

London Borough of Enfield

Cabinet

Meeting Date 12 October 2022

Subject: Draft Meridian Water Western Bank Supplementary Planning Document

Cabinet Member: Cllr Caliskan

Executive Director: Joanne Drew (Acting)

Key Decision: 5375

Purpose of Report

1. This report seeks agreement to the publication of the draft Meridian Water Western Bank (MWWB) Supplementary Planning Document (SPD) for public consultation under Regulation 13 of the Town & Country Planning (Local Planning) (England) Regulations 2012 as amended.
2. The borough's Local Plan identifies the Meridian Water area for major housing and employment regeneration. The SPD will help to coordinate development across the western bank area, providing more detail to supplement the policies and proposals contained in the Local Plan. The Local Plan comprises the Core Strategy (2010), Development Management Document (2014), Edmonton Leaside Area Action Plan (ELAAP) (2020), London Plan (2021) and North London Waste Plan (NLWP) (2022). ELAAP is the most pertinent policy document to the Meridian Water Western Bank area because of its geographical focus and age.
3. Once adopted, the draft MWWB SPD will be a material consideration in the determination of planning applications.

Proposal(s)

4. Approve the draft MWWB SPD as set out in Appendix 1, for public consultation;
5. Delegate authority to the Director of Planning and Growth to agree the timing of the public consultation and to make any necessary and appropriate minor editorial amendments to the draft MWWB SPD in consultation with the Director of Development prior to it going out to statutory public consultation; and
6. To note that following statutory public consultation, it is intended that the MWWB SPD will be brought back to Cabinet early 2023 for final approval.

Reason for Proposal(s)

7. Approval of the draft MWWB SPD for statutory public consultation will enable the Council to set a clear direction of travel, indicating the Council's ambitions for the type and quality of development it expects in the Western

Bank area and how it expects the interfaces between various land uses to be managed. The SPD adds detailed specific guidance to the policy framework for the Western Bank area and will help ensure development:

- a) Aligns with the principles of positive placemaking;
- b) Reduces the risk associated with uncoordinated speculative ad-hoc planning applications;
- c) Is properly integrated with its surroundings, minimising the risk of 'bad neighbour' impacts;
- d) Plans for and delivers infrastructure to support existing and future residents; and
- e) Creates a liveable and vibrant place.

Relevance to the Council Plan

8. The MWWB SPD will contribute to the delivery of the following corporate priorities:

- **'Good homes in well-connected neighbourhoods'**

Provide the guidance to help create a sustainable extension of Edmonton, delivering thousands of new homes set within improved and new blue-green connections, in a new neighbourhood designed to support walking and cycling that is within easy reach of the new Meridian Water station.

- **'Safe, healthy and confident communities'**

Provide the guidance to plan for and help secure new schools, health facilities, street greening, sport, leisure, recreational and cultural facilities close to where people live, including new parks and open spaces and better access to the Lee Valley Regional Park.

- **'An economy that work for everyone'**

Provide the guidance to support a diverse mix of employment opportunities, through transforming a former industrial area, delivering a range of workspaces to attract jobs and investment. The SPD provides the guidance for a new local centre that will serve as a multifunctional community hub, offering shops, places to eat and drink, and community facilities.

Planning policy context

9. SPDs are used as a material consideration in determining planning applications; however, they are not part of the Development Plan, but are linked to a specific policy in the Local Plan. The National Planning Policy Framework 2021 requires SPDs to only provide further detail to Local Plan policies to help applicants make successful applications or aid infrastructure delivery.

10. Enfield's Local Plan is comprised of the Core Strategy (2010), the Development Management Document (2014), Edmonton Leaside Area Action Plan (2020), the London Plan (2021) and the North London Waste Plan (2022). Aside from the NLWP, these planning documents seek the Meridian Water area to be developed as a residential-led mixed-use high-density Area. The NLWP specifically deals with land use planning aspect of waste management in north London.

Reason for SPD

11. Significant progress has been made to date since the adoption of the Core Strategy and ELAAP. Some of the sites in the Western Bank area are in the ownership or under control of the Council, whilst some are privately owned. Land assembly has helped to progress Council-led phases and planning consents have been secured for the wider Meridian Water area. In addition, government funding has been secured for strategic infrastructure works.
12. A SPD is needed for the Western Bank area to ensure coordinated development, including the identification of infrastructure contributions to avoid poor quality fragmented development, facilitate the delivery of a comprehensively planned area and provide greater guidance and to facilitate high quality design, infrastructure provision and placemaking to secure maximum benefits for the wider community. The production of the MWWB SPD was envisaged by both the Core Strategy and ELAAP.
13. The SPD area is surrounded by land uses which present compatibility challenges with high density new homes. There are 19 safeguarded waste management sites in the vicinity, as well as three priority search areas for new waste management facilities, which have been designated as part of the recently adopted NLWP. Strategic Industrial Land lies to the north, south (in LB Haringey) and further east (LB Waltham Forest). In order to realise ELAAP's ambition that industrial estates can continue to thrive, further guidance is required to manage interfaces and proactively overcome 'bad neighbour' conflicts.
14. The vicinity of the site is rich in natural assets – Salmons and Pymmes Brooks, the Lee Navigation and the Lee Valley Regional Park are close by. Providing further planning guidance will help development make the most of these assets, enhancing their biodiversity and recreation value and helping to link Edmonton to the Lee Valley Regional Park.
15. By providing further guidance on the creation of a new local centre in the Western Bank area, the MWWB SPD will ensure the creation of a multifunctional hub, where existing and future residents can exploit future job opportunities in a range of economic sectors, helping to deliver on the ambitions set out in ELAAP.
16. As such, further planning guidance is required to manage this growth to ensure the provision of affordable housing and infrastructure is planned for and delivered to support existing and future residents while creating a liveable and vibrant place.

Role of the SPD

17. The role of the SPD is to optimise the delivery of new development and secure community benefits for the borough by:
 - Ensuring good quality placemaking, helping to deliver new homes and workspaces;
 - Managing interfaces to ensure that all land uses in the area can thrive;
 - Coordinating the provision of new public open spaces and improved links to the area's natural context;
 - Identifying, planning and delivering social and physical infrastructure including public transport, schools and health facilities; and
 - Coordinating planning contributions.

Producing the SPD

18. The MWWB SPD is being developed by officers in the Local Planning Authority in collaboration with the Meridian Water Team.
19. The Council produced a draft Screening Report in August 2021 to determine if significant environmental effects would be likely. The report concluded with the Council's preliminary view that the draft MWWB SPD would be unlikely to give rise to significant environmental effects. The Council consulted with the relevant bodies including: Environment Agency, Historic England and Natural England on the preliminary screening assessment outcome. No responses were received contrary to this view.
20. On the basis of responses received, the Council has confirmed its view that the MWWB SPD is unlikely to give rise to significant environmental effects, and a Strategic Environmental Assessment is therefore not considered necessary. A formal statement of determination and a final screening report will be issued in due course and prior to the adoption of the MWWB SPD.

Content of the SPD

21. The content of the MWWB SPD has been developed to supplement the current planning policies in place. It provides clear and concise guidance to aid the delivery of new development and capture community benefits. It consists of the following guiding sections:
 - 1.0 Introduction
 - 2.0 Context
 - 3.0 Vision
 - 4.0 Guiding principles
 - 5.0 Infrastructure delivery

Proposed consultation

22. SPDs undergo a much simpler preparation process than Development Plan Documents and are not subject to scrutiny by an independent inspector. However, they are subject to statutory preparation procedures in

accordance with Regulations 11-14 of the Town and Country Planning (Local Planning) (England) Regulations (2012) and statutory public consultation will be undertaken in accordance with the [Council's Statement of Community Involvement \(SCI\)](#).

Main Considerations for the Council

23. The main considerations for the Council of preparing, consulting and adopting an SPD for the Meridian Water Western Bank area is the ability to achieve high quality placemaking and deliver infrastructure provision across the area and ensure a comprehensive approach. There are multiple landowners and potential developers with an interest in Meridian Water. It is critical that they deliver both on the key placemaking set out in the MWWB SPD and make timely and proportionate contributions to the delivery of the necessary supporting infrastructure. The MWWB SPD will provide the framework for infrastructure funding such as Section 106 contributions alongside the Community Infrastructure Levy, thereby supporting the delivery of key infrastructure. This supports all three priority pillars of the Council's Corporate Plan.
24. Whilst SPDs are not part of the statutory development plan (such as the Local Plan) with its associated planning status and weight in decision making, they are an important material consideration when determining planning applications.

Safeguarding Implications

25. There are no direct implications relating to safeguarding.

Public Health Implications

26. The built and natural environments are major determinants of health and wellbeing of the population, and development within the Western Bank area will provide opportunities for a healthy living environment which will promote and enable healthy behaviours.
27. Secure housing is a basic human need and is essential to maintaining and improving health. Enfield's Joint Health and Wellbeing Strategy both references and links to the Council's Housing and Growth Strategy accordingly. Increasing capacity within the housing sector in Enfield will therefore further help to meet housing needs.
28. Promoting active travel (walking and cycling) with new healthy streets and parks can be a very effective means of integrating physical activity into everyday life. Improving cycling facilities in the Borough also has the potential to significantly increase the disposable income of all residents in the Borough. Other benefits to individuals could include greater access to employment, education, shops, services, recreation, health facilities and the countryside.
29. Currently, 4.3% of Enfield adults cycle once a month and 40.5% walk once a month as a means of transport. Best practice for cycling is 46.9% and 65.7% for walking. Therefore, any means of directly supporting the take up of walking or cycling is to be encouraged.

30. The SPD should have a positive impact on general health and well-being in terms of improving the environment and promoting health and wellbeing by facilitating better housing, employment and increased physical activity. However, implementation of the SDP will need to be monitored to ensure that there are no significant negative health impacts such as from noise/dust pollution during demolition and construction works.
31. In addition, it is noted that many Enfield residents live in close proximity to the North Circular Road (A406) meaning that this noise/air pollution is likely to be an ongoing issue that needs to be addressed to ensure good health. Particular attention to good ventilation as well as acoustic insulation is paramount.

Equalities Impact of the Proposal

32. The Equality Act 2010 places a statutory duty on the Council to ensure that when considering any new or reviewed strategy, policy, plan, project, service or procedure the impacts on particular groups have been considered. A full Equalities Impact Assessment (EqIA) has been completed and is available in Appendix 2. It identifies a general positive impact (in terms of facilitating the delivery of new homes, workspaces, community facilities, green spaces, and safe active streets) which will help address issues of homelessness, unemployment, poor health, exposure to pollution and safety, which disproportionately affect some groups more than others. No negative impacts from an equality perspective were identified for any of the protected groups.
33. The MWWB SPD provides guidance for building typologies and public spaces that seek to deliver clear, legible and active open spaces and movement routes to create safe environments. New developments will also have to satisfy the relevant policies in the Council's Local Plan relating to 'Secured by Design' principles. Development will be required to ensure crime prevention measures are considered to assist with reducing the opportunity for crime and the fear of crime, by creating a safer and more secure environment.

Environmental and Climate Change Considerations

34. The allocation of major development in the Western Bank area of Meridian Water has been the subject of a full sustainability appraisal process as part of the preparation of the ELAAP and the allocation of Meridian Water as a development site was found to be 'sound' by an independent planning inspector, having regard to the sustainability appraisal.
35. As mentioned in paragraphs 19 and 20 of this report, it is necessary under the Environmental Assessment of Plans and Programmes Regulations 2004 and the Conservation of Habitats and Species Regulations 2017 to assess the need to undertake a Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA). An SPD screening report was prepared to identify if a SEA and HRA would be required. The responses from the statutory consultees will be set out in the final screening report. Based on our assessment and the comments from national statutory bodies, the Council will not be required to undertake a full SEA or HRA.

36. The SPD provides the guidance to support opportunities on how more sustainable development of the area can be brought forward:
- Securing biodiversity net gain;
 - Delivery of a green infrastructure network i.e. the green network;
 - New tree planting;
 - Delivering new public open spaces and amenity spaces;
 - Setting out requirements for more sustainable forms of building and public realm areas, helping to address the climate emergency and mitigate impacts of a changing climate;
 - Provision of new and enhanced walking, cycling and public transport links to provide good alternatives to car travel; and
 - Provision of schools and local facilities on site to reduce the need for new residents to travel and enhance their ability to reach those facilities by non-car modes.
37. Any development within the SPD area would also be required to meet the sustainability standards set out in the adopted development plan (comprising the London Plan 2021, Core Strategy 2010, and Development Management Document 2014).

Risks that may arise if the proposed decision and related work is not taken

38. Relying on the Core Strategy and the Edmonton ELAAP is not considered sufficient as they do not provide the necessary level of detail needed to plan for and coordinate the scale of development expected in the Western Bank area. The additional guidance provided by the MWWB SPD ensures that there is a more detailed local planning framework to manage and guide development sites coming forward and to deliver necessary infrastructure, public realm improvements and community benefits.
39. The MWWB SPD, if adopted, would provide additional and greater certainty to developers to secure delivery of housing in the Western Bank area. Proactive discussions with developers in relation to allocated sites will continue to enable the sites to be brought forward quickly and ensure that Enfield hits its annual housing targets and meets the government’s Housing Delivery Test.

Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks

40. The table below sets out the risks that may arise if the proposed decision is taken and the actions proposed to be taken to manage the risks.

Table 1: Risk assessment

Risk description	Actions to manage the risks
Some of proposals contained within the draft MWWB SPD may not be welcomed by all stakeholders.	Further consultation may take place on specific development opportunities prior to statutory consultation.

A major overhaul of the planning system may delay the implementation of the SPD.	Monitoring of government guidance on the reforms, potential to use Local Development Orders to ensue development is appropriate and delivered as needed.
The impact post pandemic is not yet ascertained. Economic instability will have an impact on investment funding of major projects. Local government funding may also decrease and the ability to bring forward development projects may be severely hampered.	Commercial property markets will be monitored and professional advice will be taken as necessary. Budgets will be monitored and work programmes will be adjusted to cater for the economic impact the pandemic and potential future recession will have.

Financial Implications

41. There are no direct financial implications arising from this report. The MWWB SPD will be published electronically on the Council's website and only limited hard copies will be produced. There will be some modest costs associated with running a public consultation, including the production of associated materials and potentially venue hire. These will be funded within the agreed Planning Service budget.

Legal Implications

42. Pursuant to section 19(2) of the Planning and Compulsory Planning Act 2004, when preparing a SPD, the Council must have regard to:
- National policies and advice contained in guidance issued by the Secretary of State;
 - The spatial development strategy if the authority is a London borough;
 - Any other local development document which has been adopted by the authority;
 - The resources likely to be available for implementing the proposals in the document; and
 - Other matters as the Secretary of State prescribes.
43. Furthermore, the Council must comply with their Statement of Community Involvement which sets out how the local planning authority will consult and engage with individuals, communities and other stakeholders as set out in section 19(3) of the Planning and Compulsory Purchase Act 2004. The MWWB SPD does not form part of the statutory development plan but will be an important material consideration in the making of the planning decisions.
44. There is a statutory process for preparing an SPD and the requirement is set out in Regulations 11 to 16 of the [Town and Country Planning \(Local](#)

[Planning\) \(England\) Regulations 2012](#) for the production and adoption of planning documents.

45. The Environmental Assessment of Plans and Programmes Regulations 2004 and the Conservation of Habitats and Species Regulations 2017 also require the Council to consider whether or not a Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA) of the SPD should be undertaken. Following consultation with the Environment Agency, Historic England and Natural England it has been concluded that neither an SEA or HRA will be required.
46. It is considered that the above mentioned legislation has been complied with and there there are no direct legal implications as a result of this report.

Workforce Implications

47. There are no workforce implications associated the preparation of the SPD.

Property Implications

48. There are no specific property implications arising directly from this report. There may be future property implications. Any future reports arising as a result of these proposals will need to be further reviewed, Property Services will comment on those as they arise.

Other Implications

49. The MWWB SPD will enable the Council to ensure that housing delivery is optimised and that securing the benefits for the wider community is maximised. The development of the Western Bank area will release further financial contributions from forthcoming development sites, which in turn will deliver new affordable housing, local enterprise and employment opportunities, public realm enhancements, and community infrastructure. However, it is noted that most forms of development in the Meridian Water area are currently exempt from CIL (apart from Mayoral CIL).
50. The consultation on the MWWB SPD will be undertaken by the local planning authority in accordance with the Data Protection Act 2018 and the General Data Protection Regulation.

Options Considered

51. Consideration was given to the following options:

Table 2: Options considered

Options	Comments
Option A: publish the draft MWWB SPD in autumn 2022 for public consultation	Policy EL6 of ELAAP and paragraph 9.17 of the Core Strategy indicates that an SPD will be produced.
This is the recommended option	The SPD provides the opportunity to ensure that development in the area comes forward in a strategic and

Options	Comments
	comprehensive manner. It will set design principles to ensure coordinated and high-quality development across the Western Bank, outline other requirements and principles for development and set out the infrastructure requirements for development of the area and how they can be delivered in a timely manner.
<p>To not publish the draft MWWB SPD in autumn 2022 for public consultation.</p> <p>This is not a recommended option</p>	<p>This approach would result in an uncoordinated approach to development across the area. It is likely to result in a lack of coordination of key infrastructure provision with the risk that not all infrastructure is provided, or it is not provided for in a timely manner. It also risks the lack of joined up thinking in relation to key design principles across the area.</p>
<p>To delay the publication of the SPD.</p> <p>This is not a recommended option.</p>	<p>This option was not pursued as it would not help the council address the pressing housing crisis or adequately deal with the risk of piecemeal poor-quality planning applications. The Government have also advised Local Planning authorities (through a Chief Planner's letter) not to delay and to carry on with plan-making despite wider uncertainties raised by potential changes to the planning system.</p>

Conclusions

52. Cabinet is recommended to approve the draft MWWB SPD set out at Appendix 1 to this report for consultation and delegate authority to the Director of Planning and Growth in consultation with the Director of Development to agree the period for consultation and make any appropriate and necessary revisions to the draft SPD prior to public consultation.
53. The proposed implementation date, if the MWWB SPD is not called in is early November. The call-in period is five clear working days from the date of the publication of the decision. The full implementation stages are set out in table 3.

Table 3: Implementation timetable

Date	Details
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Date	Details
Early November 2022	Commence public consultation on the draft SPD
Mid December 2022	Close public consultation on the draft SPD
Early Spring	Cabinet approval for adoption of SPD
Spring 2023	Target date for adoption of SPD.

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Date of report: 15 August 2022

Appendices

- Appendix 1. Draft Meridian Water Western Bank Supplementary Planning Document
- Appendix 2. Enfield's Equality Impact Assessment for MWWB SPD

Background Papers

The following documents have been relied on in the preparation of this report:

- Edmonton Leaside AAP (2020)
- Sustainability Appraisal to accompany Edmonton Leaside AAP