

Edmonton Leaside Area Action Plan Examination

Jacqui Glover – Programme Officer

Mobile: 07790 930827

Email: EdmontonLeaside.Examination@enfield.gov.uk

Donatella Cillo
Environment Agency

18th July 2018

Dear Ms Cillo,

Further to the submission of the Edmonton Leaside Area Action Plan (AAP) 2018, on which you submitted formal comments in May 2017. The plan is due to be examined at a formal hearing on the 9th to the 12th of October.

The Inspector appointed to examine the plan has asked me to contact you requesting your attendance at the hearing. Furthermore, whilst recognising that the evidence of the Environment Agency (EA) is not limited to the following matters, and taking into account both parties commitment to continued dialogue, to assist the examination, the Inspector has requested that the EA and the Council prepare a joint Statement of Common Ground (SoCG) outlining the main areas of agreement and dispute in relation to the following matters:

Issue: Whether the preparation of the Plan has complied with the duty to co-operate imposed by S33A of the Planning and Compulsory Purchase Act 2004, as amended. Whether all the other legal requirements of the 2004 Act 9as amended) and the 2012 Regulations have been met.

- i. Is the evidence base in relation to flood risk up to date?
- ii. Are there any important developments/changes since the submission of the Plan?

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

- i. Is the 2013 Strategic Flood Risk Assessment (SFRA) and the recommendations within it a sound basis on which to base the comprehensive redevelopment of the site?
- ii. The Level 2 SFRA recommendation in 4.67 states "that the Sequential Test is to be applied within the site, steering development towards areas of low flood risk but where this is not possible, in making their allocations, the Council will need to be satisfied that the Exception Test can be passed" Is this approach realistic or appropriate for Meridian Water, given the high densities proposed?

- iii. How does this approach accord with guidance in the Framework, para 104 of Framework?
- iv. Does the Plan strategy in relation to flood risk adequately reflect cumulative flood risk and the aim of reducing flood risk?
- v. Does the plan make realistic assumptions about upstream and downstream flood storage?
- vi. Should the Plan to make specific provision for flood risk infrastructure and surface water drainage?
- vii. Should the Plan to make specific provision to address issues relating to land contamination within the plan area, including the potential effects of development in Source Protection Zones (SPZs)?
- vii. Is it necessary for the Plan to make specific provision for flood risk infrastructure and surface water drainage?
- xi. Does the Plan consider fully the potential for waterway movement through the site? Is there a potential conflict with the aims of flood avoidance and biodiversity improvement?

The SoCG should be submitted along with any Hearing Position Statement by Tues 18th Sept 2018.

Should you have any queries for the Inspector regarding the above please contact me on:

Telephone: 020 8379 2099/07790 930827 or by email to:

EdmontonLeeside.Examination@enfield.gov.uk

Yours sincerely,

Jacqui Glover

Programme Officer

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Copy also sent to:

James Gummery, Strategic Planning & Design, Enfield Council