

Proposed Submission Edmonton Leaside Area Action Plan

Consultation Statement

January 2017

PROPOSED SUBMISSION
Edmonton Leaside Area Action Plan

CONSULTATION STATEMENT

**THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING)
(ENGLAND) REGULATIONS 2012**

TABLE OF CONTENTS

1. Introduction	4
2. Proposed Submission Consultation (Regulation 19) (2015)	7
Organisations and individuals consulted	7
Duty to Cooperate	7
How bodies and persons were consulted	8
Summary of main issues and how they were addressed	8
3. Draft Area Action Plan Consultation (Regulation 18) (2012)	17
Summary of main issues and how they were addressed	17
4. Proposed Submission Consultation (2017)	24
 Appendices	
Appendix A: Press Notice	26
Appendix B: Consultation Activity	27
Appendix C: List of Respondents	28
Appendix D: Summary of Consultation Responses Edmonton Leaside Area Action Plan - Proposed Submission Stage January – March 2015	29

1 Introduction

- 1.1 This statement has been prepared to comply with the requirements of Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulation 2012. The statement sets out the consultation process undertaken at the 2014 Proposed Submission Edmonton Leaside Area Action Plan (AAP)¹ (Regulation 19), and provides a summary of the consultation undertaken for the pre-submission stage (Regulation 18). There is coverage of the main issues raised and how these have been addressed by this updated Proposed Submission Edmonton Leaside AAP.
- 1.2 Edmonton Leaside is the largest strategic growth area identified in the Council's Core Strategy (2010) and is located in the south east of the borough. It incorporates the development site at Meridian Water, as well as a number of established employment estates, major infrastructure facilities such as the Edmonton Eco Park and Deephams Sewage Treatment Works, the Lee Valley Regional Park and its facilities at Picketts Lock. Core Strategy policies 37 and 38 provide policy basis for preparing a more detailed area action plan.
- 1.3 The process for producing the Edmonton Leaside AAP began in 2007, and since then there have been several stages of consultation and ongoing discussions to develop the plan with local people and interested organisations, including:
- Joint Issues and Options Report (2008)
 - Discover Central Leaside: Towards a draft Area Action Plan (2012)
 - Proposed Submission Central Leaside Area Action Plan (2014)
- 1.4 The Issues and Options consultation was carried out under the regulations of the Town and Country Planning (Local Development) (England) Regulations 2004, the regulation were subsequently superseded in 2009. On the advice of the then Government Office for London preparation of the Central Leaside AAP was paused to enable the Council to progress its Core Strategy.
- 1.5 Following adoption of the Core Strategy in 2010 work on the Central Leaside AAP recommenced in 2011. The Council produced the 'Discover Central Leaside: Towards a draft Area Action Plan' document to re-engage the community and stakeholders and update on the significant progress made within the area since the previous consultation on the Central Leaside AAP in 2008.
- 1.6 A further round of consultation was undertaken for the 'Discover Central Leaside' document between 12th May and 3rd August 2012 (Regulation 18). A total of 77 separate representations from businesses, public bodies and

¹ It should be noted that the name of the document and AAP area has been amended to 'Edmonton Leaside Area Action Plan', having previously been called the 'Central Leaside Area Action Plan'. The decision was taken at the Local Plan Cabinet Sub Committee of 22nd November 2016 to better reflect the locality.

residents were received for the 'Discover Central Leaside' consultation, and a further 36 for the Meridian Water Masterplan. The comments and representations received during this consultation informed the preparation of the Proposed Submission Central Leaside Area Action Plan (November 2014), and the Proposed Submission Edmonton Leaside AAP (2017).

- 1.7 The Meridian Water Masterplan (2012) further developed plans for this significant part of the Edmonton Leaside AAP area. Consultation took place on the Meridian Water Masterplan in 2010 (Landowner and Stakeholder consultation); 2011 (informal consultation July to September 2011) and May to August 2012 (draft Masterplan consultation jointly with the 'Discover Central Leaside' consultation). The Masterplan was adopted in July 2013.
- 1.8 In 2014 work began on preparing the Proposed Submission Central Leaside AAP, with the document approved by Council on 19th November 2014. The Council published the Proposed Central Leaside Area Action Plan document for public consultation from 5th January to 16th March 2015. In total, 22 submissions were received, and these have informed preparation of this version of the AAP. A summary of these representations and the Council's response are provided in the Consultation Statement.
- 1.9 Following the 2015 consultation, the Council recognised the requirement for the Edmonton Leaside AAP to reflect changing circumstances in Enfield and Meridian Water, including:
 - the award of Housing Zone funding and objectives for an increase in homes,
 - increasing population in the borough,
 - purchase by the Council of significant land parcels in Meridian Water,
 - Crossrail 2 proposals and the commencement of tendering for a master developer
 - an updated evidence base for and review of the AAP
 - adjustment of the spine road (The Causeway) to provide a more appropriate arrangement.
- 1.10 These changing circumstances have required the Council to renew the evidence base. Modelling was therefore undertaken to provide evidence and understanding for the growth potential at Meridian Water. The modelling tested and examined a range of growth scenarios, including at levels of housing and jobs significantly higher than in the Core Strategy, and the results have informed this AAP document.
- 1.11 This AAP therefore consolidates the results of several rounds of consultation and has evaluated many sources of evidence and data to develop the most appropriate options for growth, and, as such, is the culmination of several years of work.

- 1.12 In accordance with regulation 19 of the 2012 Regulations, this Consultation Statement has been produced as part of the Proposed Submission Documents for the Edmonton Leaside Area Action Plan.

2.0 Proposed Submission Consultation (Regulation 19) (2015)

- 2.1 The previous consultation draft of the Edmonton Leaside AAP was approved by Council on 19th November 2014. The Council published the Proposed Central Leaside Area Action Plan document for public consultation from 5th January to 16th March 2015.

Organisations and individuals consulted

- 2.3 In accordance with regulation 19 of the 2012 Regulations, 'specific' and 'general' consultation bodies were consulted on the Proposed Central Leaside AAP, as well as residents and individuals. Specific consultation bodies relevant to the AAP included:

Environment Agency
English Heritage
Canal & River Trust
Natural England
National Grid
London Borough of Waltham Forest
London Borough of Haringey
Thames Water
GLA
TfL
Telecommunication, gas and electricity suppliers.

- 2.4 Consultation bodies are registered on the Council's Local Plan database. General consultees include a range of organisations and individuals. Email notifications of the consultation were sent out, and where necessary, hardcopy notification letters were sent. Approximately 1,500 individuals and organisations were notified, including specific, general and other consultees, internal Council officers and councillors.

Duty to Co-operate

- 2.5 The 2011 Localism Act introduced a 'duty to co-operate' which places a formal duty on local planning authorities to co-operate with other local planning authorities, County Councils and other specified bodies or persons, including statutory agencies.
- 2.6 The boundary of the Area Action Plan immediately borders the London boroughs of Haringey to the south and Waltham Forest to the east. The Council has worked with its neighbours to ensure that the strategic and cross-boundary implications of the Edmonton Leaside AAP have been considered and investigated, and this process has fed into the preparation of the AAP. The Council has ensured that consultation with relevant bodies, including neighbouring authorities, has been continuous throughout the process of preparing the plan and that it meets the requirements of the Duty to Co-operate.

- 2.7 Organisations that are vital to the delivery of the Edmonton Leaside AAP have also been involved throughout its preparation. The Council's partners in the preparation of the AAP include Transport for London, and key private sector organisations.

How Organisations and individuals were consulted

- 2.7 The AAP document was made available online, and paper copies were available at the Council's libraries and at the Civic Centre. The document was published on the Council's website (www.enfield.gov.uk) as a pdf document.
- 2.8 A press notice was published in the Enfield Independent on Wednesday 7th January 2015, a copy of which is shown in Appendix A.
- 2.9 Emails and letters were sent out to all of the specific, general and other consultees on the Local Plan database informing them of the scope of the document, with a link to a copy of the document online and the deadline by which comments had to be submitted. Consultees were also informed of ways of submitting comments.
- 2.10 A list of public consultation events is shown in Appendix B.
- 2.11 Meetings were held with representatives of local community and voluntary groups.

Summary of Main Issues and How They Were Addressed

- 2.12 The main issues arising from the 5th January to 16th March 2015 Regulation 19 consultation, and the Council's response, are set out below.

Main Issue 1: Allocation of the Deephams Sewage Works site as Strategic Industrial Land (SIL) is not sound

- 2.21 The proposed designation of the Deephams STW site as SIL is not adequately justified. The AAP does not recognise that the STW site is wholly owned by Thames Water and that the entire area is defined as Operational Land for the purposes of sewage treatment.

Proposed Submission Response:

The London Plan recognises infrastructure as a suitable use within SIL. The AAP text has been amended to recognise Thames Water as the site owner.

Main Issue 2: Reference to the Lee Valley Heat Network connecting to Deephams Sewage Works is too specific

- 2.22 Deephams STW is self-sufficient in heat requirements and is unlikely to have any significant surplus heat to export. Therefore, it is not certain that Deephams STW will connect to the LVHN.

Proposed Submission Response:

Amendments have been made so that paragraph 12.3.1 no longer references connection to Deephams STW and Policy EL18 on Deephams STW requires a connection to the LVHN only if feasible.

Main Issue 3: References to open spaces and green infrastructure

- 2.23 Sustainable Development could be strengthened further by reference to Green Infrastructure, open space and or biodiversity provision. The Council should look at the fragmentation of open spaces and the linking of them back to paths and other sites. This would provide opportunities to link sites and areas, whilst also offering sustainable transport options through walking and cycling, together with increasing and enhancing the green infrastructure network. This could also help with issues of recreational pressure and disturbance on the SSSI.

Proposed Submission Response:

The ELAAP makes numerous references to the networking of green and blue spaces, and the need to support biodiversity. EL9 requires the provision of sufficient open space within Meridian Wader - including parks and linear spaces, along with habitat to enhance biodiversity. EL12 requires environmental remediation, biodiversity enhancements, and the naturalisation of banks along the Meridian Water watercourses. EL27 requires access to waterfront locations along with protecting and enhancing habitats and biodiversity EL28 supports access across and between existing and new green spaces, developing a network of 'green chains' comprising footpath networks and cycle paths.

Main Issue 4: Further consideration should be given to industrial heritage and the potential for archaeology

- 2.24 The Plan does not appear to utilise opportunities for using the historic environment as basis in which to inform the development of the area and its connection with its surroundings. This absence reinforces concern that heritage issues have not be fully assessed or taken into account. This includes listed buildings and conservation areas, as well as the potential for archaeology and wider historic landscape character that helps define the wider Lee Valley.

Proposed Submission Response:

The ELAAP document now references the rich industrial heritage evident in the form and structures of the waterways themselves, and that Edmonton Leaside lies within an Area of Archaeological Importance, while the Montagu Road Cemeteries Conservation Area is directly adjacent to the west of the AAP boundary (paragraphs 2.1.5 and 2.1.6.) Policy EL12 requires proposals to demonstrate an understanding of the industrial heritage and archaeology of the area.

Main Issue 5: Remove the reference for a footpath across the EcoPark site.

- 2.25 Figure 11.1 shows a proposed footpath crossing the southern part of the EcoPark site and paragraph 11.4.16 refers to a new pedestrian and cycle bridge over Salmon's Brook to connect Edmonton EcoPark to the links to the west. The path would cut across the entrance used by waste vehicles using the EcoPark site, giving rise to significant safety concerns.

Proposed Submission Response:

The revised ELAAP document has remove this proposed route and the text references to it.

Main Issue 6: Inconsistent reference to job numbers

- 2.26 Reference to 3,000 new jobs in Meridian Water is not consistent with Core Policies 37 and 38, both of which allocate 1,500 new jobs to Meridian Water. Also, it is inconsistent with other references in the draft AAP which refer to 3,000 new jobs across the whole AAP area. No justification of why the jobs target may have been changed or how, if 3,000 does apply to Meridian Water only, this is achievable and how it relates to the land allocations. Target employment densities within the SIL areas will need to be reflective of the types of uses that are supported in these designations and the employment densities that are reasonable for these uses.

Proposed Submission Response:

The revised ELAAP establishes a comprehensive approach to regeneration at Meridian Water, which optimises land use and seeks over 6,000 new jobs. The case for this is set out most clearly in Section 5.4 Economy and Employment, and policy EL2. Restrictive industrial land designations are being removed to enable a flexible approach to workspaces and jobs creation.

The increase in job numbers from the Core Strategy reflects the changes which have taken place since this document was adopted in 2010. These include a rising borough population and greater quantum of housing at Meridian Water increasing the requirement for more jobs. Worsening deprivation in the east of the borough can in part be addressed by a higher number and a better quality of jobs.

Main Issue 7: The character of the Causeway route must be appropriate to the land uses through which it runs

- 2.27 The Causeway route runs through the centre of land designated as SIL. The design aspirations described it are not consistent with the role and function and acceptable uses within SIL, as set out in Paragraph 2.79 of the London Plan – in particular, the requirements for attractiveness, public spaces, squares, shopping centres and priority for pedestrians and cyclists. Suggest including details stating that the route should not compromise the SIL designation.

Proposed Submission Response:

The revised ELAAP establishes a comprehensive approach to regeneration at Meridian Water which optimises land use. Restrictive industrial land designations (SIL) are being removed to enable a flexible approach to regenerating the entire site. The uses along the Causeway can therefore be appropriate to the location and achieve a high quality of public realm while optimising use types.

Main Issue 8: The safeguarding of the Causeway route shown is not justified

- 2.28 The safeguarding of the specific Causeway route not justified. No discussion of alternatives is considered, either in the Submission AAP or Sustainability Appraisal. There is no evidence to show that alternatives have been considered and that consideration demonstrates that they are less appropriate.

Proposed Submission Response:

The revised ELAAP establishes a Causeway route based upon carefully prepared evidence, as set out in Section 5.8 of the AAP. The Causeway is vital to connecting Meridian Water as a coherent entity, and enabling connectivity with the wider area. It is therefore essential to the viability of the Meridian Water regeneration.

Main Issue 9: Policy does not state that the route is required to be used by buses

- 2.29 The draft policy does not state that the route is required to be used by buses, with a lack of consistency between the AAP and the Meridian Water masterplan.

Proposed Submission Response:

The revised ELAAP provides a clear policy position in EL6 that the Causeway should be accessible by vehicular traffic between Glover Drive in the west and Harbet Road in the east.

Main Issue 10: Allocation of new homes is not justified by evidence

- 2.30 The allocation of 1,100 -1,200 new homes in 'Meridian East' is not justified by evidence and is not consistent with London Plan policy. The area is designated as SIL and the introduction of adjacent uses should not compromise integrity of effectiveness of designated industrial land (London Plan Policy 2.17).

Proposed Submission Response:

The increased and growing need for housing in London and Enfield is well evidenced. The revised ELAAP removes restrictive industrial land designations (SIL) to enable a flexible approach to regenerating the entire site. As demonstrated by the evidence base, to achieve the quantum of

development within the Meridian Water boundary requires removal of the SIL designation and significant delivery of residential units to the east of the River Lee Navigation.

Main Issue 11: Requirement for higher densities is not justified

- 2.31 The requirement for higher densities than London Plan has not been justified as the Submission AAP is not supported by evidence that demonstrates that the required level of housing is deliverable alongside the other land uses (existing and SIL) in this location. It is not consistent with Policy 2.17 of London Plan – that adjacent uses should not compromise integrity of effectiveness of designated industrial land.

Proposed Submission Response:

London Plan policy 2.13 'Opportunity Area and Intensification Areas', which covers Edmonton Leaside seeks to optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth, and, where appropriate, contain a mix of uses. Furthermore, the revised ELAAP removes restrictive the SIL designations to support regeneration across the entire site. Mixed use types will be enabled to operate effectively within the area.

Main Issue 12: Changes to the SIL boundary are not justified

- 2.32 Changes to the SIL boundary are not justified and not the most appropriate strategy. The evidence base does not support the loss of SIL, or the re-designation from PIL to IBP. The de-designation of 4.5 hectares of SIL is not supported by evidence, and facilitating housing delivery does not justify such a loss. SIL designations should be made on the basis of an assessment of strategic and local supply and demand (London Plan 2.83 and Policy 4.4).

Proposed Submission Response:

The revised ELAAP removes all restrictive industrial land designations (SIL) within the Meridian Water boundary to enable a flexible approach to regenerating the entire site. The AAP establishes a comprehensive approach to regeneration which optimises land use. The case for this is set out in Section 5.4 Economy and Employment, and policy EL2. Restrictive industrial land designations are being removed to enable a flexible approach to workspaces and jobs creation. The approach of mixed land uses is also required to meet the level of growth in housing and supporting services. As such the position of the AAP has moved on significantly. The evidence base establishes both the need and opportunity to locate a range of high-value adding growth sectors which will support the economy and generate greater levels of employment.

Main Issue 13: Job figure should be based on evidence of demand

- 2.33 The re-designation of SIL is led by job target, not by evidence that there is demand for these types of uses and there is a lack of evidence to suggest that

market trends and demands can lead to assumed uplift in job creation to 3,134 jobs.

Proposed Submission Response:

The evidence base prepared for the revised ELAAP support Meridian Water achieving over 6,000 new jobs. In the wider AAP area, the ELAAP supports an increase in jobs, driven by redevelopment and intensification of the area's industrial estates, including at the Council-owned Claverings and Montague Industrial Estates where investment can improve outdated infrastructure.

Main Issue 14: SIL release is not provided like-for-like

- 2.34 The Submission AAP identifies 4.5ha of Harbet Road SIL release and new SIL PIL identification to re-provide this released land. The released SIL land is not re-provided like for like. Its division into two separate land parcels means that it is not providing the type of land required to match the demand and the uses provided on the 4.5ha SIL section. It does not align with guidance in the Land for Industry and Transport SPG (2012), which highlights the fundamental strength of SIL as its scale and critical mass.
- 2.35 The two new SIL sites do not provide a scale or configuration of land that allows for the full range of SIL uses to be delivered. As narrow strips they limit the type of buildings that can be accommodated to a scale much lower than the Harbet Road area can currently accommodate. Furthermore, the largest single SIL addition lies within the Deephams Water Treatment Works site and it is questionable how 'available' this land really is to other occupiers.

Proposed Submission Response:

The revised ELAAP removes all restrictive industrial land designations (SIL) within the Meridian Water boundary to enable a flexible approach to regenerating the entire site. The evidence base establishes both the need and opportunity to locate a range of high-value adding growth sectors which will support the economy and generate greater levels of employment. This approach is set out in Section 5.4 and policy EL2 of the ELAAP. The de-designation of industrial land within Meridian Water is therefore not dependent on re-providing elsewhere.

The northwards extension of SIL will provide a natural extension to the existing block of SIL which covers industrial estates to the south, providing a good basis for the future management and sustainability of the designated areas. The inclusion of Deephams STW is valid under the London Plan (section 2.79) as a utility. The ELAAP does not expect other industrial uses on the Deephams STW site.

Main Issue 15: Proposal to implement 'Central Square' would have a significant impact on access and servicing of Ikea Store

- 2.36 The proposed public squares as described in the AAP would have a significant detrimental impact on the access and servicing of the Ikea store and seem to suggest that the main vehicular access to the store car park is to be relocated

to the south (rear) of the site, to Leaside Road, along with the access to the service yard. Altogether, this would have a series of negative effects on the Store's operation.

Proposed Submission Response:

The revised ELAAP provides for town centre uses and public realm along the Causeway; it does not include the public squares of the 2013 Meridian Water Masterplan. The evidence modelling work which tested the quantum of development at Meridian Water assumes a reconfiguration of parking at the existing retail stores - including for Ikea. The AAP provides the defined Causeway route. Other more detailed connectivity plans are indicative only.

Main Issue 16: Highway capacity

- 2.37 The Causeway phase 2 section shows a single carriageway road with dedicated footway / cycleway and one lane per direction of traffic, which will reduce the traffic flow capacity of the existing western section of Glover Road, potentially causing significant delays for customer traffic wishing to access the Ikea store car park.

Proposed Submission Response:

The ELAAP supports improved access which is vital to the successful delivery of Meridian Water and the wider area, including of the road network. Policy EL10 Urban Grain requires development proposals to 'respond to the need for comprehensive, integrated regeneration across the whole of Meridian Water and the surrounding area' and develop a hierarchy-based network of streets. The revised ELAAP shows the detailed Causeway plan at Figure 5.1, providing for a 32m wide corridor in the westerly segments 1 and 2. Policy EL6 allows for vehicular movements along the Causeway. The support for developing a comprehensive road network design is set out in policy EL25. This policy requires that 'the arrangement of streets and places within Meridian Water should be guided by an urban design approach which incorporates sufficient capacity to meet demand'.

Main Issue 17: Parking

- 2.38 The existing car parking at the Ikea store operates nearly at capacity during the busiest trading periods and additional parking spaces would be needed in the future for the car park to operate within capacity. However, the current preferred 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.

Proposed Submission Response:

The evidence modelling work which tested the quantum of development at Meridian Water assumes a reconfiguration of parking at the existing retail stores – including at Ikea. Further detailed work will be required for masterplans and development proposals to establish appropriate parking and access.

Main Issue 18: Visibility of Store

- 2.39 An essential part of the IKEA concept is that customers approach the Store from the front so as to identify the store entrance clearly. The store currently benefits from generally good visibility from every approach/access route. However, the Masterplan proposals show a number of buildings and public squares to be delivered surrounding the store site, which would obstruct store visibility from various aspects.

Proposed Submission Response:

The evidence modelling work which tested the quantum of development at Meridian Water indicates relatively high densities and a building height average of 7-8 storeys. The configuration of urban form across Meridian Water will be established through more detailed masterplans and development proposals. Policy EL11 provides the approach to tall buildings while EL10 addresses urban grain.

Main Issue 19: The AAP is in insufficiently flexible

- 2.40 The AAP may be expressed too prescriptively - whilst detail and clarity can be useful, it is very important that the AAP does not impose a rigid blueprint on the area which may become outdated or which may prove not to be viable when it is worked up in detail. The viability work undertaken by the Council to date does not yet provide a sufficiently robust basis to understand the true costs of delivering the opportunity. The site carries a substantial infrastructure burden and it is critical that new development can be consented which is sufficiently valuable to meet those costs. There is recognition at both strategic (OAPF) and local policy (Core Strategy) of the need for flexibility and to adopt a holistic approach to the future use of industrial land. The AAP should not prescribe detailed outcomes or limitations in relation to the scale of residential and other development that can be supported within Meridian Water. The AAP should make clear that the 2,000 sqm town centre figure is indicative and does not represent the maximum level of floorspace that can be provided, subject to the relevant retail policy tests being addressed.

Proposed Submission Response:

The revised ELAAP is based upon a comprehensive range of evidence. The policies have been prepared so as to support and guide development while retaining flexibility.

The ELAAP approach is to provide a far more flexible approach to providing employment space and jobs, with section 5.2 and policy EL2 in particular establishing the removal of the SIL designation and the development of mixed-use areas. In terms of housing, Policy EL1 includes a stated potential for 10,000 new homes, subject to mix and tenure, sufficient supporting infrastructure, the de-designation of industrial land and the achievement of high quality urban design. The ELAAP approach to the new town Centre at Meridian Water is to provide primarily for local need, while the floorspace

must be in proportion to the level of residential development (Section 5.5 and EL3).

Main Issue 20: Combination of land uses to the east of the River Lee Navigation

- 2.41 The aim to introduce more attractive uses and activity along the River Lee Navigation is supported, as is the intention for the PIL to be of high quality and well designed; however the boundaries of the PIL, the residential area, and the live/work uses should be reconsidered to avoid any environmental impacts such as noise, dust, odour, and vehicle movements that could negatively impact residential uses. It is recommended that smaller high quality commercial uses should be promoted along the waterside in the non-residential areas.

Proposed Submission Response:

The position of the AAP has evolved since this comment was received. The evidence-base modelling which informs the revised ELAAP shows that to achieve higher levels of development requires the Harbet Road industrial site to become a mixed-uses area. The AAP therefore de-designates all of the existing SIL at this location. Ensuring the River Lee Navigation is a focal point for community and commercial activity, while achieving high quality design, is supported by several policies including EL3, EL10, EL12 and EL27.

3.0 Draft Area Action Plan Consultation (Regulation 18) (2012)

- 3.1 The Council published the “Discover Central Leaside: Towards a draft Area Action Plan’ document for public consultation for 12 weeks between May and August 2012.
- 3.2 The aim of the consultation was to publicise the document and to re-engage the community and stakeholders following the pause in 2008/9, and to re-establish and confirm the key planning issues for the area.
- 3.3 In accordance with regulation 18 of the 2012 Regulations, ‘specific’ and ‘general’ consultation bodies were consulted on the draft Central Leaside AAP, as well as residents and individuals.
- 3.4 For the Regulation 18 consultation the AAP document was made available online, and paper copies were available at the Council’s libraries and at the Civic Centre. The document was published on the Council’s website (www.enfield.gov.uk).
- 3.5 Emails and letters were sent to all of the specific, general and other consultees on the Local Plan database informing them of the scope of the document, with a link to a copy of the document online and the deadline by which comments had to be submitted. Consultees were also informed of ways of submitting comments which included online consultation methods.
- 3.6 The plan was taken to a number of public consultation events and meetings were held with representatives of local community and voluntary groups.
- 3.7 A press notice was published in the Enfield Independent and an article was published in the ‘Our Enfield’ magazine which is distributed to all households in the borough.
- 3.8 In total 74 responses were received at the Regulation 18 stage of consultation.
- 3.9 To view further detail on the Regulation 18 consultation, the responses received, the main issues raised and the Council’s response, refer to the Consultation Statement published in 2015, available at the following location: <https://new.enfield.gov.uk/services/planning/planning-policy/area-action-plans/>
- 3.10 Due to the stages of preparation for the ELAAP involving a previous Regulation 19 consultation, the main issues raised on the 2012 draft AAP document are also set out below - as they were in the Consultation Statement accompanying the 2014 Proposed Submission AAP version – however the responses have been reappraised to show how this 2017 Proposed Submission ELAAP responds to the issues raised in the 2012 consultation.

Summary of Main Issues and How They Were Addressed

Main Issue 1: Allocation of Strategic Industrial Locations (SIL)

- 3.11 Concern was raised that the re-allocation of Strategic Industrial Locations (SIL) land to smaller pockets of SIL within the Meridian Water area is inconsistent

with the Core Strategy Proposals Map, and that it is not appropriate to seek revised allocations in a manner inconsistent with the adopted wider policy framework, with these sites being too small and having inadequate access arrangements. The re-allocation of these brownfield sites for SIL purposes will lead to them lying vacant, stymying the regeneration of these parts of Meridian Water. These newly proposed SIL areas should be removed as they are a token gesture to ensure that no SIL land is lost, whilst in reality this is what will be happening.

Proposed Submission Response:

The revised ELAAP removes all restrictive industrial land designations (SIL) within the Meridian Water boundary to enable a flexible approach to regenerating the entire site. The AAP establishes a comprehensive approach to regeneration which optimises land use. The case for this is set out in Section 5.4 Economy and Employment, and policy EL2. Restrictive industrial land designations are being removed to enable a flexible approach to workspaces and jobs creation. The approach of mixed land uses is also required to meet the level of growth in housing and supporting services. As such the position of the AAP has moved on significantly. The evidence base establishes both the need and opportunity to locate a range of high-value adding growth sectors which will support the economy and generate greater levels of employment.

Main Issue 2: Early Development Phase at Harbet Road

- 3.12 The potential scope for an early development phase at Harbet Road Industrial Estate was raised, which responds to the current constraints of the site, but would allow for the future redevelopment consistent with the Masterplan vision.

Proposed Submission Response:

The updated approach in the Proposed Submission AAP is for a comprehensive regeneration which will see the existing Harbet Road estate be removed from SIL designation and brought forward as a mixed use development area.

Main Issue 3: Size of Business Units

- 3.13 The draft AAP suggests that industrial uses and flexible space for small businesses will be promoted to provide a suitable transition between the more intensively used industrial areas and the emerging residential neighbourhood at Meridian Water. Concern was raised that such space should be sufficient flexibility to allow for large and medium sized industrial uses on all parts of Harbet Road Industrial Estate to allow response to market demand.

Proposed Submission Response:

The comprehensive regeneration which will see the existing Harbet Road estate be removed from SIL designation and brought forward as a mixed use development area means that there will be flexibility in business units size and use across the area, provided there is compatibility with other uses such as residential.

Main Issue 4: Business Types

- 3.14 Restriction of uses to B1 on the SIL at Harbet Road Industrial Estate was contested, stating there should be sufficient flexibility for permitted uses to include B1, B2 and B8. Other employment generating uses such as hotel, leisure and retail should be considered appropriate, particularly within the northern part of the estate. Proposals to bring forward the Harbet Road Industrial Estate for development as a mixed use commercial scheme in the short to medium term should be included in the forthcoming AAP.

Proposed Submission Response:

The comprehensive regeneration which will see the existing Harbet Road estate be removed from SIL designation and brought forward as a mixed use development area means that there will be flexibility in business use type across the area. The removal of the SIL designation does not preclude 'B' uses, provided there is compatibility with other uses such as residential.

Main Issue 5: Residential Uses

- 3.15 It was suggested that the release of SIL land within the Harbet Road Industrial Estate for residential uses has a limited prospect of residential developer interest, due to its incompatible relationship with the remainder of the predominately industrial uses on the site. Any development alongside the canal needs to relate effectively with the proposed residential sites to the west of the canal and it was proposed that an appropriately designed, employment-led scheme would achieve this.

Proposed Submission Response:

The comprehensive regeneration which will see the existing Harbet Road estate be removed from SIL designation and brought forward as a mixed use development area means that the design and planning approach can be such that residential development will be desirable. The ELAAP provides extensive policy support to appropriate high quality development along the River Lee Navigation, including commercial, residential and leisure.

Main Issue 6: Green Belt Designation

- 3.16 Comments were received regarding the land to the east of the Harbet Road Industrial Estate, which is designated as Green Belt. It was suggested that over a long period this land has been used for car storage, car park, skip storage and waste recycling uses, and the AAP should realign the Green Belt boundary to reflect this position and acknowledge that the site is currently brownfield rather than open or utilised green space.

Proposed Submission Response:

The existing uses of this area are not in themselves justification to remove the green belt designation. Any proposals for this site will be considered in the context of the relevant policies in the London Plan and Enfield's Local Plan, in particular Development Management Document (DMD) policy 82.

Main Issue 7: East West Transport Connections

- 3.17 The facilitation of the proposals to provide a new east-west connection through Meridian Water, including the Harbet Road Industrial Estate, should not be to the detriment of a development scheme's viability.

Proposed Submission Response:

The east-west connection, known as the Causeway, is a key part of the overall Meridian Water regeneration and development proposals must be considered within this context. The route set out in the Proposed Submission ELAAP is based upon an assessment of constraints, opportunities and urban design principles.

Main Issue 8: Improved Pedestrian and Cycle Connections

- 3.18 Comments were received stating that the AAP should highlight the importance of establishing better pedestrian connections from the towpath into the Picketts Lock complex via a new pedestrian and cycle bridge. There is support for the principles for improved connectivity, both north-south and east-west for pedestrians and cyclists. Inclusion of cycle facilities is recommended as an integral part of the new residential development, and also at retail sites and at open spaces.

Proposed Submission Response:

Better pedestrian and cycle connections are a key part of the Proposed Submission ELAAP. A route is proposed (see Figure 11.1 of the ELAAP) which links east west and goes around Picketts Lock, linking over the waterway to the east and the railway to the west. By utilising the existing canal crossing at Picketts Lock the viability of a scheme coming forward along this route will be significantly enhanced.

Main Issue 9: Road Traffic

- 3.19 Concern was raised that the AAP does not identify where the main development traffic impact will be, and how these matters should be addressed, while there is a lack of recognition that development will worsen traffic conditions on the local and strategic highway network. A more balanced approach to transport planning is suggested to reduce an over-reliance upon non-car mode and public transport, and recognise that development within this area will generate significant travel demand by car.

Proposed Submission Response:

Movement and transport in and around Meridian Water will be based upon a range of transport modes, including rail, bus, pedestrian and cycle. The increase in PTAL values, through improvements to rail and bus service, will support the density of housing expected for Meridian Water. As development proposals come forward a transport impact assessment will be carried out.

Main Issue 10: Impact of Potential Waterbus/ Taxi Service

- 3.20 Concern was raised over the provision of waterbus/water taxis in this area due to the potential for an increase in waste and impact on water quality.

Proposed Submission Response:

Policy EL24 on the use of the waterways for transportation establishes that the Council will support opportunities for water-borne traffic where suitable. Any proposal must be considered through consultation with the relevant statutory organisations.

Main Issue 11: Town Centres Definition

- 3.21 Concern was raised regarding the appropriate level of town centre uses including retail, leisure, restaurants, community facilities, etc, to create an exciting and attractive centre. A quantum of no more than 2,000 sqm of class A1 to A5 uses is too small to create a thriving new centre. Consideration needs to be given to the definition of the local centre with reference to the existing Tesco and Ikea stores. The definition should exclude these out of centre stores in order to control the amount of floorspace in this location.

Proposed Submission Response:

The Proposed Submission ELAAP requires that development proposals for A-Class uses at Meridian Water which, cumulatively with existing and extant planning permissions lead to provision greater than 2,000 square metres must demonstrate evidence that there would be no adverse effect on neighbouring centres and is in proportion to the growth in local demand. The new town centre is expected to provide primarily for the local needs of Meridian Water, with potential to develop a café and restaurant culture.

Main Issue 12: Community infrastructure

- 3.22 Concern was expressed that provision of additional places of worship in order to meet the future needs of the community, as a result of new homes, are not properly met.

Proposed Submission Response:

The Proposed Submission ELAAP policy EL5 addresses the provision of community facilities at Meridian Water. There is a need to cater for the needs of both the new and existing communities, with a preference for co-location and multifunctional uses so that they can accommodate a variety of different uses. The requirement for such uses must be proportional to the level of residential development being proposed.

Main Issue 13: Lee Valley Heat Network

- 3.23 Concern was expressed over the principle of creating a low carbon future via a new decentralised energy network due to the likely costs associated with the scheme and whether the scheme would have benefits to the community. Locating the energy generation hub at Edmonton EcoPark was not supported, and there is a lack of any high heat density users to support the establishment of such a decentralised energy network.

Proposed Submission Response:

Large scale decentralised energy networks offer an affordable way of achieving low carbon energy supply in densely populated urban areas, meeting domestic, commercial and some industrial space heating and domestic hot water requirements. The Council is working with partners on the development of the Lee Valley Heat Network which will capture low carbon heat and supply it to buildings and industry across the Lee Valley, including those in Enfield, and will deliver significant economic, environmental and social benefits including protecting against future price rises and addressing fuel poverty.

Main Issue 14: Contributions

- 3.24 It was noted that the vision relies on the delivery of significant infrastructure projects such as new bridges, station improvements and public realm improvements, but that these should be sought in proportion to the scale and type of development proposed, taking into account scheme viability. It was noted that the Harbet Road Industrial Estate is a site with many challenging constraints and therefore redevelopment will be costly, and should not be impeded by excessive infrastructure contributions.

Proposed Submission Response:

Funding for infrastructure at Meridian Water will, in part, be secured by the collection of contributions via the planning system. Enfield's Community Infrastructure Levy (CIL) (2016) charges at a zero rate for residential developments at Meridian Water e, due to economic viability grounds arising from high abnormal site and supporting infrastructure costs. The Regulation 123 list directs CIL receipts to supporting the Causeway and the new railway station. Policy EL13 sets out the approach to S106 contributions for development proposals at Meridian Water.

Main Issue 15: Heritage

- 3.25 There is concern that draft AAP does not identify any heritage, or provide any indication of how the historic environment is expected to be improved or utilised in future developments, contrary to section 12 of the NPPF. Concern is also expressed that the draft AAP does not recognise the need for development to respond positively to the local character and historical context.

Proposed Submission Response:

The ELAAP document now references the rich industrial heritage evident in the form and structures of the waterways themselves, and that Edmonton Leaside lies within an Area of Archaeological Importance, while the Montagu Road Cemeteries Conservation Area is directly adjacent to the west of the AAP boundary (paragraphs 2.1.5 and 2.1.6.) Policy EL12 requires proposals to demonstrate an understanding of the industrial heritage and archaeology of the area.

Main Issue 16: Tall Buildings

- 3.26 There is concern that the draft AAP is not clear how the Council's approach to managing tall buildings will be implemented and questions whether the area will encourage the development of tall buildings as a mechanism of delivering regeneration.

Proposed Submission Response:

The evidence for the Proposed Submission ELAAP shows that to achieve the levels of development expected at Meridian Water the average building height will be 7-8 storeys, with tall buildings (usually defined as over 10 storeys) being part of the design solution. Policy EL11, Part C, sets out specific criteria for managing the development of tall buildings at Meridian Water. Tall building policy DMD 43 will also be applicable.

4.0 Proposed Submission Consultation 2017

- 4.1 The Edmonton Leaside Area Action Plan is formally published for a six week public consultation period between **Wednesday 15th March and Friday 28th April 2017**. The AAP and all of its supporting documentation will be available at the Council's website: www.enfield.gov.uk. Printed copies of the AAP are available to view in the borough's main libraries and the Civic Centre.
- 4.2 The Council proposes to submit the Area Action Plan to the Secretary of State for independent examination under Section 20 of the Planning and Compulsory Purchase Act 2004, along with the required supporting documents. Prior to this, in accordance with Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012 the Council is inviting representations to be made to consider whether the Plan is legally compliant and sound. Any representations made will be submitted with the Central Leaside Area Action Plan and considered by an independent Planning Inspector.
- 4.3 A public notice has been placed in a local paper with a borough-wide circulation, The Enfield Independent.
- 4.4 You can submit your comments to:

Regeneration and Environment Department,
Planning Policy Team
Civic Centre,
Silver Street,
Enfield
EN1 3XA
Tel: 020 8379 3866 Fax: 020 8379 3887

or email: localplan@enfield.gov.uk

Appendices

Appendix A: Press notice

Enfield Independent January 2015

Public Notices

LONDON BOROUGH OF ENFIELD
Town & Country Planning Act 1990
Town & Country Planning (Conservation) (England) Regulations 2009
Town & Country Planning (General Development Procedure) (Amendment) (England) Order 2010
The Planning (Listed Buildings & Conservation Areas) Act 1980
Town & Country Planning (Appeals) (Written Representations Procedure) (England) Regulations 2009
 To view the following applications and documents go to the planning online register at:
<http://planningandbuildingcontrol.enfield.gov.uk/online-applications/>

PROPOSAL: Demolition of existing vacant warehouse and erection of a 3-storey block of 12 self-contained flats.
AT: 2A And 2B Park Avenue, London, N16 2JH
REF: 14/04837/FUL

CONSERVATION AREA: SOUTHWATE GREEN
PROPOSAL: Part single, part first floor rear extension, alterations to the roof incorporating an enlarged loft room including demolition and erection of outbuilding.
AT: The Elm, 11 Canine Hill, London N16 7DU
REF: 14/04837/HOU**

CONSERVATION AREA: SOUTHWATE GREEN
PROPOSAL: Single storey detached building at site and rear involving demolition of existing detached outbuilding at site.
AT: 24 Lilworth Court, 13 Canine Hill, London N16 7DU
REF: 14/04837/HOU**

CONSERVATION AREA: THE LAKES ESTATE
PROPOSAL: Installation of windows to front elevation at ground and 1st floor level.
AT: 21 Old Park Road, London N13 6RG
REF: 14/04837/HOU**

Development affected by a Deprivation from the Local Development Plan, for the following reasons due to the width and height of the house the proposal would represent a significant addition within the Green Belt and potential harm to the open and rural character contrary to policies DM015 of the development management document, core policy 32 of the core strategy and policy 7.16 of the Leaside plan.

PROPOSAL: Erection of palisade fence to a maximum height of 2.5m (RETROSPECTIVE).
AT: Public Open Space, George Lavel Drive, Enfield EN3 6WA
REF: 14/04837/FUL*

Any person who wishes to make representation to the Council regarding the application(s) should do so within 14 days of the date of the Notice using the planning online register. Guidance on how to use the online register is available at www.enfield.gov.uk using the Search For Applications button. The Local Government Access to Information Act 1998 requires that any observations on this proposal must be made available, on request, to the press and the public (including the applicant) who may take copies, if they so wish. Copies of observations may be published on the Council and the Planning Inspectorate websites, including any personal information provided.

** If a householder, advertisement consent or minor commercial application becomes the subject of an appeal, dealt with by written representations, appeal refusal or planning permission, there may be no opportunity under the fast track appeal process to make further comment at the appeal stage. Comments received at the application stage will be forwarded to the Planning Inspectorate.

Dated: 07/01/15

ENFIELD Council
www.enfield.gov.uk

Public Notices

LONDON BOROUGH OF ENFIELD
PLANNING AND COMPULSORY PURCHASE ACT 2004
(AS AMENDED)
Regulations 19 and 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012
NOTICE OF PUBLICATION OF THE PROPOSED SUBMISSION DRAFT CENTRAL LEASIDE AREA ACTION PLAN (2014)
FOR PUBLIC CONSULTATION

Notice is hereby given that Enfield Council has published its Proposed Submission Central Leaside Area Action Plan for consultation from **Monday 5th January to 5.00pm Monday 16th February 2015**. The Central Leaside Area Action Plan will form part of Enfield's Local Plan.

The Central Leaside Area Action Plan covers an area in the south east of the borough which stretches from Enfield's border with Haringey at the south to Picketts Lock at the north. It includes regeneration area of Meridon Water, residential areas along Montagu Road, Edmonton EcoPark, Deepham Sewage Treatment Works, Picketts Lock, and several industrial estates.

The Central Leaside Area Action Plan sets out a planning framework to deliver new housing, jobs and community facilities. It identifies specific sites for development and new infrastructure that will be needed to support future growth.

The Proposed Submission Central Leaside Area Action Plan and supporting documentation are available to view online at <http://www.enfield.gov.uk/centralleasidearea>, or as hard copies at the Civic Centre, Silver Street, Enfield, EN1 3XA (Main Reception, Monday - Friday 8.30am - 5.00pm), and at the following libraries:

	Mon	Tues	Weds	Thurs	Fri	Sat
Fore Street	9.30-7	9.30-5	1-7	Closed	8.30-5	9.30-5
Edmonton Green	9-7	9-7	9-7	9-7	9-5.30	9-5
Enfield Town	9.30-8	9.30-8	8.30-5.30	9.30-8	8.30-5.30	9.30-5.30
Milfield House	8.30-8.30	8.30-8.30	8.30-8.30	8.30-8.30	8.30-8.30	8.30-8.30
Picketts Lock	Closed	9-7	9-7	Closed	9-5	9-5

Enfield Town Library is open Sundays 12pm - 4pm
 Milfield House Library is also open Sundays 8.30am-5.30pm.

Comments can be emailed to: localplan@enfield.gov.uk
 Or sent to: Planning Policy Team, Enfield Council, Civic Centre
 Silver Street, Enfield, EN1 3XE

Any comments must be received by **5.00pm Monday 16th February 2015**. Comments received on the Proposed Submission Central Leaside Area Action Plan will be submitted to the Government for consideration as part of the examination in public.

For further information please contact the Planning Policy Team on 0208 379 3886

www.enfield.gov.uk

ENFIELD Council

Jobs enfieldindependent.co.uk/jobs

careerbuilder.co.uk

enfieldindependent.co.uk/jobs

Call: 01444 755099 To advertise call 0844 495146 Email: jobs@enfieldindependent.co.uk

Call us for this free IT tools made at the showings/panels.

BAR STAFF
VACANCIES
 We are looking for new staff to add to our team at **THE SOUTHGATE CLUB**. Previous experience would be useful but not essential. Good pay. If you are interested in applying please email your CV to info@southgateclub.com

Part Time
FAST TIME RECEPTIONIST
 Monday 9.30-12.30pm, Wednesday 4.30-7.30pm. Friday 12.30-4.30pm. Must be flexible. 300 8904 2801

Something to sell?
 Please call 01923 216216

Beanstalk
 CAN YOU INSPIRE A CHILD TO READ?
 Many rewarding opportunities for volunteers needed for local primary schools, 17.5 hours twice a week for a minimum of one year; training and support given, travel expenses paid. CONTACT Harriet Watson 020 8147 3995 or visit www.beanstalkcharity.org.uk

Take away
 Looking for a tasty takeaway, try our eating out section.

Sell your car FAST
 An advert this size (3x2) with photo **ONLY £20 FOR 8 WEEKS!!**
 An advert this size (3x1) **ONLY £16 FOR 8 WEEKS!!**
 Your advert will appear in the Enfield Independent and Haringey Independent and on our websites including EastangelsMart

Time for a new car?

NAME _____ TEL _____
 ADDRESS _____
 WORKING: Please indicate size required ☐ With Photo £20 ☐ Text only £16

Appendix B: Consultation Activity

Date		Event	Location	Time
2015				
Monday	12 th Jan	Public consultation event	Tesco Lea Valley Extra Store	9am-5pm
Tuesday	13 th Jan	South East Enfield Partnership Meeting	Green Towers, Edmonton	7-9pm
Tuesday	20 th Jan	Public drop-in	Civic Centre	10am-1pm
Tuesday	20 th Jan	Edmonton Neighbourhood Panel	Green Towers, Edmonton	6.30-8.30pm
Friday	30 th Jan	Public consultation event	Edmonton Green and Fore Street libraries	9am-4pm
Thursday	5 th Mar	Presentation to the Housing Strategic Partnership	Civic Centre	-

Appendix C: List of respondents

1. Marine Management Organisation
2. Individual
3. AMEC On Behalf Of National Grid
4. Office of Rail Regulation
5. Highways Agency
6. Lee Valley Regional Park Authority (LVRPA)
7. Enfield Lock Conservation Group
8. Transport for London (TFL)
9. Epping Forest Council
10. Environment Agency
11. Thames Water Utilities Ltd
12. Natural England
13. English Heritage
14. North London Waste Authority (NLWA)
15. Canal & River Trust
16. GVA on behalf of LaSalle Investment Management
17. IKEA
18. QUOD
19. NHS Enfield Clinical Commissioning Group
20. Greater London Authority (GLA)
21. Lee Valley Leisure Trust
22. London Waterway Partnership

Appendix D: Summary of Consultation Responses to the Proposed Submission Edmonton Leaside Action Plan – January 2015 to March 2015

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
01	A	Marine Management Organisation - Angela Gemmill	NA	NA	No comment on the consultation	No further action required.
02	A	Individual - Philip Ridley			<p>Broadly supportive of the aims of the AAP, but objects to it for not including the Ponders End AAP area.</p> <p>Concerned about the Crossrail 2 plans in light of a potentially fragmented approach. Whilst STAR services from Stratford to Angel Road are a great step forward, it is a disappointment to not see the proposed STAR rail link being run as a TFL Concession. TFL's existing London Overground, DLR or Jubilee Line services terminating at Stratford could continue up the Lea Valley, providing better links.</p> <p>The new STAR service can be used as an opportunity to divert</p>	<p>The AAP areas are justified and supported by the Core Policy. Boundary amendments are not required.</p> <p>The Council is engaged in ongoing discussions with Network Rail, the railway operating company, and other relevant organisations, to provide a railway service which effectively supports the eastern corridor of Enfield and the wider Upper Lee Valley area. The AAP is</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>those Greater Anglia services presently stopping at Angel Road and Northumberland Park on the Mainline, to stop instead at Ponders End and Brimsdown. Angel Road would get four trains per hour on the STAR service and Ponders End and Brimsdown would get four trains per hour on the Mainline with that plan, and so this single investment in the Angel Road area can have a major knock on effect, providing balanced growth throughout the opportunity area, rather than unbalanced growth focussed solely upon Angel Road. All stations to Brimsdown would get the minimum turn up and go four trains per hour on this plan. Failure to lobby for this may see any additional capacity on the West Anglia Mainline divert past Enfield's other local stations.</p> <p>Expanding the AAP area and infrastructure improvements to Ponders End would help support the Council's major investment in the Alma Road Estate and could precipitate enhanced ambitions for that area and the place shaping proposals to the southern tip of the Brimsdown industrial estate. Expansion of the AAP should also be considered in light and encouragement of recent successful attempts made by Sir Alan Hasslehurst MP to have the government agree to a study of the Mainline. One of his main goals is quad tracking the line to Broxbourne.</p> <p>East to west connections do not figure enough on this plan to support the proposals, primarily as a result of failing to include Ponders End. It must be included because the A110 (Lea Valley Road) is one of just two routes that link Enfield with Waltham</p>	<p>not required to address the development and management of the rail services.</p> <p>The Ponders End and Brimsdown areas are covered by the North East Enfield Area Action Plan.</p> <p>East west connections are an important part of the AAP, including the Causeway. The aim is to increase the use of more sustainable modes of transport to tackle congestion, pollution and health issues.</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>Forest. The next east to west road link is the M25.</p> <p>The Lea Valley Road (A110) needs dual lanes on the approach to its junction with the A112 because it often backs up all the way to Ponders End. The junction with the A112 also needs a graded entry, ideally with four lanes. Two crossing ahead, one for left and one for the right hand turn with two lanes merging swiftly to one straight ahead Onto Kings Head Road. This route is so strategic that compulsory purchase of land at the junction could be justified. The road also needs an improved pedestrian footpath, improved lighting for that purpose and a dedicated cycle lane. The existing avenue of trees can be re-planted in the vast areas of open space either side of the road if necessary. Poor links with Jct 25 of the M25 should also be considered by linking the A1055 with the A121 to provide direct access to Jct 26, also helping relieve the A10 and Jct 25, but will be beyond the scope of this report due to there not being a comprehensive spatial plan for the Lea Valley.</p> <p>Disappointed that more space just north of the A406, south of Nobel Road is not considered for place shaping activities, vastly reducing the scope of this project. Hope to see more release of SIL to provide mixed use developments that do not necessarily reduce employment space if more A uses and B1 are provided for. Suggest that all areas within a 5mins walk of Angel Road Station be considered for place shaping, because the values of said areas will begin to facilitate higher density and higher value</p>	<p>A110 and A112 are outside of the AAP area, with the latter being outside of the borough. Road capacity issues are considered by the Council's Traffic and Transportation team, in conjunction with other organisations which have responsibility for public highways, including the Highways Agency and TfL, which have also been consulted for this AAP (see responses below). Also, the Upper Lee Valley OAPF (2013) also included a transport assessment.</p> <p>This area is being retained as SIL, including 'B' uses, as set out in Figure 6.1 of the Plan. Retail based 'A' uses are not considered appropriate for this area, and the AAP sets out the reasons for consolidating and focusing retail development within the Meridian Water regeneration area - see</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					developments without impairing the quantum of employment provision. In addition, allowing B2 and B8 uses to persist so close to Angel Road Station will severely reduce land values and the desirability of the whole area for inwards investment.	section 5.5 and Chapter 7.
03	A	AMEC On Behalf Of National Grid - Julian Austin			<p>National Grid has three high voltage overhead lines and one underground cable route (listed below) within Enfield Council's administrative area. These form an essential part of the electricity transmission network in England and Wales.</p> <p>National Grid has no gas transmission pipelines within the administrative area of Enfield Council.</p> <p>National Grid has a high number of gas distribution apparatus within the administrative area of Enfield Council – see the original representation for details.</p> <p>For all works within the vicinity of gas distribution assets contact Plant Protection (plantprotection@nationalgrid.com). Note that Gas pipeline diversions may take up to three years.</p> <p>National Grid may have a Deed of Grant Easement for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally written permission will be required before any works commence within the National Grid easement strip, and a deed of consent is required for any crossing of the</p>	LBE and developers will work with National Grid to ensure that development proposals do not conflict with the infrastructure in this area and take best practice fully into consideration.

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>easement. In the first instance consider checking on the land registry for the development area, if further information is required in relation to an easement contact the planning team.</p> <p>UK Power Networks owns and operates the local electricity distribution network in Enfield Council administrative area. Contact details can be found at www.energynetworks.org.uk.</p> <p>Having reviewed the document, the following sites identified within the AAP boundary are either crossed by / within close proximity to high voltage overhead lines ZBD 275 kV and ZBC 275 kV.</p> <ul style="list-style-type: none"> • Meridian Water Regeneration • Edmonton Eco Park • Deephams Sewage Treatment Works • Picketts Lock <p>National Grid only supports proposals for the relocation of existing high voltage overhead lines where such proposals directly facilitate a major development or infrastructure project of national importance which has been identified as such by central government. Therefore we advise developers and planning authorities to take into account the location and nature of existing electricity transmission equipment when planning developments.</p> <p>National Grid prefers that buildings are not built directly beneath</p>	

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>its overhead lines for the reasons of the amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy access to carry out maintenance of its equipment.</p> <p>The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed.</p> <p>National Grid seeks to encourage high quality and well planned development in the vicinity of its high voltage overhead lines. National Grid, in association with David Lock Associates has produced 'A Sense of Place' guidelines, which look at how to create high quality development near overhead lines.</p>	
04	A	Office of Rail Regulation - Anneli Harrison			<p>If the plans relate to the development of the current railway network including the operation of passenger and freight services, stations, stabling and freight sites (including the granting of track and station access rights and safety approvals) within your administrative area, the ORR would be happy to discuss these once they become more developed so the ORR can explain any regulatory and statutory issues that may arise.</p>	No action required for the AAP.
05	A	Highways Agency - David Bowie	All	NA	<p>HA interest in the Area Action Plan relates to the potential impact of resulting development traffic of sites within the development boundary on the Strategic Road Network, in this case the M25, M1 and M11. HA note that the AAP seeks to</p>	Comment noted. No further action required.

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>regenerate and develop the Central Leaside area bringing a substantial number of new homes and employment to the area including development of the Edmonton Eco Park.</p> <p>Overall the approach to dealing with development related trips accords with the HA's protocol for dealing with such matters. It is therefore 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. In addition, HA supports 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 measure also includes parking control. All such 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>Accordingly the HA 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.</p>	
06	A	Lee Valley Regional Park Authority - Claire Martin	Section 2.7	Unsound	Full reference to the PDF Area Proposals is still absent from the Area Action Plan (AAP) as is the inclusion of relevant adopted PDF Area 4 Proposals required in accordance with the terms of the Park Act, Section 14 (1) and (2).	

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>The need for the inclusion of the PDF Proposals was raised in the Authority's previous response to the draft AAP document, in Sept 2012. The Authority received assurances at both officer level and through the Examination in Public (EiP) on the Development Management Document which took place last year that the place for inclusion of the Authority's adopted proposals would be the AAPs.</p> <p>A short paragraph should be added to the end of section 2.7 Strategic Planning Context to explain the relationship between the AAP and the PDF Area Proposals. This should cover the Regional Park's remit, the Park Development Framework and adoption of Area Proposals relating to the Park within the Central Leaside Area; the following wording is suggested.</p> <p><u>A significant area of the Lee Valley Regional Park lies within Central Leaside. Created by the Lee Valley Regional Park Act 1966 its statutory remit identifies the Park as a place for recreation, leisure and nature conservation. By reason of section 14 of the Park Act, the Authority's proposals for the future management and development of the Regional Park should be included in the local planning authorities relevant planning strategies and policies (Section 14(2) (a)) although inclusion does not infer that the planning authority necessarily agrees with them (Section 14 (2) (b)). For the purposes of section 14 of the Lee Valley Regional Park Act 1966 the Park Development Framework and the Area 4 Proposals – 'The</u></p>	Text has been incorporated within section 3.2 of the AAP, as amended by the Council.

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p><u>Waterlands - Banbury Reservoir to Pickett's Lock' are the relevant Section 14 proposals.</u></p> <p>It is a statutory requirement, identified by section 14 (2) of the Lee Valley Regional Park Act 1966 to include the Authority's proposals in planning documents. Failure to do so may result in the Authority pursuing an objection against the draft proposals on the basis that the draft plan is 'unsound'. The relevant Area 4 Proposals as attached to the representation should then be included as Appendix 7 to the AAP.</p>	
06	B	Lee Valley Regional Park Authority	Vision and Objectives		The Authority supports the AAP Vision and objectives. Objective 5 'Celebrating the Lee Valley Waterways and Open Spaces' includes a number of elements helpful to the Authority in opening up access to the Park encouraging greater use of the waterways for recreation and enhancing connectivity throughout.	No further action required.
06	C	Lee Valley Regional Park Authority			The Authority welcomes the designation of Pickett's Lock and land either side of the North Circular Road, which forms part of Meridian Water, as opportunity areas. Both these sites lie within the Regional Park and are covered by PDF Area Proposals.	No further action required.
06	D	Lee Valley Regional Park Authority	CL24		CL24 states in the first paragraph: <i>The Council will continue to work with the Lee Valley Regional Park Authority to help develop its Park Development Framework, to identify the priority mix of additional recreation and leisure facilities at Pickett's Lock.</i>	Policy EL19 reflects LVRPA requirements. The Park Development Framework

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>The PDF Area Proposals for Pickett's Lock have been adopted and are set out under Proposal 4.A.4 'Pickett's Lock and Lee Park Way' – refer to the Appendix in the representation for the full content. CL24 text should be amended to read <i>"The Council will continue to work with the Lee Valley Regional Park Authority to help deliver its PDF Area Proposals"</i></p> <p>An addition should be made to the last paragraph: <i>"This policy should be read in conjunction with Core Strategy Policy 33, DMD policies 25, 82 and 89, and London Plan Policy 3.19 and 7.16 and the Park Development Framework Area Proposal 4.A.4 as set out in Appendix 7.</i></p>	Area Proposal reference is picked up in the Policy Context table.
06	E	Lee Valley Regional Park Authority	CL25		<p>CL25 includes a similar paragraph to that in CL24 referred to above, and the same reference to the Area Proposal 4.A.4 should be added at the end.</p> <p>The second part of CL25 lists the ways in which the Council will encourage the use of the green spaces and waterways at Pickett's Lock. Ponders End Lake is designated as a Site of Metropolitan Importance for Nature Conservation (SMINC) and managed for its ecological value by the Authority. The following additional reference should be made to CL25: <i>"The Council will encourage the use of the green spaces and waterways by:</i></p> <ul style="list-style-type: none"> • <u>Encouraging improvements to the ecological interest of land around Ponders End Lake and its ecological links and relationship to King George and William Girling Reservoirs</u> 	The wording of Policy EL20 has been revised to reflect the LVRPA comments and further discussions with the LVRPA.

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p><u>SSSI</u></p> <p>These amendments ensure that the Authority's Area Proposals are incorporated into the AAP policy.</p>	
06	F	Lee Valley Regional Park Authority	CL9		<p>The Authority is supportive of Policy CL9 'The Parklands' which sets out recreation and ecological proposals for land on the eastern side of Meridian Water which is also within the Park. The Authority's adopted Area Proposals have taken account of the Council's own Masterplan for Meridian Water and the two documents are complementary in relation to this area. Supporting text for Policy CL9, under paragraph 5.4.30 which makes reference to the Regional Park should also refer to the Authority's adopted Area Proposals 4.A.2 'Land adjoining the North Circular and Lee Navigation'.</p> <p>Amend the last paragraph of Policy CL9 to include:</p> <p><i>"This policy should be read in conjunction with Core Strategy Policies 4, 5, 25, 26, 30, 34, 37 and 38, and DMD policies 6, 8, 16, 37 and 43 and the Park Development Framework Area Proposal 4.A.2 as set out in Appendix 7.</i></p> <p>In this way there is a clear reference to the Authority's proposals and support for Park compatible use within this section of the Park.</p> <p>Financial contributions (through CIL or Section 106), towards the enhancement and maintenance of the Park will need to be</p>	<p>The ELAAP has significantly updated the text in this section. Policy EL 13 provides support for infrastructure provision. The Council will continue to work with the LVRPA to ensure this policy meets the requirements for Meridian Water regeneration and the LVRP.</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					considered as part of the Meridian Water development, given that Meridian Water itself is “unable to accommodate additional green space due to limited availability of land” (paragraph 5.8.10).	
06	G	Lee Valley Regional Park Authority	CL32		<p>The Authority supports CL26, 27, 28, 31 and 32.</p> <p>The Policy Framework is missing support for and protection of the existing ecological value of the Lee Navigation Corridor and the ecological potential of associated open spaces. This is a matter covered by the Authority’s Area proposals under Proposal 4.A.2 and 4.A.4.</p> <p>The Lee Navigation, associated towpath and Lee Park Way are designated as a Site of Metropolitan Importance for Nature Conservation (SMINC) from the North Circular Road north through to Pickett’s Lock. The same designation applies to the Navigation south of the NCR as it passes through Meridian Water and covers some of the land to the north and south of the North Circular Road.</p> <p>A policy reference to protecting the existing ecological value and enhancing connectivity for wildlife should be included under CL32. Ecological enhancements and improving the opportunities to get close to nature should be given greater emphasis in the policy framework to ensure the AAP balances the ecological role of the waterways with its use for leisure, amenity and transportation. Reference to the Authority’s Area Proposals 4.A.4</p>	<p>EL27 has been significantly modified from the previous AAP version, and requires development proposals to enable public access and to ‘<i>Protect and enhance habitats and biodiversity, through measures including softening of river channel edges</i>’</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					'Pickett's Lock and Lee Park Way' and 4.A.2 'Land Adjoining the North Circular and the Lee Navigation' would help to address this point.	
06	H	Lee Valley Regional Park Authority	CL6		CL6 which covers the 'Island Neighbourhood' identifies a site for a proposed school at the southern edge of the AAP area with proposed playing fields provision located at the northern edge of Tottenham Marshes. This would confound the purpose of the Regional Park which is required to serve a broad catchment of visitors and not merely local interest.	The revised AAP no longer includes this policy. An all-through school in Meridian Water is expected to support the regeneration and LBE will continue to work with the developers and stakeholders during the regeneration process to identify the most suitable location for schools and the associated playing fields.
06	I	Lee Valley Regional Park Authority	Chapter 6		The draft plan strengthens support for 3 existing employment sites, which lie adjacent to Pickett's Lock and within the Regional Park as strategic employment sites. Given their location it is suggested that policy be revised to require that on their redevelopment adequate landscaping is included to limit the physical impacts of the development.	DMD 83 provides direction on development adjacent to the green belt.
07	A	Enfield Lock Conservation Group - Martin Shepherd			The representation is titled as 'Comments on the Central Leaside AAP', but refer to the NGAR scheme, and as such the representation was forwarded on for consideration under the North East Enfield Area Action Plan.	Response forwarded to planning officer managing the NEEAAP.

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
08	A	TfL - Tristan Gielen			The A406 forms part of the Transport for London Road Network (TLRN) and traverses the Central Leaside Area on its southern extent. TfL would be pleased to discuss with Enfield Council and other parties to consider options for improvements, improving pedestrian accessibility to reduce severance.	A key objective of the ELAAP is improving connectivity, and includes policies which will reduce this severance, for example EL6 The Causeway and EL21 Improving the quality of the Pedestrian and Cycling Environment.
08	B	TfL			<p>The AAP discusses the relocation of the Harbet Road Bus Depot (paragraph 5.5.12 and paragraph 5.5.13). Safeguarding land for transport, such as a bus depot, is a key objective in the London Plan. TfL would only be satisfied with the relocation of the bus garage if a viable alternative is secured with sufficient capacity and which is at least equivalent in terms of operating costs and efficiency. TfL would be pleased to discuss options further with the Council, along with the bus operator.</p> <p>TfL is pleased that the AAP recognises the importance of bus services in the area and their supporting development, in particular through Policy CL12. TfL is responsible for planning the network of bus services but would welcome further discussions with the Council on bus service enhancement and bus infrastructure together with opportunities for funding. Improvements to mitigate the impact of development would need to be funded from the Council's CIL charging schedule and Section 106 contributions and other non TfL sources as there is no specific provision within the Business Plan. Improvements to serve existing demand would need to be assessed and prioritised</p>	<p>Enfield Council will continue to discuss the Harbet Road bus depot options with TfL, the how this facility can be relocated while maintaining the operation capacity.</p> <p>Comment noted.</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>against TfL's standard criteria within the context of the funding available for bus services and infrastructure.</p> <p>TfL request that reference be made to items such as standing spaces and driver facilities which may become feasible through redevelopment of sites and at railway stations to support the efficient operation of the bus network – this may fit best as an extra item in paragraph 5.6.25 and a bullet in Policy CL12.</p> <p>TfL suggest wording changes to the document text as follows: Policy CL12 paragraph 1 - Delete reference to "London Buses": 4.11 "The Council will continue to work closely with TfL/London Buses to..." Policy CL12 paragraph 3 - Delete reference to "London Buses": "The Council will continue to work closely with TfL/London Buses, major employers...". Bullet 5, revise to "...Support will be given to providing more direct and frequent bus services serving employment areas. London Buses TfL will be encouraged to extend the operational hours of such services to match employees shift patterns and time services to match employees travel to and from work to reflect demand" Additional bullet point (or added into bullets 6 or 7): <u>"the bus network is supported by standing spaces and driver facilities."</u></p>	Text amended in policy E23 as suggested by TfL representation.
08	C	TfL			<p>TfL is supportive of the AAPs aspiration to encourage the uptake of walking and cycling. Part of the challenges associated with this uptake is creating a legible walking and cycling environment. The AAP would benefit from making reference to wayfinding and a</p>	Policies EL12 and EL21 to refer to 'Legible London' guidance.

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>clear and consistent signage strategy. Legible London is an easy-to-use signage system that presents information in a range of ways. The maps would be integrated with the local rail stations, and recreational sites. TfL would like to work with developers and Enfield Council to expand this scheme, which would need to be predominately funded through CIL and S106 contributions.</p> <p>The AAP does not reference Enfield's Mini Holland aspirations. The AAP should clarify how cycle infrastructure will link to the town centre and wider borough.</p>	The Mini-Holland scheme is referred to in the AAP as 'Cycle Enfield'.
08	D	TfL			TfL would seek to limit private vehicle parking (except for disabled parking) across Central Leaside to promote public transport, walking, and cycling while discouraging private motor vehicle use. The AAP should refer to London Plan standards (as amended by FALP) for parking (including electric vehicle charging points and blue badge parking). Enfield Council may also want to consider introducing a Controlled Parking Zone (CPZ).	<p>Parking requirements are addressed in Section 5.8 of the ELAAP. The evidence modelling showed how parking ratios at Meridian Water will vary according to the quantum of development; e.g. at 10,000 units residential parking ratio would be an average of 49%. Sustainable modes of transport are supported and promoted throughout the ELAAP document.</p> <p>Sections 5.8 and 11.8 reference parking standards in the Development Management Document (2014), and the London Plan.</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
08	E	TfL			TfL supports utilising the River Lee Navigation for the movement of freight. The London Freight Plan (2012) aims to encourage, promote and enable the use of inland waterways such as the Lee Navigation.	This area is addressed by Policy EL24 Use of the Waterways for Transportation.
08	F	TfL			<p>TfL welcomes the AAP reference to the potential of four tracking and Crossrail 2 in terms of a potential catalyst for future intensification of land uses within the AAP boundary (particularly at Meridian Water) and to support additional growth.</p> <p>A number of the new or improved access arrangements are identified in Figure 11.1 – including the proposed Causeway – relate arrangements either across or in the vicinity of the West Anglia Mainline (WAML). Whilst such improvements are welcome, it will be necessary to ensure that such improvements do not preclude the potential future upgrade to the WAML either as part of Crossrail 2 or a standalone four tracking scheme. There should be sufficient safeguards within the AAP – in particular Policy CL1 and Policy CL27 – which identify the need for any improvements to not preclude future WAML capacity improvements.</p> <p>TfL and Network Rail should be involved in the design and potential delivery of any improvements. TfL suggests that it is included in the proposed Central Leaside AAP Officer Working Group to facilitate continued dialogue in this regard.</p> <p>As recognised within the AAP (paragraph 5.4.2), the possible introduction of Crossrail 2 or delivery of four-tracking along the WAML would further contribute to Enfield's future housing and</p>	<p>The Causeway route shown in Figure 5.1, and the potential cycle and pedestrian routes shown on Figure 11.1, do not indicate a detailed level of plans which would affect the WAML. Since the 2014 AAP document, a planning application for Zone 1 – which includes the station and a crossing over the WAML – has been approved.</p> <p>The inclusion of TfL as part of an AAP Officer Working Group will be considered at the point when this group is established.</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					economic growth offer. Evidence from Crossrail 1 demonstrates that development and regeneration benefits associated with the delivery of transformational rail schemes such as Crossrail 2 (or a stand alone four-tracking scheme) are likely to be realised well before such infrastructure upgrades become operational. Consequently, early intervention will be required if the opportunities and scale of benefits associated with any upgrade are to be realised. Whilst the precise benefits that could be realised by Crossrail 2 or four tracking of the WAML are not yet known, it would be pertinent to incorporate a review mechanism within the AAP, allowing for the assessment of development potential within the AAP to be revisited and updated if necessary. Such a mechanism will ensure that once a scheme becomes committed, any review can take place in a timely way.	The revised ELAAP has been prepared to provide a flexible framework to the opportunities and quantum of development in the area. The Council supports Crossrail 2, and as the proposals progress the Council will seek to ensure the effects of the scheme are supported and integrated in Enfield's Local Plan documents.
08	G	TfL			Part D refers to requirement of developer funding to facilitate transport improvements throughout the study area. It is suggested that section 14.4 bullet point Section 106 is amended to add " <u>...and to address site-specific issues such as access and bus service contributions</u> " to reflect aspirations for enhanced bus services which can be secured via S106 agreements.	Policy EL13 on infrastructure delivery includes enhancing the bus network as an item in the S106 obligations project list. In Part D, S106 is referenced as having an important role in addressing site-specific issues such as access.
08	H	TfL			In 2014 a Development Infrastructure Funding Study (DIFS) for the Upper Lee Valley (ULV) was commissioned jointly by the GLA/TfL and the London Boroughs of Enfield, Hackney, Haringey and Waltham Forest. The study is due for completion in spring 2015 and will identify the strategic infrastructure required to	The ELAAP references the Development Infrastructure Funding Study (DIFS) in section 14.3.13.

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					deliver the growth outlined in the ULV OAPF. The DIFS will identify how infrastructure delivery can be phased and prioritised in line with forecast development. The AAP should make specific reference to the DIFS in relation to funding and delivery of infrastructure improvements. This is particularly relevant to the funding and delivery of Angel Road Station.	
08	I	TfL			TfL agrees that station and interchange enhancements at Angel Road station are important to support development at Meridian Water (Policy CL11). The DIFS will reflect how these improvements will be funded and delivered.	Comment noted. No further action required.
09	A	Epping Forest Council - Ian White	All	NA	Epping Forest has no comments to make on the AAP. They would like to be kept up to date with the progress of the Plan.	No further action required.
10	A	Environment Agency - Jane Wilkin	General	Sound	Paragraph 100 of the NPPF requires Local Plans to apply a sequential risk based approach to the location of development to avoid, where possible, flood risk by applying the Sequential Test and where necessary the Exception Test. A high-level Sequential Test was undertaken as part of the Core Strategy to identify areas for growth and a Level 2 Strategic Flood Risk Assessment (L2 SFRA) was undertaken in July 2013 to support the Meridian Water Masterplan. Section 3.6 (and paragraphs 3.56, 3.69, 4.51 and 4.67) of the L2 SFRA states that despite the high level Sequential Test, a further	The ELAAP policy (EL8) on managing flood risk at Meridian Water has been substantially updated since the previous AAP

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>Sequential Test will need to be applied to Priority Regeneration Area boundary to steer development to areas of lowest flood risk.</p> <p>It does not appear that a sequential test has yet been undertaken for the sites allocated in the AAP, nor does the Sustainability Appraisal include specific appraisal criteria to steer development to areas at lowest risk of flooding, above taking actions such as schemes to increase flood storage capacity and deliver of flood resistant homes.</p> <p>Core Strategy Policy 28 states that development of sites in the CLAAP that lie within flood zones 2 and 3a but that contribute to the strategic objectives for change in the Upper Lee Valley will be supported in principle. However, such schemes will be expected to comprehensively address flood risk and in particular the Sequential Approach, Exception Test, and all other requirements of PPS25 will still need to be applied to individual developments. The high level Sequential Test, the core strategy, masterplan and L2 SFRA all state that a more detailed sequential test should be carried out for these specific developments.</p> <p>Although it does not appear that a Sequential Test has been carried out for this AAP, EA are satisfied that the high level Sequential Test that has been undertaken for the Core Strategy will be sufficient for the purposes of the AAP. However, this is subject to the Sequential Test being applied for individual</p>	draft version. All developments will require a detailed site specific Flood Risk Assessment (FRA) to be submitted with each individual planning application, in accordance with the requirements of the NPPF, Enfield's Level 1 SFRA and the recommendations of the Level 2 SFRA.

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>planning applications as required by Core Strategy policies 28 and 38, supporting text of the CLAAP 12.1.11 and paragraph 33 of the NPPF.</p> <p>The requirement for developments to undertake sequential test should be included in Policy CL16 of the AAP – see the EA representation form which comments specifically on this policy with suggested wording.</p>	
10	B	Environment Agency	Objective 5	Sound	<p>EA agree with the inclusion of an objective in the Plan to Celebrate the Lee Valley Waterways and Open Spaces, and in particular to manage flood risk.</p> <p>In conjunction with flood risk EA recommend the inclusion of an additional point in this objective to improve green infrastructure, habitat and the status if the waterbodies classified by the Water Framework Directive and Thames River Basin Management Plan.</p>	<p>Add the following text to Objective 5:</p> <ul style="list-style-type: none"> • <i>Create a linked network of <u>blue and green spaces and waterways which improve green infrastructure and habitats</u>;</i>
10	C	Environment Agency	Para 3.1	Sound	<p>There is great scope for delivery of environmental improvements through regeneration of this area EA have concerns that environmental opportunities are not included in the themes considered within this section.</p> <p>Suggest another bullet point is included within paragraph 3.1 to reflect the environmental opportunities within this area such as “Environment and Flood Risk”. Also suggest a corresponding paragraph:</p> <p><u>Central Leaside has areas of Flood Zones 2&3 (medium to high flood risk), and several watercourses including the Lee</u></p>	<p>Flood risk and management are addressed in other parts of the document, e.g. Objective 5, EL8, EL9, EL12, EL27 and EL28.</p> <p>This text is included in the table in Section 2.2.</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<u>Navigation, Lee Cut, Lee flood relief channel, Salmons Brook and Pymmes Brook. New development provides an opportunity to reduce flood risk and improve green and blue infrastructure using the outcomes of the Thames River Basin Management Plan, L1&2 Strategic Flood Risk Assessments and Surface Water Management Plan. The area also comprises a large amount of former industrial and potentially contaminative uses.</u>	
10	D	Environment Agency	CL16		EA pleased to see that the flood risk has been highlighted and that there is a specific policy CL16 to address this. As the area comprises brownfield land, with former gasholders in particular, EA recommend the design principles for these areas of development highlight the potential impacts on land quality and implications for surface and groundwater quality. This could be included within either the policy or reference in the supporting text to DMD policy 66.	Policy EL8 requires a sustainable approach to flood risk, including the use of SUDs.
10	E	Environment Agency	CL3, 4, 5, 6, 7, 8, 9 and 17		EA support this policy and the requirements to undertake river re-profiling, flood storage creation and the creation and enhancement of habitat within this location. For the second round of the Thames River Basin Management Plan EA have undertaken an assessment of potential actions to help achieve good status of the waterbodies, which include actions such as those put forward in policy CL9. The AAP provides an excellent opportunity to include these specific actions for all areas within Central Leaside, not just the Parklands. EA recommend consideration of their inclusion either within the area specific policies or under a new policy specific for WFD improvements (similar to policy CL16).	The approaches are supported for Meridian Water by policies EL9 and EL9, with the latter requiring optimising of the water network through ' <i>enhancing the existing watercourses across the site including environmental remediation, biodiversity enhancements, and the naturalisation of banks where appropriate</i> '.

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>A separate map provided by EA shows these actions within the plan area.</p> <p>Policies CL3, 4 & 5 additional suggested text:</p> <ul style="list-style-type: none"> • <u>Deculverting of the Pymmes Brook through Meridian Water associated with the development of the site and flood alleviation works.</u> • <u>Removal of concrete banks associated with the development of Meridian Water. Full restoration including deculverting and flood alleviation works.</u> • <u>Install Sustainable Urban Drainage Systems through Meridian Water Development</u> <p>Policies CL6 & 7</p> <ul style="list-style-type: none"> • <u>Install fish pass on Flood Relief Channel structure near Banbury Reservoir</u> <p>Policy CL8:</p> <ul style="list-style-type: none"> • <u>Remove hard banking and create marginal and reedbed habitats along the length of the off side of the navigation</u> • <u>Deculverting of Salmons Brook and full river restoration within the Meridian Water Development.</u> <p>Policy CL9: The Parklands</p> <ul style="list-style-type: none"> • <u>Ensure that boats are restrained to the centre or tow path side of the navigation, allowing aquatic and marginal vegetation to establish on the off side.</u> <p>Meridian Water Actions (this could be included within policy CL17):</p> <ul style="list-style-type: none"> • <u>Deculverting of Salmons Brook and full river restoration</u> 	<p>At the AAP-wide level, EL27 requires proposals at waterfront locations to <i>‘Protect and enhance habitats and biodiversity, through measures including softening of river channel edges’</i>.</p> <p>These requirements are also supported on a borough-wide basis by policy DMD 63 ‘Protection and Improvement of Watercourses and Flood Defences’.</p> <p>Since the EA set out these detailed changes, the policies have been significantly amended or removed. The ELAAP policies provide an appropriate level of detail in advance of more location-specific plans coming forward at Meridian Water.</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p><u>within the Meridian Water Development.</u></p> <ul style="list-style-type: none"> • <u>Deculverting of the Pymmes Brook through Meridian Water associated with the development of the site and flood alleviation works.</u> • <u>Removal of concrete banks associated with the development of Meridian Water. Full restoration including deculverting and flood alleviation works.</u> • <u>Install Sustainable Urban Drainage Systems through Meridian Water Development</u> • <u>Restore natural bank and bed habitats through the Meridian Water development.</u> • <u>Enhancement of marginal vegetation associated with the development of Meridian Water.</u> • <u>Improve Flood Plain connectivity through Meridian Water associated with the development of the site and flood alleviation works.</u> <p>Wider Central Leaside Actions:</p> <ul style="list-style-type: none"> • <u>Seek Softening of River Lee Flood Relief Channel through various techniques</u> • <u>In channel habitat enhancement at Saddlers Mill Stream.</u> • <u>Replace hard engineering with soft engineering solution within the Salmons Brook and reducing flood risk to riparian land.</u> • <u>Engineering to re-meander at Montague Road Recreation Ground.</u> • <u>Screening on water pumping station at top end of William Girling reservoir (left hand side) Keides weir.</u> 	

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<ul style="list-style-type: none"> • <u>Improve sediment management through sediment matters approach</u> • <u>Manage riparian and emergent vegetation to create more diverse habitats.</u> 	
10	F	Environment Agency	CL16		<p>EA are pleased to see a specific policy for managing flood risk in Meridian Water based on L1 & L2 SFRA recommendations. This policy should also incorporate Enfield's Surface Water Management Plan recommendations and actions. To further strengthen the policy EA ask that the requirement for all development in Flood Zones 2 and 3 will be required to carry out a sequential test prior to undertaking a Flood Risk Assessment, in accordance with the requirements of the National Planning Policy Framework.</p> <p>Suggested text changes: <i>The Council will continue to work in partnership with the Environment Agency, the Lee Valley Regional Park Authority, Thames Water and the Canal & Rivers Trust to secure an integrated and sustainable approach to the management of development and flood risk through complementary flood mitigation and water management measures.</i> <u>All development must first undertake a sequential test to ensure development is steered to areas at lowest risk of flooding. On passing the sequential test all development will require a detailed site specific Flood Risk Assessment (FRA) to be submitted with each individual planning application, in accordance with the requirements of the NPPF, Enfield's Level</u></p>	<p>In consultation with the Council's flood risk specialists, Policy EL8 on managing flood risk in Meridian Water has been revised extensively. The Council would welcome EA views on the amended text.</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p><i>1 SFRA and the recommendations of the Level 2 SFRA.</i></p> <p><i>Any new land identified as potential flood storage areas must be connected to the floodplain. Flood storage areas should not be remote from the proposed development site, as disruption to local flow patterns and flood mechanisms would be likely to result due to displacement of water.</i></p> <p><i>Development should respond to the following principles:</i></p> <ul style="list-style-type: none"> <i>• Consideration given to the condition of embankments around the reservoirs and Lee Navigation and maintenance regimes associated with these features;</i> <i>• Widening and restoration of the Pymmes Brook, Salmons Brook and Flood Relief Channel rivers;</i> <i>• Volumes of floodplain lost must be equal to the compensatory storage volume added and provided on a volume-for-volume and level-for-level basis to ensure that local flow patterns and storage are not disrupted.</i> <i>• The implementation of Sustainable Urban Drainage Systems (SuDS) for all new developments and attenuation. It is likely that overland storage will be required to achieve this; and</i> <i>• Storage added must also be at equivalent ground levels to the levels of any storage to be lost, in order</i> 	
11	A	Thames Water Utilities Ltd - David Wilson (Savills) and Mark	Chapter 6 CL18	Unsound	Allocation of the Deephams Sewage Works site as Strategic Industrial Land (SIL) is not sound. The Council has not provided adequate justification for the proposed designation, with the CLAAP simply identifying that the site has an industrial character. Whilst this may be the case, the CLAAP does not recognise that	Text has been inserted to recognise Thames Water as the site owner at para 9.1.2: ' As the owner and

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
		Matthews (Thames Water)			<p>the STW 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 the Deephams upgrade will see development take place that will ensure its ongoing operational use for a period extending at least beyond the life of the CLAAP.</p> <p>The CLAAP (in paragraph 6.3.14) identifies how increased numbers of employees will be delivered in the area, including specific reference to the Deephams STW Upgrade, which is potentially misleading as aside from temporary construction workers, there will be no significant increase in employment on site following the completion of the Upgrade.</p> <p>Paragraphs 6.4.6 and 6.4.7 suggest 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 potentially misleading as the implication is for potential employment development or redevelopment of the site, un-related to its operational sewage works use, contrary to Thames Water’s investment in the site for wastewater treatment use. Deephams providing critical sewage treatment infrastructure serving a population equivalent of 891,000 (as at 2011).</p> <p>The CLAAP rightly acknowledges (para 6.4.7) that following</p>	<p><u>operator of the site,</u> Thames Water ...’</p> <p>Infrastructure is a suitable use within SIL (see Edmonton EcoPark) and the designation of the Deephams STW as an area of SIL is appropriate.</p> <p>Updated text at paragraph 6.4.4; <i>‘Designating the Deephams STW site as SIL involves extending the SIL Preferred Industrial Location (PIL) designation north to cover land occupied by the sewage works. Although the inclusion would not represent a gain in SIL floorspace, it would will consolidate and strengthen the protection of the area for future employment uses. The utilities infrastructure at Deephams is an industrial-type use which is would be appropriately contained within for SIL designation, thus resulting in an additional 34 hectares of SIL</i></p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>completion of the Deephams Upgrade, some space within the existing site would be made available. However, this land will be retained by Thames Water so that it can accommodate future sewage works developments on the site, thereby making the site resilient to accommodate future changing environmental standards or population growth. It is also publicly known that Thames Water intends to apply for planning permission for an upgrade to the sludge treatment processes at Deephams in 2015, and this also needs to be accommodated on the site. The Council's reference to there being potential for the site to accommodate "interim ... non-waste infrastructure uses" is not explained in the CLAAP, nor is there any evidence to demonstrate how this would be accommodated within the constraints identified above, or delivered given Thames Water's landownership and its Operational land status.</p> <p>On the basis of all of the above, Thames Water objects to the proposed designation of the Deephams STW as SIL in Policy CL18 of the CLAAP, as referred to in Chapter 6 and identified on the Proposals Map. The proposal is considered to be unsound as it has not been positively prepared on the basis of the evidence available, it is not justified as the Council has not explained why the designation is necessary or appropriate, nor is it effective as the proposal for employment development on the site is not capable of being implemented.</p> <p>TW wants all references to the proposed designation of Deephams Sewage Works as SIL should be deleted from the</p>	designation.'

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					CLAAP.	
11	B	Thames Water Utilities Ltd	Chapter 9 CL23	Unsound	<p>TW welcomes the explicit policy support for the development of wastewater uses on the site, but the proposed wording of the Chapter and Policy require amendment to ensure that the CLAAP is positively prepared, justified and effective.</p> <p>The wording of the CLAAP does not acknowledge the imminent grant of planning permission by LB Enfield for the Deephams STW Upgrade (application 14/02612/FUL). Construction work on the Upgrade will commence in Spring 2015 and be underway by the time the CLAAP is adopted. The content of Chapter 9 and CL23 will be out of date by that time, as opposed to guiding future development proposals on the site.</p> <p>Elements of the wording of CL23 are not justified as they relate to the recent Upgrade permission and require amendment, including the wording relating to visual impact, landscape and ecological treatment, tree planting, and noise impacts. Alternative wording is proposed.</p> <p>Amend Para 9.1.1 – the Population Equivalent figure is 891,000 (at 2011), not the stated figure of 883,000. Delete Para 9.1.5 and replace with the following text: <i>“Thames Water submitted a planning application (14/02612/FUL) for the Deephams Sewage Works Upgrade in July 2014 and planning permission was granted by London Borough of Enfield in February 2015. The construction of the Upgrade will</i></p>	<p>The reference to the Deephams STW planning permission is updated.</p> <p>Updated policy EL18 to reflect the current position at Deephams STW.</p> <p>Paragraph 9.1.1 amended to reflect the updated figures.</p> <p>Paragraph 9.1.3 showing the amended text.</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>take place in phases with construction due to be completed in 2018. Land within the Deephams Sewage Works site will be retained for future upgrades to the sewage treatment infrastructure, including sludge treatment upgrades. Proposals for the development of new wastewater infrastructure at Deephams Sewage Works are guided by Policy CL23”.</p> <p>Delete Para 9.1.6 as references to the designation of the site as SIL should be deleted (see separate representation on Chapter 6 and Policy CL18).</p> <p>Amend the wording of Policy CL23 (changes highlighted):</p> <p><i>The Council will work closely with Thames Water and its development partners to ensure the proposed <u>Deephams Sewage Works Upgrade</u> continues to cater for population growth in the catchment area, <u>meets water quality standards in the Environmental Permit, and</u> The proposed upgrade of Deephams STW is in line with the new discharge consent set by the Environment Agency, meeting water quality targets and will significantly reduce odour emissions from the site.</i></p> <p><i>The following principles should be incorporated into <u>future development proposals for development at Deephams Sewage Works</u>STW:</i></p> <ul style="list-style-type: none"> <i><u>The location and High quality design of development within the site to standards which effectively combine function and form to address the</u> avoid unacceptable visual impacts on the environment local landscape, nature conservation or</i> 	<p>Paragraph 9.1.6 has been removed.</p> <p>The updated text is in Policy EL18.</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>residential amenity;</p> <ul style="list-style-type: none"> The incorporation of appropriate landscape treatment throughout the site to and opportunities to enhance ecological links to the wider Central Leaside area; Tree planting to visually improve and enhance the site's image; Promote green industry employment renewable energy generation and sustainable design and construction; Promote sustainable transport for staff; and Require connection to the Lee Valley Heat Network if feasible; and Measures to minimise noise impacts along the eastern boundary of the site adjacent to the Lee Valley Regional Park. 	
11	C	Thames Water Utilities Ltd	CL9	Unsound	<p>TW does not object to the policy in principle, but consider that it needs to be improved in relation to their landholdings and infrastructure constraints.</p> <p>Meridian Gardens - TW own land at Harbet Road (to the south of the North Circular) which is located within the Meridian Gardens area. Major underground infrastructure runs through this area which has the potential to significantly constrain the future use of this land.</p> <p>The Lee Valley Regional Park Authority (LVRP) also has proposals for the site as set out in their Park Development Framework. TW considers it is important that the proposals for this site are discussed jointly between LB Enfield, Thames Water and LVRPA.</p>	<p>This section and policy EL9 have been substantially revised in the revised AAP document. Paragraph 5.10.6 states that 'The Council will work with the Lee Valley Regional Park Authority and Thames Water to develop any landscaping and access proposals in these areas.'</p> <p>The Council will continue to discuss the policy and supporting text with</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>Any proposal would be subject to agreement of commercial terms as TW would want to ensure maximisation of the land value for their customers; alongside promoting wider recreational and educational aspirations that stakeholders such as the borough may have.</p> <p>Thames Water Land to the South of William Girling Reservoir - TW own land to the north of the North Circular and south of William Girling Reservoir which is within The Parklands area.</p> <p>Whilst the document does not specifically refer to the TW 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.</p> <p>TW'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 TW's operational use.</p> <p>Any proposals would be subject to agreement of commercial terms as TW would also want to maximize the land value for their customers; this is alongside promoting wider recreational and educational aspirations that stakeholders such as the borough may have.</p>	Thames Water, and other stakeholders.

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>Banbury Reservoir - The policy does not mention that Banbury Reservoir is an operational reservoir owned and operated by TW for public water supply.</p> <p>TW agrees 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 are not compromised.</p> <p>A watersports centre is potentially feasible, subject to understanding the detailed proposals. However, a floating clubhouse could not be permitted for operational reasons due to 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>Reference needs to be made in CL9 and supporting text to the constraints identified above on TW land.</p> <p>Reference should also be made to the need to work with TW 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.</p>	

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
11	D	Thames Water Utilities Ltd	CL17	Unsound	<p>TW does 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 co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the NPPF states: "Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver: ... the provision of infrastructure for water supply and wastewater ..."</p> <p>Paragraph 162 of the NPPF relates to infrastructure and states: "Local planning authorities should works with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas."</p> <p>The NPPG section on 'water supply, wastewater and water quality' sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/ wastewater companies align with development needs. The introduction to this section also sets out that "Adequate water and wastewater infrastructure is needed to support sustainable development" (Para: 001, Ref ID: 34-001-20140306).</p>	<p>The requirement for assessment and, as necessary the improvement, of infrastructure for developments at Meridian Water is provided by policy EL13 which requires that <i>'For each phase/ zone of development in Meridian Water the developer must agree with the Council an outline application which includes the infrastructure needs to support the level of development within the identified phase/ zone, and sets out the</i></p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>Water Supply Infrastructure - It will be necessary for investigations to be undertaken to review the impact of the development in relation to water supply capacity. It should be noted that in the event of an upgrade to TW's assets being required, up to three years lead in time will be necessary. TW would welcome the opportunity to work with the Council and developer on opportunities for water efficiency for the new development.</p> <p>Drainage - In principle there is likely to be capacity available for the development. However there may be need for localised upgrades and specific requirements for certain development sectors to be connected to the existing system at specific locations. TW support SUDs in appropriate locations.</p> <p>Water Supply/Drainage Strategy - Given the above water supply and drainage infrastructure comments, TW consider that a comprehensive Water Supply and Drainage Strategy for the Meridian Water proposals should be prepared by the Developer/Council in consultation with TW and the Environment Agency.</p> <p>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:</p>	<p><i>planning obligations necessary to enable this supporting infrastructure'.</i></p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p><u>“A Water Supply and Drainage Strategy will need to be undertaken in association with the development. The Strategy will need to demonstrate that adequate water supply and sewerage infrastructure capacity both on and off the site is available to serve the development and that it would not lead to problems for existing users. Where there is a capacity problem and no improvements are programmed by Thames Water, then the developer needs to contact Thames Water to agree what improvements are required and how they will be funded prior to any occupation of the development. Further information for Developers on water/sewerage infrastructure can be found on Thames Water’s website at: http://www.thameswater.co.uk/cps/rde/xchg/corp/hs.xsl/558.htm</u></p> <p><u>Or contact can be made with Thames Water Developer Services: Post at: Thames Water Developer Services, Reading Mailroom, Rose Kiln Court, Rose Kiln Lane, Reading RG2 0BY; Tel: 0845 850 2777; Or email: developer.services@thameswater.co.uk</u></p>	
11	E	Thames Water Utilities Ltd	CL25	Unsound	<p>The Picketts Lock Leisure complex is located to the north of Deephams ST W. Policy CL25 aims to increase the number of visitors to the site and the leisure facilities available.</p> <p>Deephams STW is due to undergo a major upgrade which is due to be completed in 2017/18 and will significantly reduce odour emissions from the site. However, it will not be possible to</p>	<p>Policies EL19 and EL20 do not propose or support housing at Pickett’s Lock. There is borough-</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>completely eliminate odour and there are other odour sources in the locality.</p> <p>When considering sensitive development, such as residential uses, close to industrial, waste and utility related development, a technical assessment should be undertaken by the developer or by the Council in consultation with the relevant land owners of the industrial, waste and utility related development, such as TW. The technical assessment should confirm that either: (a) there is no adverse amenity impact on future occupiers of the proposed development or; (b) the development can be conditioned to ensure that any potential for adverse amenity impact can be avoided/mitigated. The AAP should incorporate text to require a technical assessment.</p>	wide policy for environmental assessment and protection; in particular see DMD chapter 11 Environmental Protection and DMD 65 on air quality.
11	F	Thames Water Utilities Ltd	CL32 Plan 11.1	Unsound	<p>Thames Water owned land at Harbet Road (to the south of the North Circular) and to the north of the North Circular and south of William Girling Reservoir, which are included within The Meridian Water Parklands area, are shown as Proposed Public Open Space.</p> <p>TW'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 TW's operational use. Any proposals would be subject to agreement of commercial terms as TW would want to ensure they maximize the land value for their customers; this is alongside promoting wider recreational and</p>	<p>Policy EL28 states that '<i>The Council will work with stakeholders, including the landowners, to bring forward new areas of open and green space and bring underused and vacant spaces back into active use</i>'.</p> <p>Figure 11.1 shows the green areas to the north and south of the A406 as '<i>inaccessible open space</i>'.</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>educational aspirations that stakeholders such as the Borough may have.</p> <p>The proposal for Public Open Space on TW owned land should be deleted.</p> <p>Reference should made for the need for the Council to work with TW to agree a way forward for proposals involving TW land at Harbet Road and to the south of William Girling Reservoir.</p>	
11	G	Thames Water Utilities Ltd	Figure 3.1	Unsound	<p>Thames Water owned land at Harbet Road (to the south of the North Circular) and to the north of the North Circular and south of William Girling Reservoir are shown on the plan as existing Public Open Space. This is incorrect.</p> <p>TW'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>TW'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 T W's operational use.</p> <p>The Public Open Space designation on this land should be deleted from Figure 3.1 and throughout the CLAAP.</p>	<p>Figure 2.3 shows the green areas to the north and south of the A406 as '<i>inaccessible open space</i>'. Other mapping reference updated throughout the rest of the AAP document.</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
11	H	Thames Water Utilities Ltd	12.3	Unsound	<p>Paragraph 12.3.1 states that the Lee Valley Heat Network will connect to Deephams Sewage Works.</p> <p>At a meeting between the Lee Valley Heat Network Company (LVHNC) and Thames Water in January 2015, the LVHNC set out that the LVHN may not actually directly pass Deephams STW and that it was unlikely to prove viable to divert to Deephams. It was also set out that Deephams STW is self-sufficient in heat requirements and is unlikely to have any significant surplus heat to export. Therefore, it is not certain that Deephams STW will connect to the LVHN.</p> <p>Reference to Deephams Sewage Works connecting to the LVHN should be deleted as this is unlikely to prove viable.</p>	<p>Paragraph 12.3.1 no longer references connection to Deephams STW.</p> <p>Policy EL18 on Deephams STW now requires a connection to the LVHN only if feasible.</p>
11	I	Thames Water Utilities Ltd	12.4	Unsound	<p>TW owned land to the South of William Girling Reservoir and 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>TW'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 TW's operational use.</p> <p>Any proposals would be subject to agreement of commercial terms as TW would want to maximize the land value for their customers; this is alongside promoting wider recreational and educational aspirations that stakeholders such as the Borough may have.</p>	<p>The policy approach to managing flood risk at Meridian Water is set out in Section 5.9 and EL8. Specific locations for flood storage are not specifically referenced, while policy EL8 states that the Council will work in partnership, including with Thames Water.</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					Reference should made for the need for the Council to work with TW to agree a way forward for proposals involving TW land at Harbet Road and to the south of William Girling Reservoir.	
12	A	Natural England - David Hammond			NE welcomes the reference to the Lee Valley Regional Park Authority, and the Council is encouraged to reference the most update version of the Parks' Management Plan, as it is not clear from the document which iteration has been referenced.	See response to LVRPA above.
12	B	Natural England	Paras 5.8.9 to 5.8.13		Reference to Public Open Space and Play Space is welcomed, having the potential to provide green open spaces and biodiversity and environmental opportunities for the area. Biodiversity and the natural environment can lead to opportunities, for wildlife activity and connection, health, recreation, contributing to climate change adaptation and improving quality of life. NE encourages the Council through its Local Plan policies to ensure the borough's green infrastructure is designed to deliver multiple functions	No further action necessary.
12	C	Natural England		Not stated	<p>The document makes no reference to the proximity of designated sites; the Chingford Reservoirs Site of Special Scientific Interest (SSSI) abuts the area along its eastern boundary.</p> <p>NE provided comments on the Sustainability Appraisal Scoping report in their response of 18/06/14 which referred the SSSI.</p> <p>Welcome the reference to exploiting opportunities for recreation and leisure along the waterways, but there is no indication of</p>	<p>The ELAAP makes numerous references to the networking of green and blue spaces, and the need to support biodiversity.</p> <p>EL9 requires the provision of sufficient open space within Meridian Wader - including parks and linear spaces, along with</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>considering issues of recreational disturbance and pressure on the SSSI, or potential for impacts on the hydrological pathways within the area.</p> <p>Sustainable Development could be strengthened further by reference to Green Infrastructure, open space and or biodiversity provision, through cross referencing sections of the document. Under celebrating Waterways and Green Spaces (paragraph 13.1.4) there is reference to the potential for a new pocket park which would be welcomed and supported</p> <p>The Council should look at the fragmentation of open spaces and the linking of them back to paths and other sites, Policy CL32 – New and Existing Open Spaces would be appropriate. This would provide opportunities to link sites and areas, whilst also offering sustainable transport options through walking and cycling, together with increasing and enhancing the green infrastructure network. This could also help with issues of recreational pressure and disturbance on the SSSI.</p>	<p>habitat to enhance biodiversity. EL12 requires environmental remediation, biodiversity enhancements, and the naturalisation of banks along the Meridian Water watercourses. EL27 requires access to waterfront locations along with protecting and enhancing habitats and biodiversity</p> <p>EL28 supports access across and between existing and new green spaces, developing a network of 'green chains' comprising footpath networks and cycle paths.</p>
13	A	English Heritage - Graham Saunders			<p>In general support the Council's aspiration to regenerate the Central Leaside and its objectives of building sustainable urban neighbourhoods, facilitate economic growth, improve connectivity, deliver sustainable regeneration and celebrate the existing waterways and open spaces that characterise the area. EH note that the Council's characterisation study summary (B.VII:</p>	<p>Paragraphs 2.1.5 and 2.1.6 reference the rich industrial heritage evident in the form and structures of the waterways themselves, and that Edmonton</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					Lea Valley Regional Park, and trading and industrial estates east of Meridian Way) that covers parts of the area states the southern part of this area is, as a result of its purely functional purpose and relatively recent date, understandably devoid of architectural or historic (or indeed any visual) interest. However, the AAP adjoins and include some heritage assets that should be recognised and used to inform management of change. To the west is Montagu Cemeteries Conservation Area, and the significance as represented by its setting should be considered. To the east and on the boundary of the AAP is a collection of grade II listed buildings at Chingford Mill, which again should be considered in terms of their significance including their setting.	Leaside lies within an Area of Archaeological Importance, while the Montagu Road Cemeteries Conservation Area is directly adjacent to the west of the AAP boundary. Policy EL12 requires proposals to <i>'Demonstrate an understanding of the industrial heritage and archaeology of the area'</i> .
13	B	English Heritage			EH seek further consideration be given to any industrial heritage which the area may contain, including the potential for archaeology. For example the NPPF identifies three dimensions to sustainable development, which include economic, social and environmental considerations (para 7). It also stresses that Plans should seek opportunities to achieve each of the dimensions of sustainable development, and net gains across all three (para 152), including seeking positive improvements in the quality of the built, natural and historic environment (para 9). At present the Plan does not appear to utilise any opportunities for using the historic environment as basis in which to inform the development of Central Leaside and its connection with its surroundings.	Paragraphs 2.1.5 and 2.1.6 reference the rich industrial heritage evident in the form and structures of the waterways themselves, and that Edmonton Leaside lies within an Area of Archaeological Importance, while the Montagu Road Cemeteries Conservation Area is directly adjacent to the west of the AAP boundary. Policy EL12 requires proposals to

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>EH would welcome the opportunity to discuss how the AAP can be improved so that it addresses the concerns raised, before the Plan is tested at examination.</p> <p>EH suggest explicit reference is made to the Council's characterisation study and any other analysis of the historic environment as part of setting the scene with regards to helping to identify elements of the existing environment that has the potential to be protected, conserved and enhanced. This evidence could be used as to inform a revision of the existing objectives of the AAP, and 'Central Leaside at a glance' section. Within Part B of the Plan these changes could then help inform where appropriate opportunities to utilise the historic environment in contributing to delivering the objectives of the Plan and specific schemes. For example in Meridian Water there is a reference to the area's industrial heritage (para 5.1.4 of the AAP). However no further information is provided to understand how it defines the area and how it can be used to help inform new developments in Meridian Water. It is appreciated that the AAP is strategic and that there is a Masterplan for the area, however there is potential to provide be greater detail in which to provide robust strategic guidance on the development of this potentially sensitive area.</p> <p>The "policy context" (para 5.2 of the AAP) does not include any heritage policies as set out in the London Plan or Council development plans. This absence reinforces concern that</p>	<p><i>'Demonstrate an understanding of the industrial heritage and archaeology of the area'.</i></p> <p>The Enfield Characterisation Study is referenced in Section 5.2.</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					heritage issues have not be fully assessed or taken into account. This includes listed buildings and conservation areas, as well as the potential for archaeology and wider historic landscape character that helps define the wider Lee Valley.	
14	A	North London Waste Authority - Andrew Lappage	CL22	Unsound	<p>Ecological Enhancements The Policy CL22 words 'ecological enhancement' go beyond the requirements of the adopted Edmonton EcoPark SPD, and no evidence is provided in the AAP as to why the ecological enhancement is required.</p> <p>The Council should delete the words in Policy CL22 in brackets '(including ecological enhancement)'</p> <p>Reference to Emissions The requirements imposed by policy CL22 to 'Avoid or minimise emissions to air and water' are inconsistent with the site's use for waste management, and the EcoPark SPD, as is it not possible to completely emissions to air or water at a waste treatment facility such as this.</p> <p>The Council should remove the words 'avoid or' to make policy CL22 consistent with the requirements of the EcoPark SPD sections 4.2.45 – 4.2.46.</p> <p>Transport The proposed requirement by CL22 for development on the</p>	<p>The revised ELAAP document Policy EL17 Redevelopment of the EcoPark Site has removed the term 'ecological enhancement'.</p> <p>The revised ELAAP document Policy EL17 Redevelopment of the EcoPark Site now states that proposals are required to '<i>minimise emissions to air and water...</i>'</p> <p>The revised ELAAP document Policy</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>EcoPark to enable sustainable forms of transport including water borne transport is unworkable in practice. The AAP goes beyond the requirements of the Core Strategy and EcoPark SPD in terms of its requirement to 'enable' sustainable forms of transport and 'minimise' rather than 'mitigate' transport impacts.</p> <p>The Council should amend the wording of CL22 to wording which is consistent with the Edmonton SPD in terms of local transport impacts and requirements for sustainable transport.</p> <p>Policy consistency Comparing CL22 Edmonton EcoPark with CL23 for the development of Deephams STW (recognising that the former is subject to an SPD and the latter is not), the Deephams policy refers to working in line with the new discharge consent from the EA, whereas CL22 doesn't refer to permit limits but instead refers in more detail to the Council's requirement in relation to various emissions. There is inconsistency within the policies which relate to waste sites within the AAP area.</p> <p>To ensure consistency in policy reference to waste sites within the AAP area, CL22 bullet points which refer to emissions, nuisance and odour should be deleted, and it should be simply noted that facilities need to operate in line with relevant permits, a policy approach consistent with CL23.</p>	<p>EL17 Redevelopment of the EcoPark Site now states that proposals are required to <i>'Mitigate local transport impacts, and support, where viable, sustainable forms of transport including water borne transport'</i>.</p> <p>The revised ELAAP document Policy EL17 Redevelopment of the EcoPark Site now states that proposals are required to <i>'Operate within permitted limits on nuisance risks such as noise and odour'</i></p>
14	B	North London	Figure 11.1	Unsound	Figure 11.1 shows a proposed footpath crossing the southern	

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
		Waste Authority	And Para 11.4.16		<p>part of the EcoPark site and paragraph 11.4.16 refers to a new pedestrian and cycle bridge over Salmon's Brook to connect Edmonton EcoPark to the links to the west.</p> <p>The NLWA cannot allow a requirement for a footpath on industrial land. The path would cut directly across the front entrance used by all staff and waste vehicles using the site. The NLWA therefore has significant safety concerns and the cost of overcoming these would be prohibitive. No such footpath is shown in the EcoPark SPD.</p> <p>The NLWA made the same representation in November 2011 on the ULVOAPF (Fig 7.3), and in the final version of the document of July 2013 the path had been removed (Fig 7.8).</p> <p>The proposed path also conflicts with the proposed location of the Lee Valley Heat Network (LVHN).</p> <p>The plans for the footpath across the EcoPark site should be removed from Figure 11.1 and the references to the path removed from para. 11.4.16.</p>	The revised ELAAP document Figure 11.1 no longer shows this proposed route. References to the proposed route have been removed from the text in Section 11.4 and policy EL22.
14	C	North London Waste Authority	Para 8.1.4	Unsound	The reference to 205 jobs on the EcoPark site is too specific and overstated as it includes LondonWaste Ltd staff at other sites. Replace the reference to '250 jobs' with 'around 200 jobs'.	The revised ELAAP document paragraph 8.1.4 references around 200 jobs.
14	D	North London Waste Authority	Next to Figure 8.1	Unsound	This photograph has no title and isn't very relevant to the EcoPark site. It could cause confusion regarding what it is showing. Replace with a photo of the EcoPark – NLWA can	The revised ELAAP document does not show this image.

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					supply an up-to-date image.	
14	E	North London Waste Authority	Section 8.1	Unsound	<p>Whilst there is a reference to the upgrade for Deephams STW in para 9.1.3 catering for population growth, Section 8.1 should have a similar reference for the EcoPark.</p> <p>Include a reference in Section 8.1 to the rising population of the area and the need for the EcoPark to cater for this increase in wording similar to that in Para 9.1.3.</p>	The revised ELAAP document policy EL17 references meeting the waste management needs of north London's residents.
14	F	North London Waste Authority	Para 11.5.2	Unsound	Refers to the transport of Solid Recovered Fuel (SRF) by water. The NLWA is no longer proposing to produce SRF from residual waste so this reference is out-of-date and its inclusion is incorrect and misleading. Remove the second sentence within para 11.5.2 which refers to the out-of-date study on waste by water transport.	The revised ELAAP document has removed reference to SRF.
14	G	North London Waste Authority	Chapter 12	Unsound	The photo at the start of Chapter 12 includes an out-of-date caption. The caption should read 'Biffa' not 'Greenstar'.	The revised ELAAP document captions this photo as 'recycling plant'.
14	H	North London Waste Authority	Para 14.3.1	Unsound	Section 14.2 refers to LBE setting up a CLAAP Officer Working Group - the NLWA is supportive of this. However, para 14.3.1 also makes reference to the Enfield Leaside Partnership, the board for which no longer exists. Clarify whether this should be referring to the new South East Enfield Partnership Board and update if required.	The revised ELAAP document refers to the South East Enfield Partnership Board and not the Enfield Leaside Partnership.
14	I	North London Waste Authority	Table 14.1	Unsound	The table includes a helpful list of priority AAP projects but the NLWA proposals for replacing the existing energy from waste facility at the EcoPark are not included.	Table 14.1 of the revised ELAAP document incorporating the text proposed by the NLWA.

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					Table 14.1 could be usefully updated to include a bullet point on the NLWAs proposals for the EcoPark, specifically the fact that the NLWA is seeking a Development Consent Order to build an Energy Recover Facility to replace the existing plant. In addition the NLWA is proposing replacement facilities associated with waste management and a new Reuse and Recycling Centre for local residents and businesses as well as a visitor centre.	
15	A	Canal & River Trust - Russell Butchers	General		The C&RT supports the principle of the proposed Central Leaside AAP and have been involved in the plans ongoing development. The AAP will help to ensure that the growth and development of the Central Leaside Area is managed in a holistic and sustainable manner and it will help to activate and enhance the waterway.	Comment noted. No further action necessary.
15	B	Canal & River Trust	General		The C&RT maintains its position that new bridges across the waterway can exacerbate issues relating to anti-social behaviour, maintenance and overshadowing of the towpath. Any additional bridges will need to be fully justified. The Trust is committed to work with the relevant parties to address these issues and will support new bridges where these are appropriately located and justified and subject to a commercial agreement.	The C&RT will be consulted during development of any proposals which involve bridging the waterways within the ELAAP area.
15	C	Canal & River Trust	CL 16, page 71		The Canal & River Trust is referred to as the Canal & Rivers Trust, which needs to be corrected.	The references have been amended in the revised ELAAP.
15	D	Canal & River Trust	Para 14.3.3 and page 155		Delete the bracketed reference to British Waterways. The Canal & River Trust was established in 2012 and references to British Waterways are no longer considered to be necessary.	The references have been amended in the revised ELAAP.
15	E	Canal & River	Numerous		There is inconsistency with the naming of the River Lee	The references have been

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
		Trust	locations		<p>Navigation throughout the document. In some places it is referred to as the Lee Navigation and it is also referred to as the Lee Navigation Canal and the Lee Valley Navigation. The correct name is the River Lee Navigation and this requires correcting at the following locations:</p> <ul style="list-style-type: none"> • Page 44 – Part 5.4.26 • Page 44 – Part 5.4.27 (refers to the Lee Navigation Canal) • Page 45 – Part 5.4.27 • Page 46 – Policy CL8 • Page 47 – Part 5.4.31 • Page 62 – Part 5.6.33 • Page 71 – Policy CL16 • Page 101 – Part 8.2.1 • Page 127 – Policy CL28 (refers to the Lee Valley Navigation) • Page 133 – Part 12.1.7 	amended in the revised ELAAP.
16	A	GVA (on behalf of LaSalle Investment Management) - Contact: Lorraine Hughes	Paras 2.1.6, 5.19,	Unsound	<p>Reference to 3,000 new jobs in Meridian Water is not consistent with Core Policies 37 and 38, both of which allocate 1,500 new jobs to Meridian Water. Also, it is inconsistent with other references in the draft AAP which refer to 3,000 new jobs across the whole CLAAP area (e.g. 1.1.3, Objective 2, 4.1.1, 5.1.2).</p> <p>No justification of why the jobs target may have been changed or how, if 3,000 does apply to Meridian Water only, this is achievable and how it relates to the land allocations. The reference to 3,000 new jobs in Meridian Water is not supported by evidence. Target employment densities within the SIL areas</p>	The revised ELAAP establishes a comprehensive approach to regeneration at Meridian Water, which optimises land use and seeks over 6,000 new jobs. The case for this is set out most clearly in Section 5.4 Economy and Employment, and policy EL2. Restrictive industrial land designations are being removed to enable a flexible approach to

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>will need to be reflective of the types of uses that are supported in these designations and the employment densities that are reasonable for these uses.</p> <p>The analysis and calculations in GVA's Stonehill Market and Socio Economic Report (July 2014) remain the most up to date and transparent assessment of existing employment and future uplift.</p> <p>Suggest updating the reference to 1,500 new jobs in Meridian Water to make consistent with policy.</p>	<p>workspaces and jobs creation. The increase in job numbers from the Core Strategy reflects the changes which have taken place since. These include a rising borough population and greater quantum of housing at Meridian Water increasing the requirement for more jobs. Worsening deprivation in the east of the borough can in part be addressed by a higher number and a better quality of jobs.</p>
16	B	GVA (on behalf of LIM)	Para 5.3.2	Not stated	<p>It is Core Strategy Policy 38 that establishes that the required infrastructure included "A new spine running through the area, connecting all parts of Meridian Water, linking new and existing communities, the station and the Lee Valley Regional Park". The Meridian Water Masterplan (MWM) does not therefore establish the Causeway as a strategic link. The MWM is a guidance document that carries limited weight in the making of planning decisions and therefore the establishment of the route is set in the Core Strategy.</p> <p>The AAP should refer to Core Strategy Policy 38.</p>	<p>The revised ELAAP establishes a Causeway route based upon carefully prepared evidence, as set out in Section 5.8 of the AAP. The Causeway is vital to connecting Meridian Water together as a coherent entity, and enabling connectivity with the wider area. It is therefore vital to the viability of the Meridian Water regeneration.</p>
16	C	GVA (on behalf of LIM)	Para 5.3.4 Figure 5.1	Unsound	<p>The character of the route must be appropriate to the land uses through which the route runs. The route shown in Figure 5.1 runs through the centre of land designated as SIL. The design aspirations described in this paragraph are not consistent with</p>	<p>The revised ELAAP establishes a comprehensive approach to regeneration at Meridian Water, which optimises land use.</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>the role and function and acceptable uses within SIL, as set out in Paragraph 2.79 of the London Plan – in particular, the requirements for attractiveness, public spaces, squares, shopping centres and priority for pedestrians and cyclists.</p> <p>Suggest including details stating that the route should not compromise the SIL designation.</p>	Restrictive industrial land designations (SIL) are being removed to enable a flexible approach to regenerating the entire site. The uses along the Causeway can therefore be appropriate to the location and achieving a high quality of public realm and optimising use types.
16	D	GVA (on behalf of LIM)	CL1 Figure 5.1 Figure 5.3		<p>The safeguarding of the specific route shown in Figure 5.1 is not justified. No discussion of alternatives is considered, either in Submission CLAAP or Sustainability Appraisal. There is no evidence to show that alternatives have been considered and that consideration demonstrates that they are less appropriate. Alternative routes have been demonstrated to achieve the key objectives without requiring the delivery of the Causeway on the specific route shown (Appendix 1 – Planit Urban Design Policy Compliance Review Addendum Dec 2014).</p> <p>The proposed route through the SIL could place unnecessary restrictions on the use of strategic industrial land – in conflict with London Plan Policy 2.17, Core Policy 14 and DMD19.</p> <p>The Causeway should respond to objectives in Core Policy 38, which provides no reference to a specific route or the need for a square. In particular, the current option runs through designated SIL which is not considered best located for connecting</p>	<p>The revised ELAAP establishes a Causeway route based upon carefully prepared evidence, as set out in Section 5.8 of the AAP. The Causeway is vital to connecting Meridian Water together as a coherent entity, and enabling connectivity with the wider area. It is therefore vital to the viability of the Meridian Water regeneration.</p> <p>Core Policy 38 established the needs for a Causeway route, with more detailed routing to be completed at a later date, as has been the case.</p> <p>The revised ELAAP establishes a</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>communities (CP38).</p> <p>Requirement for a square of the scale proposed is not justified by evidence. GVA question whether a public square within industrial use area would be appropriate due to the potential lack of public activity and ground floor mixed uses.</p> <p>The feasibility of constructing the Causeway bridge in this location that ensures a minimum waterway width of 5.69m and a minimum air draft of 2.45m at all points in order to maintain its navigability has not been demonstrated.</p> <p>Inconsistency between the cross section (Figure 4-6 of MWM), which shows the route lined with 5-6 storey buildings with mixed use ground floor along both sides, and the proposed Causeway route between SIL and Industrial Business Parks (IBP) (CLAAP Figure 5.3). Industrial uses associated with the SIL in particular would not lend themselves to this.</p> <p>The draft policy states “The Causeway should be navigable along its entire length by pedestrians and cyclists, with clear, safe and direct pedestrian and cycle provision”. The draft policy does not state that the route is required to be used by buses. Policy CL1 states that “Development proposals should refer to the typical cross-section as set out in the Meridian Water Masterplan”. However, this contradicts Figure 4-6 ‘Causeway Section’ of the Meridian Water Masterplan, which suggests the Causeway</p>	<p>comprehensive approach to regeneration at Meridian Water, which optimises land use. Restrictive industrial land designations (SIL) are being removed to enable a flexible approach to regenerating the entire site. The uses along the Causeway can therefore be appropriate to the location and achieving a high quality of public realm and optimising use types.</p> <p>Detailed design work on the bridge does not need to be carried out for the AAP, and will be undertaken as the plans for Meridian Water are progressed.</p> <p>Policy EL6 states that ‘<i>The Causeway should be accessible by vehicular traffic between Glover Drive in the west and Harbet Road in the east</i>’.</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>should provide two-way bus priority lanes and a two-way private vehicle lane. The Submission CLAAP is inconsistent and is unclear as to the nature of the route such that further clarity on the desired form of the Causeway route and bridge is required as well as specific details of the forms of appropriate uses along it.</p> <p>Suggest no safeguard specific route in the AAP, and undertake assessment of alternatives and provide evidence.</p>	
16	E	GVA (on behalf of LIM)	Para 5.4.12 Table 5.1	Unsound Not legally compliant	<p>Allocation of 1,100 -1,200 new homes in 'Meridian East' is not justified by evidence and is not consistent with London Plan policy. The area is designated as SIL and the introduction of adjacent uses should not compromise integrity of effectiveness of designated industrial land (London Plan Policy 2.17).</p> <p>Suggest removing housing allocations from Meridian East neighbourhood.</p>	The increased and growing need for housing in London and Enfield is well evidenced. The revised ELAAP removes restrictive industrial land designations (SIL) to enable a flexible approach to regenerating the entire site. As demonstrated by the evidence base, to achieve the quantum of development within the Meridian Water boundary requires removal of the SIL designation and significant delivery of residential units to the east of the River Lee Navigation.
16	F	GVA (on behalf of LIM)	CL2 CL7	Unsound Not legally compliant	The requirement for higher densities than London Plan has not been justified in this instance as the Submission CLAAP is not supported by evidence that demonstrates that the required level of housing is deliverable alongside the other land uses (existing	London Plan policy 2.13 'Opportunity Area and Intensification Areas', of which Edmonton Leaside falls under the

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					and SIL) in this location. Not consistent with Policy 2.17 of London Plan – adjacent uses should not compromise integrity of effectiveness of designated industrial land.	Upper Lee Valley Opportunity Area, <i>'seek to optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth, and, where appropriate, contain a mix of uses'</i> . The revised ELAAP removes restrictive the SIL designations to support regeneration across the entire site. Mixed use types will be enabled to operate effectively within the area.
16	G	GVA (on behalf of LIM)	CL3, Part B	Unsound Not legally compliant	<p>"Given the mixture of uses envisaged within the new neighbourhoods, new development will be expected to be high quality and innovative design, which will provide an attractive place to work....Incorporation of public realm improvements and strong boundaries around edges to create safe and secure places in accordance with DMD27".</p> <p>The nature of how this could be applied in Meridian East, which largely remains in industrial use, has not been fully considered and requires a different design response to more comprehensively mixed use areas.</p>	<p>The revised ELAAP removes restrictive the SIL designations to support regeneration across the entire site. Mixed use types will be enabled to operate effectively within the area.</p> <p>The design principles are established in the ELAAP, in particular by policies EL10 (Urban Grain), EL11 (Building Form) and EL12 (Public Realm).</p>
16	H	GVA (on behalf of LIM)	CL8	Unsound Not legally	Changes to the SIL boundary are not justified and not the most appropriate strategy. The evidence base does not support the	The revised ELAAP establishes a comprehensive approach to

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
				compliant	<p>loss of SIL, or the re-designation from PIL to IBP (discussed further against Policy CL10).</p> <p>The categorisation of SIL as either PIL or IBP is a designation approach which facilitates and focuses on particular uses within SIL designated land, rather than a restrictive designation which prevents the presence of certain uses (i.e. B8). IBP designated land may be focussed towards uses with lower environmental impacts such as activities typically including B1b, B1c and B2 uses, however, it is still considered SIL designated land and therefore does not prevent the accommodation of B1, B2 and B8 uses.</p> <p>Whilst the policy can 'promote' certain uses as a SIL designation it cannot exclude any use that is deemed to be compatible with the SIL designation. Therefore the policies should not provide a basis for preventing B8 to come forward if there is demonstrable demand. GVA understand that this would apply to both Harbet Road Industrial Estate regeneration to the south of the Causeway in SIL IBP or to the north of the Causeway in SIL PIL.</p> <p>The proposals are inconsistent with the London Plan (2011) as highlighted in Paragraph 2.80 "SILs are given strategic protection because their scale and relatively homogenous character means they can accommodate activities which elsewhere might raise tensions with other land uses". Additionally, Policy 2.17 of the London Plan specifically states that "Development proposals</p>	<p>regeneration at Meridian Water, which optimises land use. The case for this is set out clearly in Section 5.4 Economy and Employment, and policy EL2. Restrictive industrial land designations are being removed to enable a flexible approach to workspaces and jobs creation. The approach of mixed land uses is also required to meet the level of growth in housing and supporting services. As such the position of the AAP has moved on significantly from when these comments were made. It should also be noted that the absence of an industrial land designation does not preclude the operation of industrial sectors within the B2 and B8 uses.</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial type activities”.</p> <p>The proposals on changes to the SIL boundary and PIL/IBP designations are based on the vision in the MWM and do not originate from any evidence base, which is contrary to London Plan paragraphs 2.83 and Policy 4.4, that such changes should be based on local and strategic assessment of supply and demand.</p> <p>There is no justifiable evidence produced by the Council for a reduction in demand for PIL uses in this location as there is acknowledgement of the strength of the Enfield market for logistics made in their own evidence base supporting the Submission CLAAP, particularly the Enfield Industrial Estates Strategy 2014 and the Enfield Employment Land Review 2012.</p> <p>The introduction of a new public square would reduce the land within the SIL available for industrial uses, compromising the SIL and the deliverable employment densities, and is not consistent with London Plan Policy 2.17 or DMD19.</p> <p>The AAP seeks to introduce an Industrial Business Park (IBP) to the south of the Causeway and a Preferred Industrial Location (PIL) to the north of the Causeway (Fig 5.3). GVA question whether tying the alignment of the spine route to this boundary between IBP and PIL land would achieve the Council’s desired</p>	

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>objective of ‘becoming and focal point of public life’ (objective 3, page 7), given the limited for potential for mixed uses and vitality in the public realm – which is more likely to be realised if the spine route is located further south where business or residential uses could provide better active frontage (notwithstanding previous comments relating to concerns regarding residential uses in this location).</p> <p>Suggest retaining the industrial designation as PIL as supported by the evidence base. Remove references to integration of residential.</p>	
16	I	GVA (on behalf of LIM)	5.5.2	Unsound Not legally compliant	<p>Reference to industrial uses being compatible with emerging residential neighbourhoods is not consistent with Policy 2.17 of London Plan – adjacent uses should not compromise integrity of effectiveness of designated industrial land, not the other way around.</p> <p>Suggest removing residential designation from Harbet Road Industrial Estate. Emphasise that neighbouring uses should not compromise SIL uses.</p>	The increased and growing need for housing in London and Enfield is well evidenced. The revised ELAAP removes restrictive industrial land designations (SIL) to enable a flexible approach to regenerating the entire site. As demonstrated by the evidence base, to achieve the quantum of development within the Meridian Water boundary requires removal of the SIL designation and significant delivery of residential units to the east of the River Lee Navigation.
16	J	GVA (on	Para 5.5.10	Unsound	This is not effective as there is no mention of working with	The revised approach to the Harbet

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
		behalf of LIM)			landowners. Suggest including reference to working with landowners.	Road area in the ELAAP is as a mixed use area rather than exclusively industrial uses, and as such this paragraph has been removed. The Council will work with partners, which includes landowners, to support regeneration.
16	K	GVA (on behalf of LIM)	Para 5.5.11	Unsound	Should be made clear that encouragement of creative industries and business start-ups is not at the expense of the wide spectrum of industrial uses that the SIL designation is seeking (London Plan 2.79 and DMD19).	As referenced in previous responses, the Council is seeking to remove the SIL designation. There is a need to encourage growing businesses in high-value sectors, which is set out in policy EL2 Economy and Employment.
16	L	GVA (on behalf of LIM)	CL8, CL10, CL20 Figure 5.3 Paras: 5.5.4, 5.5.6, 5.5.7, 5.5.8, 5.5.9, 6.3.17, 6.4.1	Unsound Not legally compliant	Not justified: The de-designation of 4.5 hectares of SIL is not supported by evidence, and facilitating housing delivery does not justify such a loss. SIL designations should be made on the basis of an assessment of strategic and local supply and demand – London Plan 2.83 and Policy 4.4. The strength of the logistics market is not recognised in the AAP, when identifying aims to “achieve a shift in its economic base away from traditional industrial areas...” (para 5.5.7) and focus on the provision of smaller business units (CL10).	The revised ELAAP removes all restrictive industrial land designations (SIL) within the Meridian Water boundary to enable a flexible approach to regenerating the entire site. The evidence base establishes both the need and opportunity to locate a range of high-value adding growth sectors which will support the economy and generate greater levels of employment. This

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>The strength of the Enfield market for logistics is acknowledged in the evidence base supporting the AAP, particularly the Industrial Estates Strategy 2014 and the Enfield Employment Land Review 2012, but this is not carried through into the AAP's approach. This fails to acknowledge the particular market opportunity in the sector through direct access to the North Circular in terms of servicing Central London.</p> <p>An absence of justification of the economic strategy promoted within Policy CL10 and Section 5.5, given that it does not recognise the strength of the logistics market. In particular the ELR (2012) states that Enfield projects a continuation of growth in demand for distribution and logistics use.</p> <p>The IBP designation is not fully justified or supported with evidence of future demand for the uses identified. Whilst the Employment Land Study and Industrial Estates Strategy both highlight the changing economy in Enfield neither identify Harbet Road as a location particularly suited to a different type of activity. Indeed, both documents suggest that further work is needed to define the offer within Meridian Water to align the policy-led regeneration of the area to economic opportunity.</p> <p>The emphasis is on shifting the economic base to fulfil a Masterplan vision rather than basing the development plan on evidence as required by London Plan paragraph 2.83 and Policy 4.4 – should be based on local and strategic assessment of</p>	<p>approach is most clearly set out in Section 5.4 Economy and Employment, and policy EL2.</p> <p>London Plan policy 2.13 'Opportunity Area and Intensification Areas', of which Central Leaside falls under the Upper Lee Valley Opportunity Area, <i>'seek to optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth, and, where appropriate, contain a mix of uses'</i>.</p> <p>The AAP is consistent with London Plan Policy 4.4 which states that boroughs should work with the Mayor to <i>'plan, monitor and manage release of surplus industrial land ... so that it can contribute to strategic and local planning objectives, especially those to provide more housing, and, in appropriate locations, to provide social infrastructure.'</i></p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>supply and demand. This approaches the matter in the wrong way.</p> <p>The intention to facilitate significant change in the business and employment offer is not based upon the Council's own evidence base and is therefore not justified as the most appropriate strategy, based on proportionate evidence.</p> <p>It is not justified to restrict Harbet Road to smaller occupiers. Demand remains for large units as demonstrated by the Council's own evidence. Land designated as SIL offers opportunities for smaller occupiers to come forward, but this should not prevent large units also being delivered, for which there is an established demand.</p> <p>Not effective: Only protecting the area of SIL shown in Figure 5.3 results in a loss of SIL, and crucially a loss of SIL in one consolidated location. The scale of SILs is critical in being able to fulfil its role to meet strategic needs. A loss of SIL in this location does not align with guidance in the GLA Land for Industry and Transport SPG (2012), which highlights the fundamental strength of SIL as its scale and critical mass.</p> <p>Not consistent: London Plan Policy 2.79 and DMD19 do not restrict type of uses within IBPs to just B1a, B1b, and B1c. (also inconsistent with</p>	<p>In appropriate locations in the borough the Council supports the development of distribution and logistics uses, and does not contest the demand for such use types, with major new facilities brought forward in industrial estates such as Brimsdown in recent years. However, the regionally significant regeneration of Meridian Water does not provide a suitable location for logistics uses, unless fully integrated as part of a comprehensive, multi-use approach to the area.</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>reference to B1b), B1c and B2 in CL10).</p> <p>CL10 indicates that “The proposed IBP will promote, B1(a), B1(b) and B1(c)...”, and that “The remaining areas of PIL will encourage B1(c) and B2 uses....”. Whilst the policy can ‘promote’ and ‘encourage’ certain uses, as a SIL designation it cannot exclude any use that is deemed to be compatible with the SIL designation. Therefore the policies should not provide a basis for preventing B2 and B8 uses to come forward if there is demonstrable demand. The omission of B8 is also not supported by evidence as there is acknowledged strong demand for it in this location.</p> <p>Reference to PIL uses not compromising other activities is not consistent with role of PIL as set out in London Plan Policy 2.17. Adjacent uses should not compromise integrity of effectiveness of designated industrial land – not the other way round. Intensification of use is supported – but it should be clear that this is within the established designation.</p> <p>Suggest:</p> <ul style="list-style-type: none"> • Retention of PIL in accordance with evidence base. • Inclusion of B8 uses within the uses encouraged within PIL. • Add Policy DMD19 to the list of policies that it should be read in conjunction with. 	
16	M	GVA (on	CL17	Unsound	Not effective to require outline applications for the entire	Policy EL13 has revised wording

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
		behalf of LIM)			<p>'neighbourhoods' identified in Figure 5.2. These are in a number of different ownerships and it is overly restrictive to prevent individual applications, either outline or detailed, coming forward within these areas.</p> <p>Suggest: Delete "The Council will require outline applications to be submitted for each neighbourhood area indicated on Figure 5.2 and detailed in Table 5.1 and policies CL3, CL5, CL6, CL7 and CL8".</p>	<p>which set out that '<i>For each phase/ zone of development in Meridian Water the developer must agree with the Council an outline application which includes the infrastructure needs to support the level of development within the identified phase/ zone...</i>'. The approach provides flexibility over the area of the phase/ zone for which the planning obligations are to be agreed.</p>
16	N	GVA (on behalf of LIM)	Para 6.1.2	Not stated	Should reference appropriate uses within SIL in accordance with the London Plan.	The revised ELAAP removes all SIL designation within Meridian Water, for reasons detailed in previous responses.
16	O	GVA (on behalf of LIM)	Paras 6.1.5, 6.3.4, 6.4.13	Unsound	<p>Reference to net additional 3,000 jobs across Central Leaside over the life of the AAP is inconsistent with paras 2.1.6 and 5.1.9 with regards to job numbers to be created in either the whole AAP area or just Meridian Water.</p> <p>Also, para 6.1.5 conflicts with para 6.1.5 as it is implied that the delivery of 3,000 net additional jobs would be delivered in existing industrial estates whereas 6.1.5 states that retail, leisure, education and community uses also contribute towards the job creation target.</p>	The revised ELAAP seeks and supports jobs growth in the Edmonton Leaside area beyond Meridian Water. However, a jobs figure is not referenced.

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>Para 6.4.13 conflicts between attributing 3,000 new jobs to Meridian Water whereas Paragraphs 6.1.5 and 6.3.4 attribute this target to the whole AAP area</p> <p>Suggest: Clarify that existing industrial estates are there to contribute to the overall target of 3,000 net additional jobs.</p>	
16	P	GVA (on behalf of LIM)	Para 6.3.12, 6.3.13	Unsound	<p>Job figure should be based on what can be achieved with reference to evidence of strategic and local demand.</p> <p>Intensification must be based on evidence to be deliverable. Suggest: Provide evidence to demonstrate proposed employment generation figures</p>	Supported by the ELAAP, an increase in jobs is realisable, driven by redevelopment and intensification of the area's industrial estates, including at the Council-owned Claverings and Montague Industrial Estates where investment can improve outdated infrastructure.
16	Q	GVA (on behalf of LIM)	Para 6.3.14	Unsound	<p>The re-designation is led by job target, not by evidence that there is demand for these types of uses (as discussed under Policy CL8 & CL10 commentary).</p> <p>The evidence base documents supporting the AAP acknowledge the strength of the Enfield logistics market, particularly the Industrial Estates Strategy 2014 and Employment Land Review 2012, but this is not carried through into the AAP's approach which seeks to move away from 'traditional' areas.</p> <p>There is an absence of justification of the economic strategy promoted. The strategy promoted is also contradictory to Para</p>	<p>The revised ELAAP addresses jobs growth in Meridian Water in Policy EL2, which is discussed in the response to item A above.</p> <p>There is a need to create more jobs in the borough, particularly in the eastern area, to address higher levels of unemployment and deprivation, and lower incomes. Policy EL15 is based upon this driver, and the requirement for</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>6.4.12 of the AAP which states that “broad economic drivers would suggest demand for industrial land and premises in Enfield is likely to remain strong over the coming years”. . . “The continued safeguarding and management of this SIL could potentially accommodate the types of logistics and distribution companies that require appropriate sites, premises and infrastructure to accommodate future growth”.</p> <p>Suggest: Recognise the strength of the logistics sector and promote B8 uses within the SIL. This would then re-inform the document on appropriate employment generation.</p>	renewal across the Edmonton Leaside area.
16	R	GVA (on behalf of LIM)	Para 6.3.15	Unsound Not legally compliant	<p>Lack of evidence to suggest that market trends and demands can lead to assumed uplifts in job creation to 3,134 jobs.</p> <p>No further evidence of assessment of how jobs will be delivered is contained within the AAP or its evidence base. The analysis and calculations in GVA’s Stonehill Market and Socio Economic Report (July 2014) remains the most up to date and transparent assessment of existing employment and future uplift.</p> <p>Suggest: Provide evidence to demonstrate proposed employment generation figures.</p>	The evidence base prepared for the revised ELAAP sets out how Meridian Water can achieve over 6,000 new jobs, supported by policy EL2. In the wider AAP area, the ELAAP supports an increase in jobs, driven by redevelopment and intensification of the area’s industrial estates, including at the Council-owned Claverings and Montague Industrial Estates where investment can improve outdated infrastructure.
16	S	GVA (on behalf of LIM)	Para 6.4.5	Unsound	Reference to intensification of industrial areas should be based on evidence.	An increase in jobs is realisable, driven by redevelopment and

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
						intensification of the area's industrial estates, including at the Council-owned Claverings and Montague Industrial Estates where investment can improve outdated infrastructure. Policy EL15 supports this approach.
16	T	GVA (on behalf of LIM)	CL18 Table 6.2 Para 6.4.2	Unsound Not legally compliant	<p>The Submission CLAAP identifies 4.5ha of Harbet Road SIL release and new SIL PIL identification to re-provide this released land. The released SIL land is not re-provided like for like. Its division into two separate land parcels means that it is not providing the type of land required to match the demand and the uses provided on the 4.5ha SIL section. It does not align with guidance in the Land for Industry and Transport SPG (2012), which highlights the fundamental strength of SIL as its scale and critical mass.</p> <p>The two new SIL sites do not provide a scale or configuration of land that allows for the full range of SIL uses to be delivered. As narrow strips they limit the type of buildings that can be accommodated to a scale much lower than the Harbet Road area can currently accommodate.</p> <p>Furthermore, the largest single SIL addition lies within the Deephams Water Treatment Works site which the CLAAP itself recognises as providing longer term opportunities for expansion of the facility. It is therefore questionable how 'available' this</p>	<p>The revised ELAAP removes all restrictive industrial land designations (SIL) within the Meridian Water boundary to enable a flexible approach to regenerating the entire site. The evidence base establishes both the need and opportunity to locate a range of high-value adding growth sectors which will support the economy and generate greater levels of employment. This approach is set out in Section 5.4 and policy EL2 of the ELAAP. The de-designation of industrial land within Meridian Water is therefore not dependent on re-providing elsewhere.</p> <p>The northwards extension of SIL will provide a natural extension to</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>land really is to other occupiers. At best it provides a 'temporary' reserve of SIL, which will not be attractive to most industrial occupiers</p> <p>As such, with a lack of a proportionate evidence base provided to underpin these recommendations, there is no certainty that these sites can be developed to make a significant contribution to offsetting the proposed loss of employment land on the Harbert Road Industrial Area. The existing Harbet Road site contributes to making up a much larger mass of development land that can offer flexibility to accommodate a variety of employment types and sizes. This is not the case of the replacement plots.</p>	the existing block of SIL which covers industrial estates to the south, providing a good basis for the future management and sustainability of the designated areas. The inclusion of Deephams STW is valid under the London Plan (section 2.79) as a utility. The ELAAP does not expect other industrial uses on the Deephams STW site.
16	U	GVA (on behalf of LIM)	CL27	Unsound	Reference to Policy CL1. Policy CL1 is unsound for the reasons set out above.	See response to item D above.
16	V	GVA (on behalf of LIM)	Fig 12.1	Unsound	The indicative route for the Lee Valley Heat Network follows the proposed Causeway route set out in Policy CL1. Policy CL1 is unsound for the reasons set out above.	See response to item D above.
16	W	GVA (on behalf of LIM)	Section 14.3		<p>There is no mention that the Council will work in partnership with landowners.</p> <p>Suggest: Include paragraph to ensure the Council works with land owners for the delivery of the plan.</p>	Paragraph 14.6.6 refers to close working between the London Borough of Enfield and landowners and developers. Paragraphs 14.2.5 – 12.2.8 discusses the Council's approach to landownership at Meridian Water.
16	X	GVA (on	Para 14.9.1	Unsound	The life of the Submission CLAAP is unclear. The long term	The revised ELAAP amends these

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
		behalf of LIM)			projects are described as being delivered 2027 – 2035, whereas Section 1.1 in the Plan and its Context chapter suggested that the life of the plan is up to 2032. This further undermines employment delivery targets as it is not clear what life span of the document has been used to calculate these targets. Suggest: Clarify life of the plan.	references and removes the 2035 date. The ELAAP references 2032; for example in the vision.
17	A	Dalton Warner Davis (on behalf of IKEA Properties Investment Ltd) – Sally Miles			IKEA has expressed its desire to support the proposals in principle. However, it is considered that insufficient consideration has been given to the potential impact that these proposals could have upon the Store's operation.	Comment noted – the detailed items of the impact are responded to below.
17	B	DWD (for IKEA)			For IKEA it is a design mandate that customers arriving by any mode of travel have visibility of the front entrance. Maintaining car and pedestrian access from Glover Drive is considered vital.	Glover Drive will become part of the Causeway route, which will be useable by cars. The AAP otherwise provides only indicative connectivity plans.
17	C	DWD (for IKEA)			Accessibility The Masterplan identifies two new public squares to be provided within the immediate vicinity of the Store: 'Gateway Square' at the western end of Glover Drive and at the current eastern end of Glover Drive it is proposed to implement 'Central Square', which would act as a community hub, including markets, concerts and other temporary events.	The ELAAP provides for town centre uses and public realm along the Causeway; it does not include the public squares of the 2013 Meridian Water Masterplan.

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>The proposed public squares as described in the AAP would have a significant detrimental impact on the access and servicing of the Store and seem to suggest that the main vehicular access to the Store car park is to be relocated to the south (rear) of the site, to Leaside Road, along with the access to the service yard. Altogether, this would have a series of negative effects on the Store's operation:</p> <ul style="list-style-type: none"> • It is an essential part of the IKEA concept and design that customers approach the Store from the front so as to identify the Store entrance clearly and comply with the mandatory customer flow design of the Store. Access from the rear of the store would not accomplish this and could have serious impact on the operation and layout of the Store. • It would potentially lead to a rearrangement of the entire existing car park layout to face an access/egress off Leaside Road • IKEA has a unique format and configuration. Relationship between car parks and the store's entrance is essential, particularly having regard to the nature of the products, customer movements, etc. • General 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 nearly at capacity junctions along Montagu Road and Conduit Lane. 	<p>The evidence modelling work which tested the quantum of development at Meridian Water assumes a reconfiguration of parking at the existing retail stores - including IKEA. The AAP provides the defined Causeway route, while connectivity plans are indicative only.</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<ul style="list-style-type: none"> Approximately 770 home deliveries are made per week, reducing the number of customer vehicle trips to the Store, hence minimising congestion in the surrounding highway network and pollution. The Masterplan proposals would mean home deliveries also sharing the main vehicular access off Leaside Road, compromising this operation. Servicing to the Store, which is predominantly carried out via articulated lorries of approximately 16.5m in length, would also be significantly compromised as it appears that the proposed road configuration would be unable to accommodate these vehicles. These vehicles currently access the Store site via the North Circular Road and Argon Road and, as this access route is lost, they would be forced to navigate the surrounding road network. <p>This preferred route could be indicative, however, alternative proposals may be more acceptable, particularly in the immediate vicinity of the Store. It is imperative that the main vehicular accesses to the Store (off Argon Road and Glover Drive) are retained to prevent this from prejudicing the continued successful operation of the Store and to ensure that Store entrance is identified clearly from the car park access.</p>	
17	D	DWD (for IKEA)			Highway Capacity The Causeway Phase 2 comprising the section from the roundabout fronting the Store's entrance to the River Lee Navigation and consisting of a single carriageway road with	The revised ELAAP shows the detailed Causeway plan at Figure 5.1, providing for a 32m wide

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>dedicated footway / cycleway and one lane per direction of traffic. This section will reduce the traffic flow capacity of the existing western section of Glover Road, potentially causing significant delays for customer traffic wishing to access the Store car parks.</p> <p>A review of the junction shown in the plans for Phase 2 suggests that service vehicle tracking would not fit within the carriageway width and no technical work has been provided to date to demonstrate its operation.</p> <p>The AAP presents the Causeway as a 'no through route for vehicles' (Policies CL1 and CL29), which suggests that the main vehicular access to the Store car park (as well as to the service yard) would have to be relocated to the south (rear) of the site, off Leaside Road.</p> <p>The delivery of the Masterplan proposals would add the potential traffic generation of up to 5,000 new homes and 3,000 new jobs to the existing traffic on an already congested network, yet no technical modelling information has been presented that demonstrate the deliverability of the proposals.</p> <p>It is essential that junction capacity assessments, including junction detailed designs and predicted traffic generation flows for the proposed development, are undertaken before the AAP and Masterplan are approved. This is necessary to provide more</p>	<p>corridor in the westerly segments 1 and 2.</p> <p>Policy EL6 allows for vehicular movements along the Causeway, stating that <i>'The Causeway should be accessible by vehicular traffic between Glover Drive in the west and Harbet Road in the east'</i>.</p> <p>The ELAAP supports the improved access which is vital to the successful delivery of Meridian Water and the wider area, including of the road network.</p> <p>Policy EL10 Urban Grain, requires development proposals to <i>'respond to the need for comprehensive, integrated regeneration across the whole of Meridian Water and the surrounding area'</i> and develop a hierarchy-based network of streets.</p> <p>The support for developing a comprehensive road network</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>confidence with regard to the validity of the transport strategy within the Masterplan.</p> <p>Particular attention should be given to the critical junction between the Causeway and proposed access road from Argon Road. This access to the North Circular Road is essential for the continued successful operation of the Store and this junction needs to provide sufficient capacity to accommodate all the required traffic.</p>	<p>design is set out in policy EL25. This policy requires that <i>'the arrangement of streets and places within Meridian Water should be guided by an urban design approach which incorporates sufficient capacity to meet demand'</i>.</p>
17	E	DWD (for IKEA)			<p>Parking</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 current preferred 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 over 360 spaces currently provided in this area to be removed and relocated to the south and west areas of the Store within the site boundary.</p> <p>Although a plan was provided by IKEA showing that these spaces could indeed be relocated within the site, detailed work would 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 evidence modelling work which tested the quantum of development at Meridian Water assumes a reconfiguration of parking at the existing retail stores - including IKEA.</p> <p>Further detailed work will be required for masterplans and development proposals to establish appropriate parking and access.</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
17	F	DWD (for IKEA)			Visibility An essential part of the IKEA concept is that customers approach the Store from the front so as to identify the Store entrance clearly. The Store currently benefits from generally good visibility from every approach/access route. However, the Masterplan proposals show a number of buildings and public squares to be delivered surrounding the Store site, which would obstruct Store visibility from various aspects.	The evidence modelling work which tested the quantum of development at Meridian Water indicates relatively high densities and a building height average of 7-8 storeys. The configuration of urban form across Meridian Water will be established through more detailed masterplans and development proposals. Policy EL11 provides the approach to tall buildings while EL10 addresses urban grain.
17	G	DWD (for IKEA)			Whilst IKEA would support an indicative arrangement, it believes that far greater work is required to demonstrate the final exact route and proposal. IKEA suggests the alternative vehicular routes for development traffic: <ul style="list-style-type: none"> • Glover Drive upgraded to provide a larger traffic capacity and diminish the potential delays created by increases in traffic. • Main vehicular access to the Store retained to the front / north side of the Store, off Glover Drive, so as to maintain the existing store entrance visibility. • Improved signage from the North Circular Road so as to facilitate access from the west and east. • A vehicular route for the Masterplan development traffic could be provided via Leaside Road to the south of the Store, 	See response to item D above.

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					preventing 'through traffic'.	
18	A	Quod (on its own behalf) - John Rhodes	General		Supportive of the regeneration potential of Meridian Water and of the coordinated action which the Council is undertaking to bring forward one of London's most significant regeneration opportunities.	Comment noted. No further action necessary.
18	B	Quod (on its own behalf)			Welcome the Council's proactive approach in seeking to assist in the comprehensive redevelopment of Central Leaside, including Meridian Water. Meridian Water is currently divided into a series of disconnected land uses including IKEA and Tesco, Lee Valley Trading Estate (Harbet Road) and a collection of underused retail and vacant industrial sites in and around Glover Drive, together with underused land to the west of Meridian Way.	Comment noted. No further action necessary.
18	C	Quod (on its own behalf)		Unsound	<p>Flexibility</p> <p>The AAP may be expressed too prescriptively - whilst detail and clarity can be useful, it is very important that the AAP does not impose a rigid blueprint on the area which may become outdated or which may prove not to be viable when it is worked up in detail. The viability work undertaken by the Council to date does not yet provide a sufficiently robust basis to understand the true costs of delivering the opportunity.</p> <p>The site carries a substantial infrastructure burden and it is critical that new development can be consented which is sufficiently valuable to meet those costs.</p> <p>Quod do not believe it is appropriate to fix the AAP as a rigid template for development. A flexible approach is necessary to</p>	The revised ELAAP is based upon a comprehensive range of evidence. The policies have been prepared so as to support and guide development while retaining flexibility.

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					maximise the potential that this land can come forward for high quality new development.	
18	D	Quod (on its own behalf)	CL8, CL10, Figures: 5.3. 6.2 Paras: 5.5.2, 5.5.4		<p>Employment Land</p> <p>It is imperative that the AAP allows for flexibility. There is recognition at both strategic (OAPF) and local policy (Core Strategy) of the need for flexibility and to adopt a holistic approach to the future use of industrial land; however this is not reflected in the AAP. The AAP includes at Policy CL8 and Policy CL10 of the AAP references to a specific quantum of land (14.2 hectares) that will be retained for employment uses. Likewise, Figure 5.3 of the AAP highlights the specific area where SIL that will be released and the boundary of the industrial land to be retained. Such an approach is too prescriptive given the unknowns with regard to viability and the wider objectives for Meridian Water.</p> <p>It is essential for the future success of the opportunity area that the AAP takes a flexible approach to industrial land and employment. The opportunity at Meridian Water, which cannot be replicated at other industrial sites in the Lee Valley, needs to be recognised.</p> <p>For suggested amendments to wording of the AAP see Quod representations document.</p>	The revised ELAAP approach is to provide a far more flexible approach to providing employment space and jobs. Section 5.2 and policy EL2 in particular establish the Councils approach, which includes removal of the SIL designation and the development of mixed-use areas. The objective is to increase economic activity and jobs, particularly in high growth, high value sectors.
18	E	Quod (on its own behalf)	Objective 1, paras:		<p>Residential</p> <p>The AAP should not prescribe detailed outcomes or limitations in</p>	The revised ELAAP provides for a

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
			1.1.1, 2.1.3, 2.1.6, 4.1.1, 5.4.12, 5.8.1, 6.3.17, 6.4.1, 6.4.13 and Table 5.1)		<p>relation to the scale of residential and other development that can be supported within Meridian Water. The AAP currently makes reference to up to 5,000 homes being provided within Meridian Water (including within Objective 1 and in Table 5.1).</p> <p>Both the Meridian Water Masterplan and Core Strategy also recognise the potential for higher density development, particularly close to public transport and along the waterways. Such an approach will reflect market demand and ensure that the full benefits associated with development are maximised.</p> <p>Meridian Water provides the opportunity for higher density development and Quod believe that the scale of development provided should not be unnecessarily restricted by the AAP. The opportunity to provide higher density development is also important in attracting and capitalising on Crossrail 2 services at Meridian Water.</p> <p>For suggested amendments to wording of the AAP see Quod representations document. The text changes include to Objective 1 that <i>'between 5,000 and 10,000 homes will be provided as part of the Meridian Water development'</i>.</p>	<p>higher quantum of housing, based on evidence modelling.</p> <p>Policy EL1 establishes the Councils approach, which includes a stated potential for 10,000 new homes, subject to mix and tenure, sufficient supporting infrastructure, the de-designation of industrial land and the achievement of high quality urban design.</p>
18	F	Quod (on its own behalf)	CL13 Paras: 5.7.4. 5.4.2		<p>Retail</p> <p>The AAP is consistent in identifying that the retail element of any new local centre will be limited to no more than 2,000 sqm. In setting this floorspace figure in the AAP Quod are concerned it</p>	Section 5.5 and policy EL3 establish the ELAAP approach to the new town Centre at Meridian Water. The centre should provide

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>will be applied as a limit to what can be provided and very little justification is provided to support the 2,000 sqm figure.</p> <p>Quod argue that the level of expenditure could support 4,200 sqm (net) of additional convenience goods floorspace and 9,750 sqm (net) of comparison goods floorspace.</p> <p>The AAP should make clear that the 2,000 sqm figure (which should be clear that it refers to additional retail floorspace over and above the existing Tesco and IKEA stores) is indicative and does not represent the maximum level of floorspace that can be provided, subject to the relevant retail policy tests being addressed.</p> <p>See Quod representations document for suggested amendments to wording of the AAP.</p>	<p>primarily for local need, while the floorspace must be in proportion to the level of residential development. There is also a requirement to avoid negative impacts on existing neighbouring centres such as Edmonton Green. The text in the ELAAP indicates that the new local centre floorspace would be net additional to the existing Tesco and IKEA stores and Ravenside Retail Park.</p>
18	G	Quod (on its own behalf)			<p>The AAP is expressed with insufficient flexibility, such that as drafted it would not be a sound plan. This can be demonstrated by reference to the tests of soundness at paragraph 182 of the NPPF.</p> <p>Whilst Quod supports the principles of the AAP it is imperative that the policies are deliverable. At present the lack of flexibility in the AAP means that it has not been sufficiently positively prepared so that it risks the future delivery of this strategically important regeneration area because it may inhibit the ability to</p>	<p>As set out in the responses to items A to F above, the revised ELAAP has been prepared on the basis of an extensive evidence base. The AAP document seeks to provide a clear but flexible approach which meets the overall vision and objective for the area, and for the Council.</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>generate viable solutions.</p> <p>As drafted the AAP is not justified as it fails to provide the most appropriate strategy when considered against the reasonable alternatives of providing greater flexibility to support the de-designation of further industrial land and increased densities.</p> <p>The AAP is not effective as it may not be deliverable if it lacks the flexibility Quod suggest.</p> <p>The AAP is not consistent with national planning policy since the NPPF (paragraph 182) states that a plan should enable the delivery of sustainable development. Given, the lack of flexibility there is concern that the AAP will not deliver viable and sustainable development, particularly given the uncertainty that currently exists around the full costs of land acquisition, infrastructure works and decontamination.</p>	
19	A	NHS England - Sarah Barron / Malcolm Souch			<p>Policy CL15: proposes a new GP surgery within close proximity of new residential areas and located close to a community hub or within the Local Centre. The NHS welcomes the opportunity to continue to work with the Council to understand and monitor the impact and timing of housing and population growth and to explore site options, including the potential for co-location with other services. Other potential locations could include Gateway Square (in the Gateway Neighbourhood) close to the new Angel Station, or Angel Square (in Meridian East Neighbourhood)</p>	<p>Policy EL5 requires healthcare facility floorspace to be provided on the basis of the quantum and mix of housing proposed, and in consultation with the relevant primary healthcare organisations, ensuring delivery of an appropriate and at the right time.</p> <p>The location of the facility must be</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>where a concentration of new housing is proposed.</p> <p>Table 5.1 'Housing Supply in Meridian Water' indicates the range of housing to be provided in each of the five neighbourhoods. In order to estimate the future population yield and profile it will be necessary to understand the likely phasing and mix (dwelling size and affordable/private split) of the new housing.</p> <p>Paragraph 14.6.1 refers to a general pattern of development phasing across the area west to east and the Masterplan indicates that much of the Meridian Central Neighbourhood will be delivered in early phases, with the majority of new housing delivered later. It will be important to ensure that new health infrastructure is provided at the right time, although the flexible use of new space could help to avoid any potential capacity or premises void issues.</p> <p>Welcome the emphasis placed on the need to ensure that the area is well connected to existing neighbouring communities. This includes Edmonton Green and Angel Edmonton to the east and Northumberland Park to the south. Note the aim in paragraph 1.1.1 for Meridian Water to be an inclusive development and a well-integrated extension of Edmonton, where the wider community will share in the new resources and community and health facilities</p> <p>Welcome the provision of The Causeway (Policy CL1: The</p>	<p>easily accessible for all Meridian residents and preferably located in the new town centre or at a community or transport hub.</p> <p>Housing delivery is expected to begin with significant numbers in the westerly sites – the AAP does <u>not</u> indicate that the majority of housing will be delivered in later phases. Will consider rephrasing the AAP text for greater clarity.</p> <p>Comment supporting the AAP's community connectivity is noted.</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>Causeway) which would be a key east-west link running through the development and linking the area to Montagu Road and Edmonton Green. The Causeway would also support healthy and active lifestyles by promoting walking and cycling, linking neighbourhoods to open spaces and fostering social interaction.</p> <p>Note that the existing Edmonton Leaside Partnership will play a key role in delivery of this AAP and the Partnership includes NHS representatives (paragraph 14.3.1).</p> <p>NHS England and Enfield Clinical Commissioning Group recognise the need for a strategic estates solution to the growth in Central Leaside and other regeneration areas in the borough. They are preparing a Strategic Premises Development Plan, which will look at options for new primary care premises in Meridian Water. It will also consider the scope for out of hospital services and locality based health and social care teams, as well as pharmacy provision.</p> <p>NHS England welcome the opportunity to work with the Council to:</p> <ul style="list-style-type: none"> • Assess and monitor the scale and timing of new housing and population growth and the profile of new residents • Assess existing and future health needs in the wider area • Assess the location and capacity of existing health infrastructure • Consider cross-boundary issues with the London Boroughs of Haringey and Waltham Forest, particularly the cumulative 	<p>Comment supporting the AAP's Causeway policy is noted.</p> <p>The relevant group is now the South East Enfield Area Partnership Board (SEEAP).</p> <p>The Council will continue to work with NHS England and Enfield Clinical Commissioning Group to ensure appropriate primary care facilities are developed as part of the Meridian Water regeneration.</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>impact of growth in Central Leaside and in North Tottenham.</p> <ul style="list-style-type: none"> Identify location requirements and develop site options. Consider the potential for existing and shared premises and co-location of services Identify delivery options, costs and affordability, particularly revenue cost implications Consider the use of s106 and CIL funding – it is noted that the Council is currently consulting on its CIL draft Regulation 123 List. 	Enfield's CIL S123 list came into effect in April 2016.
20	A	GLA – Stewart Murray	General		The Proposed Submission Central Leaside Area Action Plan is in general conformity with the London Plan.	Comment noted. No further action necessary.
20	B	GLA	Vision and Objectives		The stated vision and objectives for the Central Leaside area and in particular the Meridian Water Regeneration Area are supported in line with the London Plan, the Upper Lee Valley Opportunity Area Planning Framework and the Meridian Water Masterplan. The Upper Lee Valley offers an opportunity to provide significant jobs and living space to support London's continued growth. It is essential that strategic and local plans are as closely aligned as possible in order to realise this ambition.	Comment noted. No further action necessary.
20	C	GLA	Para 5.4.3		The proposed Housing Zone at Meridian Water is also expected to boost housing delivery, reflecting the continuing growth of London's population. Consequently, the GLA would recommend that the AAP allows for more comprehensive, evidence based reviews, to take account of these influences, going beyond the usual cycle of monitoring and review stated in Section 14.8.	The revised ELAAP is informed by evidence-base modelling which provides for a higher quantum of higher at Meridian Water than in the 2014 AAP document.

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
20	D	GLA	Section 5		The introductory text to Section 5, concerning Meridian Water, recognises that the potential for transformation and change is enormous; however it is recommended that the high ambitions for Meridian Water are more clearly stated, for example with reference to the aspirations for high quality development, as stated in the detailed policies, and the connectivity improvements.	The introduction wording of Section 5 has been significantly revised in the ELAAP to reflect the large scale and transformational nature of the development at Meridian Water.
20	E	GLA	CL8, CL10, Figure 5.3		The continued protection of the northern part of the Harbet Road site as Strategic Industrial Location (SIL), in line with London Plan Policy 2.17 and Annex 3; the general principle of the division of this SIL into a Preferred Industrial Location (PIL) and an Industrial Business Park (IBP); and the general principle of the consolidation of the southern part of the site for residential development, are supported in principle in line with joint work between the GLA and Enfield Council on the ULVOAPF.	The evidence-base modelling which informs the revised ELAAP shows that to achieve higher levels of development requires the Harbet Road industrial site to become a mixed-uses area. The AAP therefore de-designates all of the existing SIL at this location.
20	F	GLA	Figure 5.3, CL8		<p>The principle of the use of a buffer of IBP (SIL) between the PIL (SIL) and the residential development in the southern part of the site is supported; however as currently proposed in Figure 5.3, the residential area extends to the north of the Causeway along the River Lee Navigation, directly abutting the PIL. Policy CL8 also indicates that live-work development will be appropriate along the east side of the River Lee Navigation, both to the north and south of the Causeway, including within the PIL.</p> <p>The aim to introduce more attractive uses and activity along the River Lee Navigation is supported, as is the intention for the PIL to be of high quality and well designed; however the boundaries</p>	The position of the ELAAP AAP has evolved since this comment was received. The evidence-base modelling which informs the revised ELAAP shows that to achieve higher levels of development requires the Harbet Road industrial site to become a mixed-uses area. The AAP therefore de-designates all of the existing SIL at this location.

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					of the PIL, the residential area, and the live/work uses should be reconsidered (as suggested at Appendix 2) to avoid any environmental impacts such as noise, dust, odour, and vehicle movements that could negatively impact residential uses, supported by London Plan Policy 2.17C. It is recognised that the eastern side of the River Lee Navigation is a key asset and in order to promote pedestrian footfall and maximise activity, it is recommended that smaller high quality commercial uses should be promoted along the waterside in the non-residential areas. GLA officers are happy to continue discussions with the borough in order to ensure an appropriate delineation between PIL, IBP and residential uses in Meridian East. Any changes should also be reflected in the Central Leaside AAP Policies Map.	Ensuring the River Lee Navigation is a focal point for community and commercial activity, while achieving high quality design, is supported by several policies including EL3, EL10, EL12 and EL27.
20	G	GLA	CL8, CL10 Para's 5.5.2, and 5.5.6 to 5.5.7		The wording of the 5 th bullet point of CL8 could be taken to suggest that mixed use development, including industrial and residential, is appropriate within the IDP south of Angel Works Square, as well as along the watercourses in the Meridian East neighbourhood. Similar inferences could be taken from paragraphs 5.5.2, 5.5.6 to 5.5.7 and the 7 th bullet of CL10. For the reasons set out above, and to avoid the uncertainty and consequential hope value on the remaining industrial sites, it is recommended that this text should be clarified.	The revised ELAAP does not include these policies, or a designation of IDP. The AAP sets out the need to achieve transformational change, with the economic and employment approach at Meridian Water established in Section 5.4 and policy EL2.
20	H	GLA	CL10		The aspirations in CL10 to secure higher quality and higher value industrial uses in the PIL are recognised and supported. In reflection of this, the emphasis on B1(c) and B2 uses in CL10 is acknowledged; however it should be noted that London Plan	For the altered approach to SIL at Harbet Road see the responses to items E, F and G above. The absence of an industrial land

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					Policy 2.17 and paragraph 2.79 do not preclude B8 uses.	designation does not preclude the operation of industrial sectors within the B2 and B8 uses.
20	I	GLA	Transport issues		Transport comments including the relocation of Harbet Road bus depot and those at Appendix 1.	See responses to TfL representations.
20	J	GLA	CL14		Proposals for the redevelopment and reconfiguration of the retail units at Ravenside Retail Park (CL4) 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 CL14 makes this clear.	Policy EL4 references policy DMD 25 which requires the sequential test.
20	K	GLA	CL18, CL19, Table 6.2, Table 6.3		The AAP approach to the quantum of SIL and LSIS release and reconfiguration is supported in principle, as detailed in CL18, CL19, Table 6.2 and Table 6.3. However, as stated above, the boundaries of the PIL, the residential area, and the live/work uses in Meridian East should be reconsidered.	For the altered approach to SIL at Harbet Road see the responses to items E, F and G above.
20	L	GLA	CL20		Policy CL20 states that “development must deliver increased job densities... “. Whilst this objective is supported as a general principle, there are industrial type functions necessary to support London that may not always lead to an increase in job densities on a given site, and yet may be appropriate development in SIL in the terms of London Plan Policy 2.17. Suggested that the word “must”, be replaced with “should”.	The wording has been amended in policy EL15 which now states: <i>‘Development should deliver buildings and services to meet modern business needs, a better range of employment opportunities, which could secure higher job densities...’</i>
20	M	GLA	CL21		Policy CL21 for employment mixed uses is supported, as is the clause that residential uses will not be appropriate on this site.	Comment noted. No further action necessary.
20	N	GLA	Section		Section 14.4 should reference the Development Infrastructure	As per response to TfL

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
			14.4		Funding Study (DIFS) for the Upper Lee Valley, which is currently underway having been jointly commissioned by the GLA, Transport for London and the London Boroughs of Enfield, Hackney, Haringey and Waltham Forest. The DIFS is due to be completed in spring 2015 and will identify the strategic infrastructure required to deliver the growth outlined in the ULV OAPF, including transport, utilities, social and community facilities.	representation, the ELAAP references the Development Infrastructure Funding Study (DIFS) in paragraph 14.3.13.
21	A	Lee Valley Leisure Trust Ltd – Del Goddard			<p>The LVRP previously put forward proposals for the development of the site and the Trust believes that much of what was proposed is feasible in order to substantially increase the usage of the site for local residents as well as other users. This would not compromise the open spaces. Whatever facilities are developed on the site, a substantially increase in footfall is expected.</p> <p>Wording needs to be inserted into the AAP Picketts Lock section reflecting the need to substantially increase the facilities and usage, including a hotel to provide accommodation for out of London users of LVAC, as well as meet the recognised need for hotel space.</p> <p>As much of the site can be protected as open space, consideration should be given to the de-designation of the Green Belt status to facilitate development that meets the needs of residents and other users. The transport (bus and rail)</p>	<p>Policy EL19 sets out the potential for a large significant new development that will provide a destination attraction for Edmonton Leaside and beyond</p> <p>Policy EL19 includes wording that the site is suitable for a hotel, among other uses. The policy wording is assumptive of an increase in use, while para 10.1.5 refers to the benefits for new and existing communities.</p> <p>Green belt status in not reviewed by the ELAAP. Core Policy 33 established Pickett's Lock as a Major Development Site within the</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					<p>implications of the expansion of the facilities and the footfall need to be made explicit both in terms of access and volumes.</p> <p>The economic development opportunities of the Trust sites are being pursued regarding the encouragement of businesses related to LVAC (and any new facilities) alongside other sites operated by the Trust. These could be accommodated on the site by developing space within LVAC (e.g. technical equipment/fitness/R&D businesses and potentially production. Developing such a cluster could provide a focus for the Claverings estate as it is nearby and thus recognise the area as part of a comprehensive vision.</p> <p>Given that Picketts Lock is also in a very deprived area and on the edge of the Bountague project, other socio-economic objectives, including employment, could be considered. The Trust believes that such a vision could be created for the area.</p> <p>The Trust is developing a cycling strategy for the whole of the Lee Valley as part of the LSCC. A cycling base as part of a string of hubs along the river is proposed and this should join up with the cycling strategy of Enfield. This will form part of the London to Cambridge cycle route way, being a hub for that and linking east west of the Enfield scheme to the north south of the Lee Valley (increasing access points through the site). This applies to a section further south.</p>	<p>green belt.</p> <p>Uses at the Pickett's Lock site must be appropriate with regard to Core Policy 33, and DMD policies on the green belt. Industrial uses will be directed towards the industrial estates on land designated as SIL (Significant Industrial Location) or LSIS (Locally Significant Industrial Site).</p> <p>Policy EL19 requires proposals to demonstrate that they will create new jobs for local people.</p> <p>Support for cycling is a key part of the AAP and is specifically addressed by EL21 and EL22. Development of cycling infrastructure in the Lee Valley must be carried out with good cooperation between the Council and the LVLTL.</p> <p>The Council will continue to</p>

Response no	Item	Organisation and Contact	Location in document (2014 version)	Respondent defined as matter of soundness or legal compliance	Summary of response	LBE response and Reference to the revised Proposed Submission ELAAP
					The Trust may well be interested in supporting the marina development of Meridian Water as it operates two marinas and has the management capability to extend that support.	cooperate with stakeholders, including the LVLTL, over development at Meridian Water.
23	A	London Waterway Partnership - Brian Fender			<p>Canals are a valuable asset for a broad and growing community of users. Boaters are a key element in the use of waterways but are quite a small element of the total engagement with canals and rivers. Walkers and cyclists who use a towpath regularly are more numerous. CRT rightly draws attention to the significant contribution the use of waterways makes to healthier lifestyles. Other users of canal and river infrastructure include anglers and canoeists, as well as attendees of festivals and arts events.</p> <p>Within the published plan LWP are pleased to see the strong reference to the role of canals and rivers in objective 5. Within that objective several points are of direct interest to the London Waterway Partnership and the Canal & River Trust</p> <p>The CRT should be a key partner to the Council.</p>	Comments noted. No further action required.