightingale Road, again, at least 4 buses per hour. 	<p>The AAP provides numerous policies to radically improve the PTALs, in particular through improvements to rail infrastructure and bus services – see EL7 and EL23.</p> <p>The Council is engaged in dialogue with TfL to provide bus services which effectively supports the ELAAP area and the wider eastern Enfield corridor. Amendments to and provision of bus routes will be addressed through agreements as the developments at Meridian Water are brought forward.</p>

				<ul style="list-style-type: none"> - This could potentially for a bus from Chingford to Tottenham Hale via Meridian Water. It could be an extension of the 379 bus, which at present provides a paltry 9min long journey to the Yardley Estate. - The 505 bus from Harlow to Chingford has an unlikely terminus there. Harlow is far better related to the industrial areas of the Lea Valley4e. - Extend these routes and the existing 192 to Seven Sisters, because at present there is no rail or bus link between the Overground and Meridian Water without a laborious change - There is space between Tottenham Marshes and Tottenham Hale on the A1055 for a bus lane on the approach to Tottenham Hale, utilising an existing central reservation <p>Keen to explore whether a discussion could be had between the Enfield Transport Users Group and the Stratford Transport Implementation Group regarding Rail Future's Lea Valley, Phase 2 proposal. Suggest a new metro rail link with 6 trains per hour to Stratford. Of particular interest to TFL, Network Rail, Abellio Greater Anglia and Westfield Shopping Centre would be the excellent journey opportunities this would provide to Stratford for rail passengers at Tottenham Hale travelling from Kings Lynn, Cambridge, Stansted Airport and Hertford East.</p>	
Policy EL23	IKEA PI Ltd	16	Unsound	Requires consideration of potential impact on IKEA customers and servicing accesses. Need to consider impact on both vehicular access arrangements and safe customer pedestrian access. Insufficient assessment or explanation of how it will serve proposed future development and capacity on surrounding network. Greater flexibility required including consideration of alternative routes.	Detailed road network and junction designs, along with capacity assessments, will be carried out as development proposals and detailed masterplans are brought forward. It would be premature to establish such specific network plans and evidence at this stage.
Policy EL23	TfL	27	Not stated	This policy should be used as an exemplar for other policies. Needs to be some interaction between walking and cycling policies/ network. The bus hierarchy might well look like the cycling and walking routes identified in Figure 11.1.	Not clear from this comment whether amendments are sought – the Council would like to discuss further with TfL.

Policy EL24	Canal & River Trust	18	Not stated	<p>Suggest that the policy could go further by requiring that applications for developments adjacent to the Navigation above a suitable threshold submit a waterborne freight feasibility assessment for transporting demolition waste and construction materials.</p> <p>As with EL12, the policy should be extended to give support to commercial and residential uses on the Navigation, where appropriate.</p>	<p>The support for waterborne freight transport provided by Policy EL24 is considered to be sufficient and proportional.</p> <p>The Council will seek further discussion with C&RT on Policy EL24 regarding wording around uses on the Navigation.</p>
Policy EL24	Environment Agency	23	Not stated	<p>Supportive of the use of waterways for transportation but recommend early engagement with EA, particularly with regard to the floating classroom proposal. A floating classroom would not meet the national policy requirements, as educational institutions are considered a more vulnerable use which are considered inappropriate if located in flood zone 3.</p> <p>The general principles of this policy should be balanced with the need to protect and enhance biodiversity and ensure no increased flood risk. E.g. controlling the numbers of boat users, keeping river margins free of mooring to provide refuge areas for wildlife. River margins and channel should not be overshadowed as this prevents plant growth and reduces habitat.</p>	<p>Policy EL22 states that any proposals will be considered through consultation with the relevant statutory organisations. The 'floating classroom' is referenced by way of an example, and any proposal would be subject to consultation. This policy should be read in conjunction with EL27 and EL28 with reference to habitat, nature conservation and biodiversity.</p>
Policy EL24	TfL	27	Not stated	<p>TfL is keen to promote more water freight in London. To do so locally need to define water kinds of water freight the Council would seek to grow in Edmonton Leaside and the land use and infrastructure implications. In the absence of specific types of growth, the following actions aimed at growing water-based freight are recommended:</p> <ul style="list-style-type: none"> - Protect key wharfs and road access to them through the planning process. - Establish a working group with the LPA, potential freight operators, end users, and Canal & River Trust to growth the borough's long-term ambitions. 	<p>Policy EL24 provides support for freight transport by water to help alleviate the road network, and requires any proposal to undergo consultation with the statutory bodies. To maintain a flexible approach the policy avoids detailed prescription.</p>

				<p>The amount of locks and poor water infrastructure within the borough constrain the development of this mode in Enfield.</p> <p>Further guidance on water freight forms part of the Mayor's Transport Strategy, published 2017.</p>	Water infrastructure can be improved to support increased usage.
Policies EL24 and EL27	Vibrant Partnerships	24	Not stated	Welcome the Plan's proposals of increasing the use of waterways for leisure and including the potential for residential use. Would welcome discussions as part of the consultation on this Plan with Vibrant Partnerships, Enfield Council, LVRPA and Canal and River Trust to explore this further in relation to the Picketts Lock site and potential mitigation requirements/ considerations of surface water/flooding management associated with Meridian Water.	The Council will seek discussion with Vibrant Partnerships on the Picketts Lock site and potential mitigation considerations of surface water. Flood management associated with Meridian Water.
Section 11.8	IKEA PI Ltd	16	Unsound	As above the authority must ensure that there is appropriate car parking to serve existing and future development.	Section 11.8 confirms the need to have regard to London Plan and DMD parking standards, and to ensure that for new developments parking functions satisfactorily.
Section 11.9	IKEA PI Ltd	16	Unsound	This section acknowledges the need for modelling. Insufficient assessments have been undertaken to support the proposed allocations and road proposals. This is exacerbated as the schemes and in particular the road alignments are too prescriptive. The policies require greater flexibility.	Policy EL25 is worded to provide a flexible approach to design of the road network. The Council will seek discussion with IKEA to consider further.
Policy EL25	IKEA PI Ltd	16	Unsound	See comments to EL6	See response to EL6 above.
Paras 12.1.2, 12.1.3	LaSalle Investment Management and Aytans	10	Unsound	The need for new development to embrace the principles of sustainable design and construction to both mitigate and adapt to climate change is acknowledged.	The Council will make amendments to paragraphs 12.1.2 and 12.1.3 as set out in the <i>Schedule of Minor Amendments</i> , items no's. 39 and 40.

	MFG Co UK Limited. (Turley)			<p>New development within the ELAAP should only be expected to achieve the sustainable design and construction standards as set out in Development Plan policy in Table 12.2 and should not be expected to go beyond these requirements to secure 'the highest standards for sustainable design and construction'.</p> <p>Inclusion of this text is confusing and creates uncertainty with regards to the standards which new development should seek to achieve. In the absence of any evidence or policy wording to introduce new sustainable design and construction standards, the wording is not justified and is therefore unsound. The text should be amended to implement only those standards within adopted planning policy.</p> <p>The alterations required to the ELAAP which should be made are therefore:</p> <ul style="list-style-type: none"> - Deletion of the words 'The Council is committed to achieving the highest standards for sustainable design and construction within the borough' from paragraph 12.1.2 - Deletion of the words 'This includes the incorporation of solar panels and ground source heat pumps. The Council will seek to attain the BREEAM highest levels for new developments' from paragraph 12.1.3. 	
Section 12.3 EL26	LaSalle Investment Management and Aytans MFG Co UK Limited. (Turley)	10	Unsound	<p>The ELAAP seeks to introduce new targets for sustainable design and construction which are not clear, nor are they supported by the evidence base or Development Plan policy wording.</p> <p>Paragraph 12.3.6 of the ELAAP summarises the proposals of energetik to deliver this network. However, these are only conceptual in nature and no specific evidence has been provided to support the ELAAP which demonstrates any of the following:</p> <ul style="list-style-type: none"> a) that the LVHN is technically viable given the proposed building types within the ELAAP and the encouragement for buildings to 	<p>Evidence for the LVHN has been developed through the <i>Upper Lee Valley Decentralised Energy Network Pre-Feasibility (2011)</i> and the <i>ULV DEN Feasibility Study (2012)</i>.</p> <p>The investment case for Energetik was agreed at Cabinet in January 2017.</p> <p>The Council therefore has a clear case for the provision of a viable DEN in and around Meridian Water.</p>

			<p>deploy other renewable energy technologies in addition to connecting to the LVHN;</p> <ul style="list-style-type: none"> b) the network is deliverable from a commercial perspective and can deliver heat at a competitive rate; c) all reasonable alternatives have been explored to deliver carbon savings; d) the local gas network has sufficient capacity and pressure to meet the requirements of the heat network within the ELAAP; e) the routes for the pipe network which are crucial to the installation of the site wide system are capable of being delivered and free from constraints; and f) the LVHN is still viable in carbon terms when taking into account electricity grid decarbonisation and applying current and future anticipated electricity emissions factors. In particular, the policy requirement for developments to install CHP at a later date if the LVHN fails to materialise has the potential to increase the quantum of gas CHP in the LVHN mix, at a time when associated emissions would be higher than with a gas boiler solution for that development; and g) the environmental effects of the ERF (for example in terms of air quality) on occupiers of new homes and employment uses at Meridian Water have been <p>adequately assessed in determining the location and appropriate and target levels of development for Meridian Water in the ELAAP.</p> <p>With regards to Policy EL26, there are very specific requirements within this policy – in Parts C and D - that have not been subject to viability testing or are justified by an evidence base. We are particularly concerned with the requirements of Part D of Policy EL26, as it is mandating the use of a specific temporary technology along with the use of a specific energy supplier. In the absence of any specific evidence base or justification, this will add significant commercial and technical constraints to new development and remove the opportunity for new development to source the most competitive energy supplier. Furthermore we consider there to be a significant conflict of interest with the deployment</p>	<p>The Council will make amendments to Policy EL26, Part C, as set out in the <i>Schedule of Minor Amendments</i>, item no. 55.</p> <p>The requirement for all major developments to connect to or contribute towards existing or planned DE networks is already established in adopted policy DMD 52. Policy EL26, Part D reinforces this approach.</p>
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				<p>of the LVHN and the creation of ‘energetik’ given that Enfield Council is a stakeholder within the business and therefore is in a position to gain financially from the success of the LVHN.</p> <p>In order for much of Policy EL26 to be justified, independent evidence base studies should be undertaken in accordance with the requirements of the NPPF which investigate the commercial and technical viability of the LVHN against the specific proposals of the ELAAP. The Council should also consult with all appropriate stakeholders to develop an appropriate scope of work for the evidence base study to support the requirements of Section 12 of the ELAAP and Policy EL26. Without this, and for the reasons stated, the policy wording needs to be comprehensively reappraised.</p>	
Paras. 12.1.3 and 12.1.7	NLWA	19	Not stated	<p>This paragraph states that developments must make full use of carbon saving technologies and approaches including the use of solar panels and ground source heat pumps as well as the Council’s intention to seek the highest BREEAM scores for new developments. Para. 12.1.7 raises the potential to use waterways to cool buildings by using canal water and heat exchangers. These requirements may impose unreasonable technical or financial burdens on developers. These features should be desirable rather than a requirement and could consider requiring developers to demonstrate that they have been given full consideration in any future proposals.</p>	<p>The Council will amend paragraph 12.1.3 as set out in the <i>Schedule of Minor Amendments</i>, item no. 40, to provide consistency with other Plan documents.</p> <p>Paragraph 12.1.7 encourages the use of heat exchange technology using the canal water, but does not require it.</p>
Para. 12.3.3	NLWA	19	Not stated	<p>Revise text to refer to the DCO and that the DCO takes precedence over any local planning policy.</p>	<p>Delete this paragraph as the text can be removed without reducing the effectiveness of the ELAAP position on the DEN.</p>
Paras. 12.3.4 and 12.3.6	NLWA	19	Not stated	<p>The text should make clear that these paragraphs refer to the energy centre proposed by the Lee Valley Heat Network and not the future Energy Recovery Facility that is permitted by the grant of the DCO. Any further ambiguities in the AAP should be clarified too.</p>	<p>See the <i>ELAAP Schedule of Minor Amendments</i> for amendments to paragraphs 12.3.4 and 12.3.6. Clarification between the Lee Valley Heat Network and Energy Recovery Facility is added to paragraph 12.3.5 (see below).</p>

Para 12.3.5	NLWA	19	Not stated	The consent described in this paragraph has now been granted and the text should be updated to reflect this. The text should also be corrected as follows: 'North London Waste Management Plan'. The DCO is not part of the North London Waste Plan and this incorrect statement should be corrected.	See the <i>ELAAP Schedule of Minor Amendments</i> for amendments to paragraph 12.3.5.
Para 12.3.7 EL26 Part B	NLWA	19	Not stated	Propose that paragraph 12.3.7 and EL26 Part B are removed as these matters are subject to the DCO which has already been granted and ongoing negotiations about commercial terms for a lease agreement with the Lee Valley Heat Network. Part D on page 139 must be subject to the terms of the DCO and any supply of energy from the existing energy from waste facility or the planned Energy Recovery Facility is subject to commercial terms which are currently being negotiated and cannot be overridden by this plan. It would also be inappropriate for the AAP to control the layout of private roads within the EcoPark site.	See the <i>ELAAP Schedule of Minor Amendments</i> for amendments to paragraph 12.3.7 and Policy EL26 Part B.
Para. 12.3.10	NLWA	20	Not stated	It is not clear what justifies the precedence of the Decentralised Energy Network SPD over the Mayor of London's Standards and this should be fully explained.	Update paragraph 12.3.10: 'Should there be a conflict between the DEN SPD specifications and the Mayor of London's standards then the DEN SPD specifications take precedence.'
Policy EL26	Canal & River Trust	18	Not stated	There may be opportunities to lay infrastructure to help deliver heat from the Lee Valley Heat Network (as well as other infrastructure) below the surface of the towpath of the River Lee Navigation, subject to agreement with the Trust. Any crossing of the Navigation will require the agreement of the Trust. The appearance and character of the Blue Ribbon Network would be best supported by integrating these into planned bridges, particularly the Causeway, or laying pipes under the Navigation.	Policy EL26 would provide support this approach to heat network infrastructure if required. A more detailed examination of the heat network infrastructure routes will be established though later work coordinated by Energetik – the Council's heat network company.

Policy EL27	Canal & River Trust	18	Not stated	<p>Consider that the policy provides a very good framework to ensure that the River Lee Navigation becomes a central part of the placemaking strategy for this area through masterplans and the development management process.</p> <p>EL27 currently states that: "Development proposals must protect and enhance habitats and biodiversity, through measures including softening of river channel edges". On the Navigation, this may not be consistent with the other aims for the waterway set out in policy EL27 and the remainder of the plan. Suggest the words "where appropriate" should be added to the end of this point of the policy.</p> <p>We estimate that there is approximately 45MW of heating and cooling potential in our London waterways, which could supply approximately 24,000 homes in London. The technology required to deliver cooling from canal and dock water is already successfully used in London. We welcome the requirements on EL27. The policy should also recognise the possibility of using the waterway for heating, especially prior to the establishment of the Lee Valley Heat Network or where it is inappropriate or not viable to connect to it. Suggest a lower threshold for testing the feasibility of using canal water for heating and cooling could even be applied to allow for changes in technology and viability over the lifetime of the plan.</p>	<p>Comment noted.</p> <p>Update the wording of Policy EL27, 5th bullet point: <i>'Development proposals must protect and enhance habitats and biodiversity, through measures including softening of river channel edges where appropriate.'</i></p> <p>The potential of energy transfer of heating or cooling is significant, and the Council will seek further discussion with C&RT on Policy EL27 regarding use of waterways to provide cooling or heating.</p>
Policy EL27	Environment Agency	23	Not stated	<p>Pleased there is an overarching policy within the document which focuses on watercourses within the plan area. Section 13.1.15 notes that increased usage of the watercourses can increase pressure on and negatively affect biodiversity and it needs to be clear in the policy that development must not result in a negative impact on the environment. It is positive that development proposals and SPDs must protect and enhance habitats through measures including softening river channels. This policy should be made stronger to ensure that all riverside development must explore the possibility of naturalising the watercourse fully and include an 8 metre set back free from built development to provide a natural buffer and prevent overshadowing of the channel - see comment above. Also beneficial to</p>	<p>Policy EL27 provides for improved opportunities for access, usage and regeneration, while balancing the need to protect and enhance habitats and biodiversity. The Council will seek further discussion with the EA on the wording of Policy EL27</p>

				include wording within the policy to ensure that residential moorings must be designed in a way to ensure that the environment is not negatively affected.	
Section 13.4	Thames Water	07	Not Stated	<p>Land Thames Water own to the South of William Girling Reservoir and land Thames Water own at Harbet Road (to the south of the North Circular) are identified in the Meridian Water SPD and supporting technical documents as a flood storage proposal.</p> <p><u>Proposed Change</u> Reference should made for the need for the Council to work with Thames Water to agree a way forward for proposals involving Thames Water land at Harbet Road and to the south of William Girling Reservoir.</p>	Section 13.4 is not specific to any location; further work will need to be undertaken to select the most suitable location for any flood storage. Policy EL8 makes clear that the Council will work in partnership with stakeholders, including Thames Water to secure an integrated and sustainable approach to the management of development and flood risk.
Section 13.5, Policy EL28	Thames Water	07	Not Stated	<p>New and Existing Open Spaces</p> <p><u>Proposed Change</u> Reference should made for the need for the Council to work with Thames Water to agree a way forward for proposals involving Thames Water land at Harbet Road and to the south of William Girling Reservoir.</p>	The need to work with Thames Water is already addressed through the following text in Policy EL28: <i>'The Council will work with stakeholders, including landowners, to bring forward new areas of open and green space ...'</i> .
Policy EL28	Canal & River Trust	18	Not stated	The NPPF definition of open space includes waterspaces. As such, the policy would support their development, where appropriate, within this part of the Lee Valley. We suggest that such opportunities should be considered further, with the Trust, as part of more detailed masterplanning work.	As stated in the response, further consideration of additional waterspaces should be carried out through more detailed masterplanning work.
Policy EL28	Environment Agency	23	Not stated	Section 106 agreements should only be used as a last resort if it has been shown that no biodiversity enhancements can be provided on site. This policy should also make reference to the multiple use of green spaces for example sports pitches could also be used as flood storage capacity.	Update text for EL28 as follows: <i>'There is also potential to improve the access and functions at existing green and open spaces including at Picketts Lock and Kenninghall Open Space. Green and open</i>

					<i><u>space should be explored for multiple uses, including as providing potential flood storage capacity.</u></i>
Part D	IKEA PI Ltd	16	Unsound	<p>As outlined in sections above the land is in multiple ownership. It is important to understand how the authority anticipates that the various phases will be delivered, recognising the requirement for flexibility</p> <p>Equalisation of values to enable delivery of facilities required to enable the wider redevelopment.</p> <p>How will community facilities will be funded, phased and delivered?</p> <p>How will impacts upon existing businesses be considered?</p> <p>How will existing businesses be maintained during construction?</p>	<p>Section D provides indicative phasing, acknowledging that Meridian Water is likely to develop at different rates in different areas. Ongoing design and masterplan work will provide a more focused phasing plan.</p> <p>Delivery of community facilities will be in line with the quantum of development, as established by Policy EL5.</p>
Section 14.2	Environment Agency	23	Not stated	Please note that the EA have areas of landownership and rights within the plan area and would expect to be consulted on any CPOs affecting these rights.	Extensive discussions would be undertaken with landowners in advance of any proposed CPO.
Section 14.4 Figure 14.1	GL Hearn on behalf of Tesco Stores Ltd	14	Not stated	Support Phase 1 of development as this will increase accessibility to the Meridian Water Opportunity Area as a whole and specifically Tesco's site. However, Tesco's site is proposed to come forward as Phase 3 of the Meridian Water Opportunity Area. Tesco's site is available, achievable and deliverable. In accordance with the NPPF, the site is deliverable as it is available now, in a sustainable location and achievable in that housing can be delivered on site viably within the next five years. The site is in a location where no early infrastructure is required for the site to come forward for development and therefore early delivery of units to achieve this target could be provided. It is not encumbered by any further transport infrastructure needs to start delivering sustainable	Figure 14.1 provides indicative zones only, with the AAP setting a flexible zonal approach to development. The Council will work with Tesco Stores Ltd to establish how this area of Meridian Water can most effectively deliver the optimum regeneration.

				development. Therefore, it is urged that the Council consider the opportunity for the early delivery of the redevelopment of the existing Tesco Extra within the phasing of the Meridian Water development.	
Para 14.4.5	Barratt Homes	15	Not stated	Support Figure 14.1 which identifies “indicative zones”. However Paragraph 14.4.5 states that the “AAP sets a flexible framework for phasing ... to enable phases of development to come forward”. Do not consider that the AAP should set any form of phasing for this significant redevelopment due to the complexity and numerous factors which will influence the final phasing of delivery. Remove first sentence of paragraph 14.4.5.	Figure 14.1 provides indicative zones only, with the AAP setting a flexible zonal approach to development. The Council will work with stakeholders to establish how Meridian Water can most effectively deliver the optimum regeneration.
Table 14.1	Environment Agency	23	Not stated	Confirm what is meant by provision of floodplain compensation in place ahead of development.	The Council would like to discuss with the EA how the wording could be clarified.
Table 14.1	Environment Agency	23	Not stated	There is no reference in this table to any projects which will deliver watercourse enhancements for biodiversity improvement, yet this is set out in objectives 4 and 5 for the AAP.	The Council will seek further discussion with the EA on watercourse enhancement projects regarding Table 14.1.
Table 14.1	TfL	27	Not stated	The A406 is part of the Transport for London Road Network (TLRN) – the AAP proposed removal of the access ramp with Aragon to the A406. TfL technical approval would be needed. TfL and the Council will need to work together on any proposals within, over, under or adjacent to the A406 to improve connectivity and the quality of the environment taking into account the existing nature of this road and the functions it will continue to perform.	Noted
Table 14.1	TfL	27	Not stated	Significant investment will be needed in the bus network prior to 5,000 homes, and to deliver 10,000 homes will require Crossrail 2. Therefore we would include the following projects in Table 14.1: - Early bus network for Meridian Water - developer contributions, TfL – this should be developed alongside the Meridian Water Highway Infrastructure Study and borough-wide service review as well as through individual sites.	The Council agrees that significant investment in the bus network will be needed to deliver the homes at Meridian Water. The ELAAP supports this most strongly through policies EL7, EL22 and EL23.

				<ul style="list-style-type: none"> - Upper Lea Valley transport modelling and bus priority study – TfL, Enfield, Haringey – this study should be completed summer 2017. - Meridian Water to Edmonton Green direct bus link – outcome should define bus infrastructure design and how it fits into the wider bus network. 	The Council will seek further discussion with TfL regarding these proposed project additions to the Table 14.1.
Table 14.1	TfL	27	Not stated	There are 3 entries for the bus network in terms of delivery. TfL has appointed Arup to prepare the Upper Lee Valley transport modelling and bus priority study – this will identify infrastructure needed to deliver growth in the ULV, including Edmonton Leaside.	The Council will seek to discuss the Table 14.1 bus network entries further with TFL.
Para. 14.6.7	Environment Agency	23	Not stated	We are pleased to see a commitment to work with the EA and suggest a meeting to discuss the comments set out in this consultation response.	The Council will seek further discussion as per the responses noted above.
General	Health & Safety Executive	01	Not stated	<p>There is the potential for land allocated in your plan to encroach on consultations zones, namely:</p> <ul style="list-style-type: none"> - Calor Gas Ltd, Stacey Avenue, Edmonton. N18 3PE - Shell Gas Ltd, Picketts Lock Lane, Edmonton. N9 0AS - Thames Water Utilities, Deepham Water Treatment Works, Picketts Lock Lane, Edmonton. N9 0BA <p>The potential for encroachment is being brought to your attention at an early stage so that you can assess the actual extent of any incompatibility on future developments. Information on the location and extent of the consultation zones associated with major hazard establishments and MAHPs can be found on HSE’s extranet system along with advice on HSE’s land use planning policy. Lists of all major hazard establishments and MAHPs, consultation zone maps for establishments, and consultation distances for MAHPs are included to aid planners. All planning authorities should have an authorised administrator who can access HSE’s Planning</p>	Potential for any encroachment and conflict with the zones detailed will be addressed during the pre-application and application process on a site-site by basis.

				<p>Advice Web App; further information is available on HSE’s website: http://www.hse.gov.uk/landuseplanning/padhi.htm. When sufficient information on the location and use class of sites becomes available at the pre-planning stages of your local plan, the use of the Web App could assist you in making informed planning decisions about development compatibility.</p> <p>The guidance in HSE’s Land Use Planning Methodology, available at http://www.hse.gov.uk/landuseplanning/methodology.pdf will allow you to identify compatible development within any consultation zone in the area of your local plan. HSE recommends that you include in your plan an analysis of compatible development type within the consultation zones of major hazard establishments and MAHPs based on the methodology.</p>	
General	Natural England	03	Not stated	<p>See many opportunities in the ELAAP for the implementation of connected green infrastructure and green space. Connected green space is essential for species adaptation to climate change.</p> <p>Concern over the possible recreation disturbance impact to the Walthamstow Reservoirs SSSI/ Lee Valley SPA/Ramsar site. This site is within 800m of Meridian Waters’ 5,000-10,000 new households. Policy EL9 states “The pressure on land availability may result in some open space being provided beyond Meridian Waters, requiring development proposals to show how good linkages to this space can be provided”. We would not support any linkages being provided between Meridian Waters and Walthamstow Reservoirs. This point would also be applicable to Chingford Reservoirs SSSI if ‘permit access only’ restrictions were to be removed.</p> <p>The Habitat Regulation Assessment states that policies EL19 and EL20 (Picketts Lock site) will mitigated recreational impacts. However, Picketts Lock is 2.7km from Meridian Waters and will not be as accessible as Walthamstow Reservoirs (800m) unless access to the designated site is seriously restricted. Policy wording needs to include a statement that there will be no accessible linkages between</p>	<p>Policy EL9 seeks to ensure that developments are supported by sufficient green space for the new residents of Meridian Water. The Council supports enabling much better use of the Lee Valley Regional Park for residents through improved accessibility and environmental quality. Any proposal must meet the statutory and policy requirements in terms of environmental protection.</p> <p>It should be noted that the Walthamstow Wetlands have recently been partially opened for public access by the London Borough of Waltham Forest. There are no specific plans in the AAP to achieve a direct link to the wetlands.</p>

				Meridian Waters and Walthamstow Reservoirs or the conclusions drawn by the HRA will not be applicable.	
General	LVRPA	05	Not stated	<p>The proposals will have a significant impact on the Regional Park given their scale and proximity. Many of the proposals are to be welcomed in the regeneration of such a large area of underused former employment land to create a high quality and sustainable neighbourhood. It is to be hoped that the anticipated levels of investment will further stimulate developer interest in sites such as Picketts Lock and other parts of the Regional Park. A step change in the regeneration of this area could be delivered.</p> <p>The draft AAP recognises the importance of the Regional Park as a recreation and leisure asset. Whilst this is to be commended it underplays the importance of those areas of marginal land such as ‘Harberts Hump’ which are identified as contributing to the green spaces within the masterplan area. Officers consider that with some significant remodelling there could be some scope for development on this site which could support the Council’s aspirations for new employment opportunities. Further the site should be de-designated from the green belt. The site fails to contribute to the ‘tests’ required by the National Planning Policy Framework (2012) required for greenbelt land.</p> <p>The draft plan doesn’t fully recognise the Regional Park’s offer as a place for biodiversity with important habitats protected by local designations such as the SINC along the Navigation corridor. Policy in this area needs strengthening. Also the draft plan does not include policies to adequately articulate how access improvements to open spaces adjacent to the North Circular could be realised.</p> <p>The proposals for Picketts Lock accord with the Authority’s adopted position in its PDF and the likely shape of future proposals included in recent marketing work by officers to secure new investment in commercial leisure opportunities. However the proposals still retain the designation of the site as ‘a major developed site in the green</p>	<p>The ELAAP supports the need to make better use of the potential offered by the Regional Park, particularly at Picketts Lock.</p> <p>Proposals for development within the LVRP will be subject to the planning process. The Council has not seen evidence that the locations referred to by the LVRPA have been demonstrated as not meeting the green belt criteria. – any changes to the green belt boundary will be made through the new Local Plan. The Council will seek further discussions with the LVRPA to identify the locations referred to and consider LVRPAs aspirations.</p> <p>The importance of habitats and biodiversity is recognised in the APP, see policies EL20 and EL28. The Council will seek further discussions with the LVRPA to identify any further additions which could benefit the AAP.</p> <p>The designation of ‘major developed site in the green belt’ was established by the adopted Enfield Core Strategy. The MDS designation does not preclude development opportunities for Picketts Lock to come forward.</p>

				<p>belt'. Whilst it is understood that this designation will remain until the Council completes its review of green belt boundaries in time for the new draft Local Plan it is considered that the opportunity, afforded by this consultation, should be taken by officers to object to this designation because it imposes an unnecessary constraint on development opportunities. It is questionable whether this site contributes to the tests required by the National Planning Policy Framework (2012) as required for greenbelt land.</p> <p>Despite the draft Plan's assessment of Picketts Lock as being relatively inaccessible it does not seek a significant solution to address this apart from the development of a pedestrian/cycle bridge to connect with communities to the west. Given the plan's focus on delivery it has to be realistic in understanding the constraints on developing Picketts Lock and the proposals for this bridge crossing need careful scrutiny given the 'burden' they may place on the costs of development at this site.</p> <p>The Authority's requests made in response to other draft plans prepared by your Council for the relocation south of the existing Ponders End station to better serve the site have not been addressed in this draft. This could be considered as part of an overall package of measures linked to the CrossRail 2 scheme.</p>	<p>Any proposed future change to Enfield's green belt boundary will be subject to a Green Belt review and considered through the new Local Plan.</p> <p>Figure 11.1 sets out proposed location of a potential new connection from the Ponders End area towards Picketts Lock. It is recognised that this would be a partial solution, with future work needed to further increase accessibility. Funding for a bridge is not an AAP requirement. The Council will seek further discussions with the LVRPA to address concerns on this area.</p> <p>The location of stations will be considered a part of the process of progressing Crossrail 2; it would be premature of the ELAAP to set out alternative infrastructure for this section of the railway line.</p>
General	Historic England	06	Not stated	<p>The most important archaeological site in Edmonton Leaside was found off Glover Drive and excavated in 2004. This was a 'Dark Age' (5th century AD) timber platform interpreted as a 'crannog'.</p> <p>Further remains related or similar to the Glover Drive structure would be considered undesignated heritage assets of national importance equivalent to a scheduled monument. This should be an early consideration in relation to the proposed 'causeway route' and</p>	<p>Consideration for the identification and protection of potential archaeological remains will be carried out as part of the planning application process.</p>

				related development for which pre-application consultation with GLAAS is recommended.	
General	Historic England	06	Not stated	Support the recognition of industrial heritage and archaeology under Policy EL12 and suggest that it is strengthened to refer to providing appropriate evaluation, mitigation (e.g. through archaeological investigation informing design/layout) and interpretation (e.g. through public art or interpretation panels). The River Lee Navigation runs through the area providing a focus for where the local heritage could be interpreted.	The Council is pleased that Historic England recognise heritage support of Policy EL12, and will seek further discussion on the potential for further wording enable development to respond appropriately to the heritage of the area, including opportunities for interpretation.
General	Historic England	06	Not stated	Strategic Industrial Locations (east of railway): There is potential for deeply buried archaeology and palaeo-environmental remains (including Ice Age 'Arctic Beds') deeply buried beneath modern made ground associated with historic industry. Major developments in this area should be supported by geo-archaeological assessment and appropriately targeted mitigation following approaches already taken at Deephams and the Eco Park. The River Lee Navigation runs along the eastern side of the SIL where the local heritage could be interpreted whilst a further, more ambitious possibility might be to re-open the natural course of the river as a new water feature drawing the distinction between the 'natural' (albeit man-modified) river and the artificial cuts.	Consideration of archaeological remains will be carried out as part of the planning application process. Reopening a historical or natural route for the River Lee is not supported by current planning documents, and it would not be appropriate to introduce at this stage of the AAP.
General	Enfield Transport Users Group	08	Not Stated	The plan notes that there are transport 'issues' in the area, but offers no real proposals to resolve them. Residents in that area are currently twice as likely as residents elsewhere in Enfield to take the bus to work. There is currently a two mile gap between existing stations at Angel Road and Ponders End. Provision for a new station at Picketts Lock should be made.	The AAP provides numerous policies to radically improve PTALs, in particular through improvements to rail infrastructure and bus services – see EL7 and EL23. The location of stations will be considered a part of the Crossrail 2 programme; it would be premature to establish a position for this section of the railway line.

General	Enfield Transport Users Group	08	Not Stated	A council estate close to Ponders End that is ripe for renewal and many areas where development could take place mean that ETUG would like to see Ponders End developed to its full potential, although we understand that a limiting factor is that the Mayor has said this would require a 6 trains/per hour service. To do this would require 'quad tracking', which is currently not planned/proposed under the ELAAP.	The Council supports plans to improve rail infrastructure and the frequency of services along this line, including 4-tracking and Crossrail 2.
General	Enfield Transport Users Group	08	Not Stated	While housing development west of the line does not appear to be planned at present we would support such development and this in turn would be facilitated by our suggested static improvements. The station would then support potential redevelopment at the Picketts Lock Athletic Centre. The station would also allow for pedestrian access from Boundary Road.	Regeneration at Meridian Water does include plans for a substantial area of housing – along with other supporting uses - to the west of Meridian Water Station.
General	Enfield Transport Users Group	08	Not Stated	Bus route W8 could also allow direct access from Bush Hill and onward access to (for example) Stratford. It could support a Mayoral Housing Action Zone along with industrial development at Claverings. There is also a 1980s flatted council estate that could be redeveloped. A Mayoral Housing Zone would bring money into the borough; LBE would be looking at delivering in 2026, with housing delivery in 2030/32 along with Crossrail 2.	The Council is engaged in dialogue with TfL to provide a bus service which supports the ELAAP area and the wider eastern Enfield corridor. Amendments to and provision of bus routes will be addressed in coordination with TfL as the developments at Meridian Water are brought forward.
General	Enfield Transport Users Group	08	Not Stated	The Lea Valley line has a half hourly Hertford East - Liverpool Street stopping service and a half hourly Bishops Stortford - Stratford service. Both services skip certain stations and Angel Road is served by the Stratford trains only during peak hours Monday - Friday. The first stop northbound after leaving Angel Road is Waltham Cross; this does not help in making journeys to London from Borough of Enfield Stations.	The relocation and renewal of Meridian Water Station and the provision of a third track to Tottenham Hale are already underway and will allow a significant improvement in the rail service level. Further line upgrades are expected in the future, e.g. a fourth track, will further improve service levels.
General	Enfield Transport Users Group	08	Not Stated	Crossrail 2 and a rebuilt Angel Road station (to be renamed Meridian Water) south of the North Circular Road will enable access to thousands of jobs within a twenty five minutes train journey. But there is no other bus or rail service or connectivity proposed within	The AAP provides numerous policies to greatly improve transport levels and accessibility. Policy EL7 supports an improved bus interchange at Meridian

				the ELAAP. In addition the ELAAP criticizes the area for having 'too much parking'. If parking is reduced and there are no additional trains or buses this will bring a serious problem, with people struggling to travel to or from the area.	Water which connects to the wider North London region.
General	Enfield Transport Users Group	08	Not Stated	Part of the proposed development area is green belt, so the only development allowed is leisure-based. It is a long straight route so therefore could be conducive to developing rowing facilities along the Lee. However there is a poor train service and limited ability to improve this, with no funding at the moment. But it would be possible to improve the bus service.	The AAP does not propose change to the green belt boundary. It does, however, seek to make better use of several green belt locations in terms of quality of the environment, accessibility, and the leisure offering.
General	Enfield Transport Users Group	08	Not Stated	Bus route W6 is a single decker service, which is inadequate for the developments planned on the Eastern side of Meridian Way. It would be better for bus route W8 to be extended and re-routed through to Meridian Water – this is a double decker and is a more frequent service. Re-routing would add another 20 minutes making a total journey time of one hour. That is considered to be quite sustainable and it could also be extended to run on to Tottenham Hale.	The Council is engaged in dialogue with TfL to provide a bus service which supports the ELAAP area and the wider eastern Enfield corridor. Amendments to and provision of bus routes will be addressed in coordination with TfL as the developments at Meridian Water are brought forward.
General	National Grid (Amec Foster Wheeler)	09	Not stated	<p>National Grid identified the following high voltage overhead powerlines as falling within the Neighbourhood area boundary:</p> <ul style="list-style-type: none"> - ZBD Route – 275kV from Tottenham substation in Haringey to Waltham substation in Waltham Forest - ZBC Route – 275kV from Tottenham substation in Haringey to Waltham substation in Waltham Forest <p>From the consultation information provided, the above overheads powerlines do not interact with any of the proposed development sites.</p> <p>Gas Distribution – Low / Medium Pressure: Whilst there are no implications for National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within</p>	Development proposals will be assessed to ensure they do not impact on, or take account of, gas and electricity infrastructure. The National Grid will be consulted on any proposals as they are brought forward.

				<p>proposed development sites. For further information in relation to the Gas Distribution network contact plantprotection@nationalgrid.com</p> <p>National Grid has provided information in relation to electricity and transmission assets via the following internet link: http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/</p>	
General	Highways England	11	Not stated	<p>Highways England's interest in the AAP relates to the potential impact of resulting development traffic from sites within the development boundary on the SRN, in this case the M25, M1 and M11. Highways England notes that the AAP seeks to regenerate and develop the Central Leaside area bringing a substantial number of new homes and employment to the area including the Meridian Water development and the development of Edmonton Eco Park.</p> <p>It is pleasing to note that the council will seek to positively promote walking and cycling by requiring improvements to existing routes and by providing additional connectivity into and through the area. Also support encouraging the use of public transport by working with TfL and service providers to increase frequency and expand routes in the Central Leaside area. Further demand management measures also include parking control. All measures should be considered ahead of major infrastructure improvements and accept that there will be a need to undertake some local network improvements.</p> <p>It should be noted that Highways England have not been consulted on the Meridian Water development. It is a large development with quite a high number of proposed two-way trips (16000 AM Peak and 11000 PM Peak) and it is likely that these could impact on the SRN; more specifically M25 J25. A detailed application for this site is expected later in 2017 and we would like to be consulted on this. An assessment of how this development impacts the local road network and SRN should be included within this detailed application. It would be useful to be included in pre-application discussion either jointly with Enfield or directly with the proposed developers.</p>	<p>The Council is promoting a modal shift away from private motor vehicles and towards walking and cycling, and the use of public transport.</p> <p>Highways England will be consulted as specific development proposals are brought forward.</p>

				Highways England have no immediate concerns with the Plan and therefore look forward to working with Enfield Council and neighbouring authorities as and when identified sites are brought forward for development.	
General	Sport England	12	Not stated	The NPPF identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. It is important to positively plan for sport, recreation and healthier lifestyles by preventing the unnecessary loss of sports facilities and having an integrated approach to providing new housing, employment land and community facilities. It is therefore key that the Edmonton Leaside AAP reflects this aim to ensure it complies with National Planning Policy, particularly the NPPF paragraph 73, and Sport England's objectives.	See more detailed responses below.
General	Christian Action Housing Association	13	Not stated	Supports very strongly the ambition that is contained in this plan, particularly for the development of a new urban neighbourhood at Meridian Water, the emphasis on economic growth and the priorities given to connectivity. We also welcome the statements about water and green spaces and sustainable regeneration.	The Council welcomes that CAHA supports the ambitions for Meridian Water.
General	GL Hearn on behalf of Tesco Stores Ltd	14	Not stated	Welcomes the Council's commitment to the comprehensive regeneration of the Meridian Opportunity Area, and the wider borough, through the preparation of the ELAAP.	The Council welcomes that Tesco supports the comprehensive regeneration aims of ELAAP.
General	GL Hearn on behalf of Tesco Stores Ltd	14	Sound	Tesco Stores Ltd. believe that the vision is positively prepared, justified, effective, consistent, and is therefore 'sound'.	Comment noted.
General	Healthwatch Enfield	17	Not stated	The concerns of local people about current access to GPs, and also the changing pattern of delivery of health and care services, must be taken adequately into account in planning the timing and scale of primary care and other health and care services and support in the community.	Policy EL5 required that appropriate healthcare facilities are delivered in accessible locations; developments may be required to make financial contributions toward provision. The policy makes clear that accessibility is important, and that healthcare facilities should explore co-

				We strongly endorse the point made by NHS Enfield Clinical Commissioning Group (CCG) in their response to the 2015 draft Area Action Plan that any infrastructure created must not only be timely, but also flexible.	location and allow flexible access to services.
General	Healthwatch Enfield	17	Not stated	We would also welcome your confirmation that a full health impact assessment either has been or will be carried out in good time to feed in to the development plans.	Health impact assessments will be carried out for development proposals as required.
General	Canal & River Trust	18	Not stated	The Trust considers that the policies in the AAP set a largely sound framework for the development of Meridian Water as a place that recognises and supports the River Lee Navigation corridor's role as a key part of the public realm of the development.	The River Lee Navigation is a distinctive component of the area and provides a unique resource to support regeneration.
General	Hertfordshire County Council	22	Not stated	HCC Property (Development Services) on behalf of HCC services have no comments to make on the Consultation on the Proposed Submission Edmonton Leaside AAP.	Comment noted.
General	Environment Agency	23	Not stated	<p>It is expected that there will be general levels of contamination present that may have impacted groundwater, or that could be mobilised during any redevelopment. In order to achieve this, where developments are proposed within SPZ1s or on sites where historic contamination is likely to present a significant risk to groundwater, the EA expects developers to submit a Preliminary Risk Assessment in support of any planning application. This requirement should be included within an area wide policy:</p> <p>We strongly recommend the inclusion of a policy within the plan to address land contamination.</p> <p>The area designated within the plan is underlain by the Principal chalk aquifer, which is an important regional source of drinking water supply and has six Source Protection Zones (SPZs) in place to protect it.</p>	<p>Planning applications for contaminated land already require a preliminary risk assessment.</p> <p>Retaining existing cover for sites that are left undeveloped would not be a problem, however, putting in a new protective cover is likely to be very expensive for land owners.</p>

			<p>The chalk forms part of the Upper Lee Chalk Water Framework Directive (WFD) groundwater body, currently classified as having poor chemical status. The area is characterised by both previous and current industrial land use and it is expected that there will be general levels of contamination present that may have impacted groundwater, or that could be mobilised during any redevelopment. Particular attention should be given to the Willoughby Lane Gas works, which we have had significant involvement with as a result of levels of contamination present.</p> <p>Any development will therefore need to be protective of groundwater, particularly where it occurs within an SPZ1, and must avoid causing further deterioration in groundwater quality (both within the Upper Lee Chalk and the superficial Secondary aquifers), and result in a level of betterment. A policy should therefore be included to achieve this. The policy should ensure that developments are appropriately located and where the risks to groundwater from the proposed development are unacceptable the application should be refused. This in line with paragraph 109 of the NPPF, the requirements of the Thames River Basin Management Plan and with our groundwater protection Position Statements (GP3).</p> <p>Due to the sensitivity of this plan area and the high number of potentially contaminated sites developments should consider the geological context in terms of foundation depths and building height design. The plan indicates that there are to be numerous tall buildings which are likely to require deeper foundations. The underlying geology and presence of contamination may restrict the depth of foundations which can be used and therefore impact on the design of the development.</p> <p>We also recommend the inclusion of a mechanism within a policy to consider meanwhile uses in respect of contamination to detail the minimum requirements expected where meanwhile uses are proposed on sites which are known to be</p>	
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				contaminated. We also expect any sites which are to be left undeveloped for the time-being should, as a minimum, be protected to minimise further leaching and migration of contaminants for example by retaining, or placing an impermeable protective surface layer.	
General	Environment Agency	23	Not stated	<p>We strongly recommend a plan wide policy to safeguard the waste capacity provided by sites in the plan area including mechanisms for relocation and improving environmental quality.</p> <p>There are 37 waste sites in the plan area which collectively manage a large tonnage of waste – approximately 1.4 million tonnes, received not just within Enfield and London, but across the country. The Edmonton EcoPark provides around half of this capacity but the rest is provided by the permitted sites. The plan contains a policy for the Edmonton EcoPark site but does not currently consider the provision of capacity from the other permitted sites in the area and how these might be safeguarded or facilities developed.</p> <p>Many industrial areas within the plan area are also included within the North London Waste Plan as areas to safeguard or provide capacity in the future. Under the Duty to Co-operate you should work with the NLWP to ensure that you have complimentary policies in relation to safeguarding waste capacity.</p> <p>The Sustainability Appraisal does not currently expect significant effects of the plan from a waste perspective. The inclusion of a policy to ensure that waste sites are appropriately safeguarded, designed and clustered where possible, may result in an overall positive effect on the environment. Particularly if sites can be clustered and infrastructure upgraded. Encouraging enclosure of expansion of existing and new waste facilities would also contribute to improving air quality and provide further positive effects. The NLWP has committed to including a requirement for enclosure of waste facilities in their policies. Suggest the following text:</p>	<p>The reference to 37 is borough-wide; the number of sites within the ELAAP boundary is significantly fewer.</p> <p>The Council is fully aware of the importance of the waste sites located in the area. However, the proper mechanism for safeguarding waste sites as required by the London Plan will not be through this AAP but rather through our ongoing local plan review as well as through the ongoing production of the North London Waste Plan (NLWP), as we will have to consider this in the round. This will have to take into account all projected waste capacity and need in the borough and in the wider NLWP area as well as local and wider area regeneration aspirations and other relevant considerations. We do not wish to prejudice either our local plan nor the NLWP production process.</p> <p>The duty to cooperate is not in this case relevant as we are part of the ongoing NLWP production and are actively participating in this group to bring relevant policies forward for adoption.</p> <p>Regarding clustering of waste sites, this is something that is already happening and</p>

				<p><u>Where waste facilities are sited in an Air Quality Management Area and close to sensitive receptors we will normally require that the operations will be carried out within a covered building enclosed on all vertical sides with access and egress points covered by fast acting doors which default closed in order to minimise local public health and environmental impact. This is regarded by the Environment Agency, Boroughs and GLA as best practice for waste sites.</u></p>	<p>further being promoted through the NLWP, however this must and will be weighed up against the potential negative cumulative effects from too extensive a concentration of waste uses and a lack of spatial distribution to service the wider area.</p> <p>Enclosure of new sites and associated benefits will be ensured through the requirements made as part of EA licensing of waste sites. This, as well as improvements to the design and environmental quality of existing and new sites will be promoted and welcomed by the NLWP. We have passed your suggested wording to the NLWP for consideration.</p>
General	Vibrant Partnerships	24	Not stated	<p>Vibrant Partnerships is the trading name of Lee Valley Leisure Trust. We are a charitable organisation which manages and operates leisure venues within the area covered by the ELAAP.</p> <p>Vibrant Partnerships works in partnership with the Lee Valley Regional Park Authority (LVRPA) to provide high class management of the sporting, leisure and recreation facilities on Picketts Lock and our vision with the LVRPA, is to create regionally important visitor destinations but also for local people to enjoy.</p>	Comment noted.
General	Vibrant Partnerships	24	Not stated	<p>Anticipate the Draft Plan proposals having a significant impact on the wider Regional Park given their scale and proximity. Many of the proposals are to be welcomed in the regeneration of such a large area of underused former employment land to create a high quality and sustainable neighbourhood. It is to be hoped that the anticipated levels of investment will further stimulate developer interest in sites such as Picketts Lock and other parts of the Regional Park. A step change in the regeneration of this area could be delivered.</p>	<p>The broad-based approach to regeneration of the ELAAP area will enable greater use of the LVRP and help to underpin investment proposals in sites such as Picketts Lock.</p>

General	Education and Skills Funding Agency	25	Not stated	Significant growth in housing stock is expected in the borough; the AAP confirms that up 5000 new homes will be needed within this area by the end of the plan period in 2032. This will place additional pressure on social infrastructure such as education facilities.	The ELAAP addresses the need for additional school place provision through Policy EL5 on Community Facilities in Meridian Water.
General	Education and Skills Funding Agency	25	Not stated	Please advise the ESFA of any proposed changes to the emerging AAP policies, supporting text, site allocations and/or evidence base arising from these comments.	The Council will contact the ESFA to discuss the comments and responses.
General	Enfield Health (Barnet, Enfield and Haringey Mental Health Trust)	26	Not stated	Support the response to the ELAAP made by Enfield Healthwatch in their letter of 28 th April 2017. Particularly concerned regarding access to local and GP primary care for residents and would like to hear how the Council will progress this with Enfield CCG.	Comment noted. Refer to the Council's response to the Enfield Healthwatch submission.
General	Enfield Health	26	Not stated	Wish to register their concern regarding progress on the development without sufficient attention being paid to the impact on stretched mental health and community health resources. Request to hear how the Council is factoring this into commissioning plans for Children's Health Services and Children and Adolescent Mental Health Services (CAMHS) over the coming years and what discussions it has had with the CCG concerning additional support for mental health including access to IAPT.	Council services are aware of rising demand from the borough's increasing population and the need to plan for this.
General	GLA	27	Not stated	Other than the approach to industrial land release, the stated vision and objectives for the Edmonton Leaside area, and in particular the Meridian Water Regeneration Area, are supported, in line with the ULVOAPF and London Plan. An updated OAPF is currently being updated to better reflect expected population growth, transport movements, Housing Zone status and increased housing targets for a number of areas, including	The Council will be closely involved in preparation of the OAPF and agrees that the plans must be as closely aligned as possible.

				Meridian Water. It is essential that strategic and local plans are as closely aligned as possible in order to realise this ambition.	
General	TfL	27	Not stated	There is an opportunity to update the AAP to reflect the Healthy Streets approach, in particular taking account of the 10 Healthy Streets indicators.	The Council will seek further discussion with TfL regarding inclusion of the Health Streets Approach.
General	TfL	27	Not stated	<p>Crossrail 2 is beyond the time period of the AAP, however to achieve the growth anticipated in the Upper Lea Valley, it is right that the AAP considers how Crossrail 2 will facilitate growth in the AAP area. TfL is promoting Crossrail 2, however it is likely to require significant private sector funding to deliver it by 2033.</p> <p>The previous AAP figure of 5,000 new homes aligns with the minimum Crossrail 2 do-minimum scenario. With Crossrail 2 10,000 new homes could be built at Meridian Water. The AAP should acknowledge that:</p> <p><u>The introduction of Crossrail 2 could lead to further opportunity for development including sites north of the North Circular beyond the number of homes currently identified in the AAP.</u></p> <p>The AAP needs to be much clearer in explaining the role that Crossrail 2 has to facilitate in facilitating uplift in development since the 2014 AAP.</p> <p>In addition, the AAP should not use the terms Crossrail 2 and 4-tracking interchangeably but should be clear that Crossrail 2 can facilitate more housing growth than just 4-tracking.</p>	<p>The need to see a transformation in public transport infrastructure is recognised in numerous places in the ELAAP including the Vision, Objective 2, paragraphs 1.1.4, 5.3.5 and 5.8.11, and Policy EL7.</p> <p>New housing within the ELAAP is located within Meridian Water and the Plan does not look to beyond this boundary for potential further residential impact from Crossrail 2.</p> <p>The ELAAP establishes levels of housing based on urban design principles; achieving the higher densities will require a step-change in PTAL, but are not dependent on CR2.</p> <p>In most cases the AAP text does not use these terms interchangeably. However, the Council will seek to discuss further with TfL whether and how the text could be clearer.</p>
Multiple locations	NLWA	19	Not stated	There is no reference to the recently granted Development Consent Order (DCO) in the AAP. We believe the DCO takes precedence over local planning policy, so it is important that this is reflected in the AAP in every relevant paragraph.	Comment noted and addressed in further detail below. Also see the Schedule of Minor Amendments items 47, 49 and 54.

Multiple locations	NLWA	19	Not stated	Photographs throughout the document are out of date and should be refreshed. E.g. Meridian Water aerial view on page 21, the view of Ravenside Retail Park on page 52, Angel Road Retail Park on pages 95 and 97 and the photograph of gas holders on page 131.	Comment noted – use of updated images will be sought.
Multiple locations	GLA	27	Not stated	Suggested that all maps in the document include a key, as some currently have none – figures 2.3, 2.4, 8.1, etc. Component parts of the current Meridian Water Masterplan are shown – figures 5.1, 5.2, etc, however it is recommended that the current masterplan is shown in Section 5.2.	Update AAP to include keys for: Figure 2.3, Figure 2.4, Figure 8.1. Figure 10.1. The AAP is not seeking to provide a full masterplan, with the diagrams being largely indicative.
Multiple locations	TfL	27	Not stated	Ponders End Station is too far north.	The Council will update the maps, as set out in the <i>Schedule of Minor Amendments</i> item no.63.
Sustainability Appraisal	LaSalle Investment Management and Aytans MFG Co UK Limited. (Turley)	10a	Unsound	<p>The SA in its current form is unsound, legally flawed and not fit for purpose, for reasons that:</p> <p>a) It has failed to issue a revised scoping report in light of significant material changes to the baseline situation; specifically the consent of the Energy Resource Facility (ERF) at the Edmonton Eco Park in February 2017; and</p> <p>b) No recognition is given in the SA report to the Outline Planning Permission for 46,451 sqm (GIA) of light industrial (B1c), and/or general industrial (B2) and/or storage and distribution (B8) floorspace, at the Stonehill Industrial Estate within the ELAAP area) as a reasonable alternative that would facilitate the intensification and regeneration of existing employment land within the ELAAP area, in line with the Development Plan.</p>	<p>The evidence and context on which the SA Scoping Report was prepared have not changed to a material extent, and the Report remains valid.</p> <p>The outline planning permission granted at Stonehill conforms with the existing use type of the area. Within the context of the Meridian Water development, implementation of this permission would lead to a very limited level of intensification and undermine delivery of this strategic regeneration project. effect.</p>
Sustainability Appraisal	Environment Agency	23	Not stated	The EA provided numerous comments on the ELAAP Sustainability Appraisal	Comments noted.

Meridian Water Spatial Framework	Environment Agency	23	Not stated	The EA provided numerous comments on the Meridian Water Spatial Framework document.	This document provides only an indicative view of how Meridian Water could be developed. The ELAAP document itself provides the policy and guidance against which planning proposals will be assessed.
Transport Review document	TfL	27	Not stated	The evidence appears to be discussing only parking levels rather than overall transport strategy. Query how the required bus movements are calculated as the figures appear fairly arbitrary and do not account for where the demands are too/ from.	The Transport Review is a high-level assessment of the evidence in relation to the transport implications of the AAP. Further detailed studies will be required to support development proposals and masterplans.