

# Meridian West – Supplementary Planning Document

Consultation Statement

May 2023

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## 1.0 Introduction

- 1.1 This statement sets out an account of the Meridian West Supplementary Planning Document (SPD) consultation. Consultation was undertaken in accordance with the Council's Statement of Community Involvement and the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2 The statement firstly provides an overview of the consultation actions undertaken by the Council, before setting out who responded to the consultation and the number of responses received. A summary of the main issues raised by consultees is then provided.
- 1.3 Appendix A sets out a comprehensive account of all the points made by representors and the Council's response (i.e. how the issues have been taken account of in revision the draft SPD).

## 2.0 Summary of the consultation

2.1 This section sets out the main steps undertaken by the council as part of the consultation on the Meridian West SPD.

### Pre-consultation phase

2.2 Prior to formal consultation, the Council undertook a series of pre-consultation engagement sessions with key stakeholders. The main purpose of these sessions was to make stakeholders aware that preparation of an SPD was in train, and to take on board their preliminary views and perspectives as the SPD was being prepared.

2.3 The following sessions were held throughout 2022:

- Adjoining boroughs, the GLA and TfL, 6<sup>th</sup> May 2021 and 17<sup>th</sup> June 2022
- Lee Valley Regional Park Authority, 26<sup>th</sup> May 2022
- Canal and River Trust, 31<sup>st</sup> May 2022
- Environment Agency, 1<sup>st</sup> July 2022
- Thames Water, 9<sup>th</sup> September 2022
- Natural England, 9<sup>th</sup> September 2022

2.4 Meetings with landowners, led by the council as site promoter, were also held in early 2022.

### Formal consultation phase

2.5 Enfield Council's Cabinet approved the Meridian West SPD for public consultation on 12th October 2022.

2.6 Cabinet also agreed to delegate authority to the Director of Planning and Growth to agree the timing of the public consultation. It was agreed that consultation should take place for six weeks – exceeding the statutory minimum of four weeks.

2.7 Consultation commenced on 9th November 2022 and ran until 11:59 on 14th December 2022.

2.8 Email notifications were sent to organisations and persons on the Council's planning policy mailing list. The list comprises individuals who have previously expressed an interest in being kept notified of planning policy consultations. This included a good range of specific and general consultation bodies, as defined in the Town and Country Planning (Local Planning) (England) Regulations 2012.

2.9 In order to reach community groups in the vicinity of Meridian Water, a further email notification was made to community groups active in the south east of the borough, drawing on contacts held within the Council. 94 groups were contacted to alert them to the consultation.

2.10 A dedicated webpage was set up at [www.enfield.gov.uk/mwwbspd](http://www.enfield.gov.uk/mwwbspd) to host a pdf of the draft SPD and to inform interested parties of the consultation.

- 2.11 A press advertisement was placed in the Enfield Independent, notifying residents of the consultation. In addition, a media release was issued to local and specialist newspapers. This resulted in in-depth coverage in Avrupa and Parikiaki.
- 2.12 The consultation was publicised on the Council's social media channels (including Twitter and Facebook).
- 2.13 The Council's 'Have Your Say' platform was used to publicise the consultation, with a dedicated page setting out the aims and scope of the SPD, and ways to get involved.
- 2.14 To ensure that digitally excluded residents were not left out, hard copies were placed in the Council's Silver Street reception, and at nearby libraries at Fore Street and Edmonton Green.
- 2.15 Two drop-in sessions were held to give residents and interested parties the opportunity to find out more about the SPD and to pose questions to Council officers. The drop-in sessions were held at Fore Street Library (approximately 850m from the Meridian West area) on:
- 10am to 1pm, Tuesday 15th November
  - 4pm to 7pm, Monday 28th November
- 2.16 An outline of the range of issues raised at the drop-in sessions is provided in the next section.
- 2.17 In addition to extensive external promotional efforts, the SPD consultation was publicised internally to council staff via an email to Directors and Heads of Service, the Members' Newsletter, and emails to local ward Councillors.
- 2.18 Two ways of responding were publicised – by email to [localplan@enfield.gov.uk](mailto:localplan@enfield.gov.uk) and by post.
- 2.19 During the formal consultation period meetings were offered to key stakeholders to discuss the substantive content of the SPD and potential issues raised by proposed guidance. This offer was taken up by the GLA/ TfL (1st December 2022) and the Canal and River Trust (7th December 2022).

## 3.0 Who responded?

3.1 A total of 20 representations were received from a range of 19 organisations and one individual. These are as follows:

- Hadley Wood Neighbourhood Planning Forum
- Coal Authority
- Colin Saunders
- Better Streets for Enfield
- National Highways
- Thames Water
- Metropolitan Police Service
- Sport England
- Metropolitan Police Service – designing out crime
- Goodman
- Tesco
- Prologis
- IKEA
- Haringey
- Environment Agency
- Canal and River Trust
- Swifts Local Network – Swifts and Planning Group (London)
- GLA
- Lee Valley Regional Park Authority

3.2 A full schedule of the representations received including officer responses can be found on the council's website. This shows how officers have addressed each comment received and outlines the changes which have been proposed.

3.3 Follow-up meetings were held on request with Prologis (10th January 2023), LB Haringey (20th January 2023), and the GLA (31st January 2023). The meetings were held to clarify issues raised in their respective representations and to discuss proposed changes to the SPD.

## 4.0 Summary of the main issues raised

- 4.1 Positivity and general support – many responses expressed support for the intentions, aims and ambitions of the SPD. This support was expressed from all quarters – including ‘statutory’ consultees (such as National Highways and Canal and River Trust), landowners (Prologis), and the GLA.
- 4.2 Infrastructure – several have raised issues with the way that the SPD deals with infrastructure.
- The issue of apportionment was raised – IKEA argued that funding for any school should be proportionate to the needs generated by the redevelopment of the IKEA site, and other funding apportioned from other developments. Similar points were raised by IKEA with regards to the provision of bridges and the green loop.
  - Related to this, several landowners have queried why they should be required to accommodate specific pieces of infrastructure on their sites. Prologis have raised issues with aspects of the Green Loop and River Lee Navigation Open Space on their site, and IKEA have raised issues with their site being identified as an ‘optimum location’ for a school.
  - The issue of infrastructure costings and implications for viability was raised by IKEA. They also expressed a desire for a fully costed infrastructure plan.
- 4.3 Tall buildings – the GLA argue that the proper place for this content is within a DPD rather than an SPD. Other respondents also shared views on this point – IKEA argue that the wording as it stands is over prescriptive, Hadley Wood Neighbourhood Planning Forum argue that the wording is not prescriptive enough. The Canal and River Trust argued for an ‘area 3,’ stepping heights down to meet the River Lee Navigation, while LVRPA make a similar point, arguing for a considerable reduction in heights along the boundary with the Regional Park
- 4.4 Strategic occupier – IKEA stressed that the presence of a strategic occupier should not be a precondition for redevelopment of the site and argue for flexibility in terms of location.
- 4.5 Cross boundary transport impacts – Haringey have requested request that transport and highways impact on Haringey is properly identified within the SPD and that the list of infrastructure requirements to support delivery is broadened, specifically to include requirements to address identified impacts on Haringey.
- 4.6 Ongoing engagement – several have expressed an interest in remaining engaged in upcoming development proposals. LB Haringey would like to maintain engagement on the development of specific sites, improvements to Leaside Road, and planning for the new local centre. The Metropolitan Police Service would like to be involved in the location and timescale for delivery of the anticipated police base at Meridian Water. Thames Water would like to continue discussions on the scale and phasing of development. Canal and River Trust expressed an interest in early engagement on all development proposals adjacent, or close to the River Lee Navigation. Similarly, the Lee Valley Regional Park requested ongoing involvement with regards to green and blue infrastructure, bridge links and pedestrian and cycle routes that will connect the SPD area with the Regional Park.

## **5.0 Conclusions and next steps**

- 5.1 The draft SPD has been amended in line with consultation comments. Each comment received and the Council's response is set out in Appendix A.
- 5.2 Cabinet approval for adoption of the amended SPD will be sought in June 2023.



## Appendix A: Representations made and the Council's response

Repres entor ID	Name/ organisation	Nature of response	Relevant section	Relevant section/ guiding principle	Comment	Officers' analysis
1	Hadley Wood Neighbourhood Planning Forum	Comment	1.4	Introduction	States that the document does not introduce new planning policies, however, it then continues to say that "it will be a material consideration in decision making". The document contains mostly broad, high level statements that are light on details, which give the Planning Officers too much scope for interpretation.	As an SPD, the document will provide further detail and guidance to the existing policy framework. It cannot be overly prescriptive (for example, allocating sites for specific uses) or introduce new policy. Decisions will be made in line with the adopted development plan, mindful of material considerations including the SPD (if adopted).
1	Hadley Wood Neighbourhood Planning Forum	Comment	3	Vision	The Vision is another good example of the lack of details, as the wording would apply to any major development/regeneration scheme. It is also worth noting that the Vision doesn't reference the eight principles that are listed in the June 2022 Meridian Water Vision document.	The June 2022 Vision is a corporate rather than a planning document. There is alignment between the SPD and corporate Vision document.

1	Hadley Wood Neighbourhood Planning Forum	Comment	3.1	Objectives	Mentions the objective to deliver “around 5,000” homes, which is inconsistent with the above mentioned Meridian Water Vision document, which states that 10K homes will be created over the course of the 25 year development.	The 5k homes figure was established by the Core Strategy and ELAAP. As these documents form part of the adopted development plan, the SPD aligns with this. The 10k homes figure is a corporate aspiration which encompasses sites outside the SPD boundary.
1	Hadley Wood Neighbourhood Planning Forum	Comment	3.1	Objectives	Since the ELAAP adoption IKEA have closed down their store and the site is for sale and the 5,000 homes should be increased, with specific milestones/targets. The SPD lacks details.	Any change to the 5k homes figure would need to be dealt with through a DPD rather than an SPD.
1	Hadley Wood Neighbourhood Planning Forum	Comment	3.1	Objectives	The SPD must provide clear guidance how the promised 10,000 new homes will be provided over the next 25 years.	The SPD provides guidance on the delivery of 5k homes.
1	Hadley Wood Neighbourhood Planning Forum	Comment	4	Guiding principle 1: Movement and connectivity	Cars are given the lowest priority, however, the site is currently a PTAL 0-1 and to simply build housing without adequate parking will result in illegal and inconsiderate parking, not reduce private car usage. Alternative modes of transport must be available before the housing is occupied, just as schooling and	The SPD, in line with the London Plan and ELAAP, seeks to encourage active travel and discourage use of the private cars. The SPD supports the delivery of sustainable transport infrastructure. The major schemes that have been approved to date (Phase 1 and Phase 2) have been assessed against London Plan parking standards and provision is

					healthcare must precede it.	required in accordance with those standards. Both schemes are required to provide public transport improvements as part of S106 requirements.
1	Hadley Wood Neighbourhood Planning Forum	Comment	4	Guiding principle 3: Blue and green infrastructure network	Protection of existing trees should be an explicit aim, with replacement of trees lost due to development a requirement. We would suggest that replacement on a 2-for-1 basis would be appropriate.	There are few existing trees on site, additional supporting text included to require the replacement of any existing trees to be lost (para 4.27)
1	Hadley Wood Neighbourhood Planning Forum	Comment	4	Guiding principle 7: Delivering a new town centre	It is unclear what “town centre activities” comprises, and how the “acceptable uses” will be safeguarded when the General Permitted Development Order allows change of use from, for example, retail to residential or from restaurants to offices.	Main town centre activities are defined in the NPPF. It is outside the remit of the SPD to rescind rights granted by the government through the GDPO. Guiding Principle 7 (part 1) builds on the main town centre uses set out in the NPPF to outline the desired uses, activities and role of the centre.

1	Hadley Wood Neighbourhood Planning Forum	Comment	4	Guiding principle 8: Social infrastructure	Place markers for facilities such as schools, health centres, shopping and leisure should be part of the strategic plan for a development project of this scale. The ELAAP noted that 5,000 homes would require 2 primary schools and 1 secondary school and the location of those should have been established at the outset, not a decade into the project. It is also inappropriate for the SPD to state that “the IKEA site presents an optimal location for a school” without the agreement of the landowner or a compulsory purchase order.	Site allocations must be dealt with through DPDs rather than SPDs, through it is within the remit of SPDs to identify optimal locations for uses. For sites which are subject to extant planning consents, several social infrastructure items have been secured (such as a health centre in Phase 1 and a school in Phase 2).
1	Hadley Wood Neighbourhood Planning Forum	Comment	4.7	Guiding principle 10: Tall building definition and height strategy	The comment that “the London Plan defines ‘tall’ building as over 6 storeys” is incorrect. London Plan Policy D9 A states that tall buildings “should not be less than 6 storeys”, i.e. 6 storeys would be a tall building. Figure 4.6 rightly notes that roof plant and taller ground floors affect the number of floors vs height and it would be preferable to exclusively link the threshold to the height from ground level to the top of the building (i.e. 21m).	London Plan policy D6 states that “tall” is defined as buildings that are not less than 6 storeys <u>or</u> 18 metres measured from ground to the floor level of the uppermost storey.

1			4.7	Guiding principle 10: Tall building definition and height strategy	<p>The reasoning appears to be that, as the London Plan requires locations for tall buildings (over 21m) to be identified, all other locations can build up to 21m height. London Plan para 3.9.3 states that it is not automatically acceptable for any building to be up to the height threshold for tall buildings, and that buildings must not lead to unacceptable impacts on the area. Furthermore, there is nothing to stop boroughs from setting a lower default height level, as, for example, the London Borough of Bexley has done by applying 15m max height where taller buildings are not deemed appropriate. The 21m max height should be worded as a deliberate choice for this particular location, not the borough's default level.</p>	<p>This implication is not present in the reasoning. 21m is not indicated as a default height.</p>
1	Hadley Wood Neighbourhood Planning Forum	Comment	4.75	Guiding principle 10: Tall building definition and height strategy	<p>This paragraph undermines the entire maximum height concept and is unacceptable, as it allows planning officers to approve any height any location.</p>	<p>Any decision will be taken in accordance with the development plan, mindful of material considerations such as the tall buildings and height guidance provided in the SPD (if adopted).</p>

1	Hadley Wood Neighbourhood Planning Forum	Comment	4.76	Guiding principle 10: Tall building definition and height strategy	The comment that the placement of buildings must both “form a coherent and varied (including height) townscape” gives planning officers total freedom to approve whatever they want - several tall buildings alongside each other will be deemed “coherent”, while a single tall building next to 2 storey houses will be judged “varied” height. The wording must be amended to provide protection against overbearing buildings being erected near lower dwellings, such as single family houses.	Coherent and varied are not mutually exclusive. Many valued and cherished townscapes feature a variety of buildings within an overarching theme. Protection for the amenity enjoyed by residents of existing lower buildings is provided by the adopted development plan. Former paragraph 4.76 has been deleted.
1	Hadley Wood Neighbourhood Planning Forum	Comment	5	High-level guidance in relation to key sites	The comments on the various sites are of little use, as it is another example of broad, high level statements and the aim for every site is said to be high quality mixed use redevelopment. The document should also make it clear what the landowners’ intentions are.	The high-level guidance is intended to summarise the relevant parts of the SPD which apply to specific sites. Several landowners have responded to the SPD consultation, and their comments have fed into the final SPD.
1	Hadley Wood Neighbourhood Planning Forum	Comment	6.7	Infrastructure delivery	The document must detail the extent to which CIL from other parts of the borough will be used to finance this project.	CIL arrangements are set out in the adopted development plan and associated SPD.

2	The Coal Authority	Comment	General	General	Enfield Council lies outside the defined coalfield and therefore the Coal Authority has no specific comments to make on any stages of your Local Plan; SPDs etc.	Noted.
3	Colin Saunders	Comment	General	General	It is vital that the brooks walking trails are embodied in the plans and should be added to the planning maps. It is anticipated that further route improvements may become possible in due course as more of the brooks is opened up in the future.	Included as part of GP3 supporting text.
3	Colin Saunders	Comment	General	General	Provision should be made for Pymmes Brook and Salmons Brook trail signs to be relocated to the new routes within Meridian Water when they become available.	Included as part of GP3 supporting text
3	Colin Saunders	Comment	General	General	Provision should also be made for refreshment facilities and public toilets.	Included as part of GP3 supporting text. Refreshment facilities will be provided as part of a comprehensive mixed-use redevelopment. Public toilet provision is addressed by London Plan Policy S6.

4	Better Streets for Enfield	Support	4	Guiding principle 1: Movement and connectivity	Following active travel principles while jammed up against the north circular has its challenges. The intention to connect up with recent infrastructure, like the diagonal cycle path in Edmonton is very welcome.	Noted.
4	Better Streets for Enfield	Comment	4	Guiding principle 1: Movement and connectivity	The dedicated train station will clearly help but east/west has its challenges like anywhere else. It would be good to know a little more about which bus routes will run through or nearby the area, and if they are either new or extensions of existing routes? Apologies if in the detail but I couldn't see it. In particular it would be good to know about east/west routes. The 456 bus route is new and it could be an easy win to connect to it.	Additional information on bus provision added to GP1 supporting text and chapter 6.
4	Better Streets for Enfield	Comment	4	Guiding principle 1: Movement and connectivity	The main request is about specifics. For example How many spaces for car parking will exist? or What is the intended proportion of journeys taken active travel or public transport? I understand why planners may be reluctant to commit to hard numbers but stating some aims would be helpful. It feels as though so much time and effort has gone into this design that there is	The specific details of delivery will be dealt with through the DM process, with decisions taken in line with the adopted development plan and material considerations such as the guidance within the MW SPD (if adopted).



					scope for it to be a model for others to follow.	
5	National Highways	Support	3.1	Objectives	We welcome the aims of the SPD which are to deliver sustainable development with sustainable connections to the wider area. In particular, we support objective number 3, which aims to improve bus, rail and active travel connectivity for the area. This is a necessary component, alongside reductions in vehicle parking at source, for reducing overall traffic levels using the strategic network.	Noted.
6	Thames Water	Comment	4	General	We consider that the SPD should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development proposed in a policy. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are	This issue is dealt with by Core Strategy Policy 21 and ELAAP 5.12.9, as well as London Plan Policy SI5.

					regulated and plan in 5 year periods (Asset Management Plans or AMPs).	
6	Thames Water	Comment	4	General	<p>We recommend the SPD include the following policy/supporting text:</p> <p><b>PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT</b></p> <p>“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”</p> <p>“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a</p>	See above. This wording already forms part of ELAAP 5.12.9.

					capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”	
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6	Thames Water	Comment	4		It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.	This requirement is referenced in DMD 58 and the use of planning obligations to require adherence is stated in London Plan Policy SI5.
6	Thames Water	Comment	4	General	Proposed policy text: “Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the ‘Fittings Approach’ in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to	See above.

					new residential development to ensure that the water efficiency standards are met.”	
6	Thames Water	Comment	4	General	With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan “It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”	Suggested wording included as part of 4.34.

6	Thames Water	Comment	3.1	Vision	<p>The Edmonton Marshes to the east of the Western Bank Area of Meridian Water are shown as flood risk mitigation and open space. The majority of this site was compulsorily purchased from Thames Water. The area contains strategic underground infrastructure including strategic water mains and sewers. The sale agreement contains protective provisions to protect these strategic underground infrastructure. It is considered that it would be helpful to make reference to the need to protect this strategic underground infrastructure in the SPD and any supporting documents.</p>	<p>The area in question is outside the SPD area. As the protective provisions are contained within the sale agreement there is no need to repeat these in the SPD.</p>
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6	Thames Water	Comment	Figures 2.1, 2.2, 3.1	Figures 2.1 Meridian West SPD area and its surroundings, 2.2 Constraints and Opportunities & 3.1 Vision and Objectives: Thames Water Land to South of William Girling Reservoir	<p>The Thames Water land to south of William Girling Reservoir is shown shaded green on figures 2.2 and 3.1 as 'Existing Open Space' which is incorrect and should be amended. The site is not currently a green space, nor is it publicly accessible. The site's current lawful use is as a waste site and is previously developed land. The site is in operational use for waste recycling and includes large mounds of recycling material and associated buildings and roads. The southern part of the site is currently being used by North London Waste Authority as contractors depot as part of the Development Consent for the North London Heat and Power Project.</p> <p>The green shading on the Thames Water site to south of William Girling Reservoir (to north of north circular) should therefore be removed.</p>	Noted. The site is not a designated open space, figures amended as suggested.
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6	Thames Water	Comment	General	General	<p>The level of information contained in the draft SPD does not enable Thames Water to make an assessment of the impact the proposed development will have on the water supply and waste water/sewerage network infrastructure and water/sewage treatment works. To enable us to provide more specific comments we require details of the type and scale of development together with the anticipated phasing. It would therefore be helpful to continue the engagement and have ongoing discussions with the Enfield Council project lead in this respect.</p>	<p>Noted. Discussions are ongoing and will continue.</p>
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7	Metropolitan Police Service	Comment	6.2	<p>Table entry: Emergency Services Police Neighbourhood Transport Team Base / Front Counters: A base for the Police in the new community at Meridian Water.</p>	<p>MPS welcomes the acknowledgement of the need for contributions towards policing infrastructure, including a local police base. This is an approach also adopted at other similar large scale developments.</p> <p>MPS has a requirement for a 150 sqm police base within the development. In order for this to be affordable to occupy, MPS requests that the SPD makes clear that the space would be provided at a peppercorn rent. If MPS is offered space at commercial rents, this is unlikely to be viable. In addition, experience elsewhere has shown that developments must fund the cost of fitting out the space if delivery is to be affordable. The fit out cost is estimated to be £750,000, based on section 106 discussions ongoing regarding delivery of a similar base in another London borough. We believe that the SPD should refer to these issues, as they are of key importance in ensuring that a police base is deliverable.</p> <p>MPS would be keen to discuss at the appropriate time the most appropriate location within the development for the policing base. MPS is keen on locations with</p>	<p>Detailed considerations (such as location and phasing) will be decided through the development management process.</p>
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				<p>visibility. MPS is also keen to discuss the phasing further. We understand that the proposed phasing of delivery for the police base and associated contributions is very broad and believe that it would be helpful to narrow this down. The SPD states that planning permission has already been granted for 3,025 homes, but the phasing for the police base seems to leave delivery timescales open up as far as potentially 2032. We believe that a more specific timescale should be stated, acknowledging that a substantial amount of development is already consented at the site and requires policing infrastructure.</p> <p>We also note that MPS has a charging methodology for other policing infrastructure required to support the development. This is referred to within the attached 2021 Local Plan representations. We believe that this should be acknowledged within the draft SPD. This approach to S106 charging is widely used by Police and Crime Commissioners and has been proven to meet the relevant procedural tests at appeal and in the high court.</p>	
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7	Metropolitan Police Service	Comment	7.2	<p>Table entry: Emergency Services Police Neighbourhood Transport Team Base / Front Counters: A base for the Police in the new community at Meridian Water.</p>	<p>We suggest that Table 6.2 of the document is revised as follows:  Infrastructure Category: Emergency Services Police Neighbourhood Transport Team Base / Front Counters  Project Description: A base for the Police in the new community at Meridian Water and associated s106 policing infrastructure contributions.  Outcome: This would take the form of a 150 sqm police hub within community hub or space with Class E unit. The space would be provided at peppercorn rent and the fit out cost covered by the developer(s).  Funding: Development Costs, developer contributions  Trigger: At the early stages of development at Ikea/ Tesco/ Teardrop/ Ravenside Retail Park sites.</p>	<p>Detailed considerations (such as location and phasing) will be decided through the development management process.</p>
8	Sport England	Support	4	<p>Guiding principle 8: Social infrastructure</p>	<p>Sport England welcomes that new sport facilities would be sought within the area. This is especially important given that existing sport facilities within the area may not be able to accommodate the increased demand generated by the planned growth within the area without exacerbating existing and/or</p>	<p>Noted.</p>

					predicted future deficiencies.	
8	Sport England	Comment	4	Guiding principle 8: Social infrastructure	The type, amount and mix of facilities, however, should be informed by a robust evidence base such as the Council's Playing Pitch Strategy and any robust and up-to-date strategy relating to indoor/built sport facilities. Sport England recommends that Guiding Principle 8: Social infrastructure, MW 5.1: IKEA and MW 5.3: Tesco recognise the need for any new sports facility to be informed by such strategies to ensure sound and positive planning for sport and that any facility is sustainable in the long-term.	Paragraph 4.72 amended to incorporate suggested wording.

8	Sport England	Comment	General	General	<p>Sport England and Public Health England launched guidance called Active Design which intends to inform the urban design of places, neighbourhoods, buildings, streets and active open spaces to promote sport and active lifestyles. The guide sets out ten principles to consider when designing places that would contribute to creating well designed healthy communities which has considerable synergy within many elements of the Vision, Objectives and guiding principles within the draft document, particularly in relation to new open spaces, healthy streets, improved blue/green network, multifunctional green spaces, implementing a “Green Loop” and ensuring appropriate infrastructure is installed to facilitate active travel modes. Sport England recommend that the links between the draft document and Active Design are developed further and are really drawn out by having clear references to Active Design, its principles and the Active Design Checklist. Active Design principles and the checklist, for example, could be added to design requirements for any proposal submitted for planning permission. More information on</p>	<p>Reference to Active Design principles/guidance in added at paragraph 4.12.</p>
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					Active Design, including the guidance, can be found at <a href="https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design">https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design</a> .	
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9	Metropolitan Police Service - designing out crime	Support	3.1	Objectives	<p>The MPS is supportive of the few references to safety throughout the plan, which express the desire to achieve safe, healthy and confident communities. In reference to Objectives 3.1.2 it is stated that “A new town centre will serve as the focus of new employment, as well as a hub for wider commercial and community activities, serving as a vibrant, inclusive and safe heart to Meridian Water”.</p> <p>Regarding the safe environment, but also health and wellbeing, the MPS and the Secured by Design scheme can play a huge role in this. Research has consistently shown that crime, the fear of crime and health are related (Crossman &amp; Rader, 2011; McKee &amp; Milner, 2000; Stiles et al., 2003; Whitley &amp; Prince, 2005).</p>	Noted. Adherence to Secured by Design principles is required by DMD37.
9	Metropolitan Police Service - designing out crime	Comment	3.1	Objectives	<p>The above objectives all also make good references to safe spaces. Indeed the objectives 3.1.1, 3.1.2 mentions new schools, health and community facilities, which contribute to a safe heart to Meridian Water’ including for the elderly, children and those with health</p>	Noted.

					conditions or impairment.	
9	Metropolitan Police Service - designing out crime	Comment	4	Guiding Principles	<p>The MPS notes the detail in the 10 proposed guiding principles, particularly that these places have been prepared in the context of the NPPF and the London Plan. For Angel Edmonton, (Para 3.4.7) the crime concerns have been referenced with a clear willingness to address these issues through 'good design'.</p> <p>The MPS would like to see greater reference to addressing crime concerns with good design and indeed with the support of MPS Designing Out Crime officers and the Secured by Design Scheme. This is not reflected at all in the draft MWWBSPD and we would like to draw attention to two areas of the new London Plan (Policy D11 and paras 3.11.3 and 3.11.4)</p>	Noted. As stated above, the existing development plan references designing out crime.



9	Metropolitan Police Service - designing out crime	Comment	6	Infrastructure Delivery	It's noted on p.60 infrastructure category "Emergency Services, A base for the Police in the new community at Meridian Water" we would welcome this outcome and request further communication with ourselves and our Estate Strategy & Engagement team. In this regard due consideration should be paid to Section 17 of the Crime and Disorder Act 1998 which places a duty on local authorities to do all they can to reasonably prevent crime and disorder in their area. Embedding Secure by Design principles fits fully with this obligation.	Noted. Further discussions will take place between the Council as LPA and master developer and the MPS on the detailed planning of police infrastructure.
9	Metropolitan Police Service - designing out crime	Comment	General	General	I would finally like to reference one final section of the London Plan when considering our comments above. London Plan: Policy D11: Section B: Boroughs should work with their local Metropolitan Police Service 'Design Out Crime' officers and planning teams, whilst also working with other agencies such as the London Fire Commissioner, the City of London Police and the British Transport Police to identify the community safety needs, policies	Noted.

					and sites required for their area to support provision of necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. Policies and any site allocations, where locally justified, should be set out in Development Plans.	
10	Goodman	Support	General	General	In broad place-making terms, Goodman is supportive of the principle of transformational regeneration at Meridian Water. We acknowledge that at a high level the Development Plan establishes the Place Shaping Priority Area within the wider Opportunity Area. We also recognise that Area Action Plan policies seek to deliver many new homes and employment opportunities at Meridian Water. Moreover, we note that the recent closure of the IKEA store opens up the possibility of additional development at Meridian Water to the north of Mowlem Trading Estate.	Noted.

10	Goodman	Comment	4	Guiding principle 9: Managing transitions	Nevertheless, it will be vital to ensure that regeneration at Meridian Water does not compromise the continued success of Mowlem Trading Estate. Therefore, as detailed below, care should be taken to ensure that the SPD provides for development that does not conflict with established and future industrial activity.	Noted. The purpose of GP9 is to appropriately manage the interface between existing occupiers and comprehensive redevelopment at Meridian West.
10	Goodman	Comment	5.1	Ikea	In light of the planning considerations detailed in the above commentary, we consider that bullet 11 should be amended as follows (text to be deleted shown in strikethrough and new text shown in bold): “Appropriate design response to manage the interface between development and the busy Angel Edmonton Road, and the <b>Central Leaside Strategic Industrial Location</b> industrial uses to the south of Leaside Road. <b>Development must be designed to ensure that existing and potential industrial uses in the Central Leaside Strategic Industrial Location are not compromised or curtailed, including 24-hour operations and commercial HGV traffic</b> ”	Noted. Change made as suggested. However, rather than amending 5.1 (which is a summary of preceding guidance), new supporting text has been added at 4.80.

					<p><b>movements. Proposals for the redevelopment of the site must be accompanied by an Agent of Change Assessment”.</b></p>	
11	Tesco	Support	General I	General	<p>We support the overall aspirations of the Meridian Water Western Bank SPD in creating a sustainable mixed-use community providing new homes and jobs well served by community infrastructure; and we are keen to maintain a trading presence and keep a store which meets our operational and commercial requirements in line with these objectives.</p>	Noted.

11	Tesco	Comment	5.3	Tesco	<p>On this basis we suggest MW 5.3: Tesco should state specifically the need to keep the Tesco Superstore trading. We require a store of a similar size to the existing with requisite parking numbers, adequate servicing arrangements, and a petrol filling station; and continuity of trade is a prerequisite to the successful operation of the store and serving our customers in the local area.</p> <p>If the opportunity arises going forward we would welcome the chance to discuss with the Council how the new store will be delivered</p>	5.3 amended to include developer aspiration for a replacement store with continuity of trade.
12	Prologis	Support	General	General	<p>Prologis is supportive of the strategy set out in the draft SPD particularly in relation to industrial intensification of sites including the Ravenside site. Prologis also welcomes the ambitions of the SPD in delivering jobs and services which will benefit Enfield residents in Edmonton and beyond, supporting an economy that works for everyone.</p>	Noted

12	Prologis	Support	3.1	Objectives	<p>The objectives for the SPD are set out in Section 3.1 of the document, and one of these objectives is 'facilitating economic growth' to deliver improved commercial opportunities and employment to deliver higher density workspaces. Prologis notes another objective is to 'deliver sustainable development' and 'climate resilient development' which can meet the challenges of the future. Through its intentions to redevelop the Ravenside site, Prologis shares in the vision and objectives of the SPD and looks forward to working collaboratively with Enfield to deliver on these goals.</p>	Noted.
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12	Prologis	Comment	3.1	Objectives	<p>Prologis is concerned about the implications that Figure 3.1: Meridian Water Western Bank vision will have on the delivery of its scheme. We note there are a number of elements of the vision including new and improved links that constrain the development of the Ravenside site. This includes but is not limited to:</p> <ul style="list-style-type: none"> <li>• A Key Bridge across the site's southern boundary</li> <li>• Green loops running along the site's southern boundary, north to south and east to west through the site</li> <li>• Green corridor / Park on the site's eastern boundary</li> <li>• Buffer zone along Heavily Trafficked Roads on northern site boundary affecting size of development parcel</li> </ul> <p>Prologis objects to the potential constraints that would be imposed on the business through the adoption of the draft SPD. We set out below further concerns with the draft SPD written under the relevant headings of the SPD.</p>	<p>Noted. A meeting was held with the landowner and their agent to clarify the consultation response, and the key issue is the EW route through the site, which has been removed from relevant drawings.</p>
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12	Prologis	Comment	4	Guiding principle 3: Blue and green infrastructure network	<p>Prologis is concerned about the implications of designations showing the introduction of 'The Green Loop' and formation of 'Green connections' shown on Figure 4.3 of the SPD and elsewhere within the document, as well as the 'Culverted brook' shown running north to south through the site.</p> <p>These aspirations are set out within Section MW 5.2 Ravenside Retail Park of the draft SPD where the guidance identifies it will be important to activate the waterside setting, and incorporate elements of the green network, including the Green Loop and Lee Navigation Linear Open Space.</p> <p>Prologis welcomes the reference in para 4.24 which states that 'there is a need for flexibility on the route to factor in the optimum position within development proposals and in relation to the provision of infrastructure'.</p> <p>However, at this stage we are of the opinion that the pedestrian link shown running east-west through the middle of the Ravenside site is not deliverable in this location.</p>	Noted, see comment above.
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12	Prologis	Comment	5.2	Ravenside Retail Park	<p>Prologis is concerned about the implications of designations showing the introduction of 'The Green Loop' and formation of 'Green connections' shown on Figure 4.3 of the SPD and elsewhere within the document, as well as the 'Culverted brook' shown running north to south through the site.</p> <p>These aspirations are set out within Section MW 5.2 Ravenside Retail Park of the draft SPD where the guidance identifies it will be important to activate the waterside setting, and incorporate elements of the green network, including the Green Loop and Lee Navigation Linear Open Space.</p> <p>Prologis welcomes the reference in para 4.24 which states that 'there is a need for flexibility on the route to factor in the optimum position within development proposals and in relation to the provision of infrastructure'.</p> <p>However, at this stage we are of the opinion that the pedestrian link shown running east-west through the middle of the Ravenside site is not deliverable in this location.</p>	Noted, see comment above.
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12	Prologis	Objection	4	Guiding principle 2: Carbon reduction	Prologis objects to the requirement in part (1) (low carbon energy supply), which requires that “all developments need to minimise carbon from heating and cooling through connection to the Meridian Water Heat Network (MWHN), by ensuring all connections and networks meet Energetik’s standards, to maximise efficiency and minimise heat loss” as it is an onerous requirement to meet Energetik’s requirements. It is not clear what they are and how a developer can respond to this.	Energetik operate the Meridian Water Heat Network. Policy EL26 of ELAAP requires major developments to connect to Meridian Water Heat Network.
12	Prologis	Support	4	Guiding principle 9: Managing transitions	Prologis supports part (2) which states “multi-storey employment activities (use classes B2, B8, Egiii) are appropriate for the Northern Band as a buffer to the North Circular Road. Premises in the northern band should be designed to provide residential occupiers to the south with an appropriate standard of amenity by helping to buffer noise and pollution from the North Circular Road. Buildings should provide a suitable outlook, activity and visually attractive frontage to the NCR.” However, Prologis requests that the SPD is drafted to allow for flexibility	Guiding principle amended to reference 'supporting ancillary activities'

					for ancillary Class Egi and Class Egii in this location.	
12	Prologis	Comment	4	Guiding principle 10: Tall building definition and height strategy	Prologis welcomes the strategy to the provision of tall buildings and the indicative height parameters on Figures 4.6 and 4.7.	Noted
12	Prologis	Comment	5.2	Ravenside Retail Park	Prologis welcomes the policy aspirations set out in Policy MW5.2 but as explained above have some serious concerns regarding the incorporation of elements of the green network, including the Green Loop and Lee Navigation Linear Open Space. Savills does not see these commitments as being deliverable and should therefore be removed from the SPD.	A meeting was held with Prologis and established that the main issue was the EW link through the heart of the site. Relevant figures have been amended to omit this route.

12	Prologis	Comment	5.2	Ravenside Retail Park	<p>While Prologis is supportive of proposals to deliver development that improves permeability and incorporates elements of the green network, the routes proposed for the blue and green network would have negative implications on the operation of the redeveloped industrial uses at the Ravenside site. A major characteristic of an intensified industrial use would be the need for unrestricted commercial vehicle movements across the entirety of the site, and there would be real concerns about conflicts between vehicles and pedestrians if new public routes were to run across the site. Given the proposed use of the buildings, with floor plates of potentially c. 65,000 sq. ft (GIA), it would also not be possible to break the overall quantum of floorspace (at least 21,700 sqm referenced within the Regulation 18 Enfield Local Plan consultation document of September 2021) down into two or more separate buildings to allow a pedestrian link to run in between.</p>	<p>A meeting was held with Prologis and established that the main issue was the EW link through the heart of the site. Relevant figures have been amended to omit this route.</p>
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12	Prologis	Comment	5.2	Ravenside Retail Park	<p>We believe it is important to show these routes avoiding the industrial site to allow the site to be planned and utilised with maximum effectiveness. We note that Section 4.24 of the draft SPD indicates there is a 'need for flexibility on the route' for the Loop and other green and blue network improvements. However, given the intended use of the Ravenside site for industrial and logistics uses, this element of the proposals shown at Figure 4.4 (Green Loop – indicative axonometric view) needs careful consideration so as not to impact on the deliverability of the proposed scheme.</p>	Noted. The SPD references the need for flexibility on the route.
12	Prologis	Comment	5.2	Ravenside Retail Park	<p>We note in Section 5.2 of the draft SPD that developers will be expected to either deliver the transport and connectivity improvements noted above as part of their proposals or provide financial contributions towards their delivery through Section 106 Agreements, including commitments within Figure 3.1 to key pedestrian/cycle bridges (also shown at Figure 4.1). Prologis has concerns that these commitments cannot be delivered in</p>	The LPA will work with the landowner as part of DM process to discuss the exact location of bridges and apportionment of costs.

					the locations shown.	
12	Prologis	Comment	5.2	Ravenside Retail Park	We consider the emerging SPD should be reviewed so that its good intentions to deliver sustainable development would not be to the detriment of the deliverability of strategic sites. We suggest it would be more appropriate for the SPD to focus on delivering blue and green network improvements around the perimeter of the Ravenside Retail Park. We feel this would improve the prospects of the SPD facilitating the redevelopment of the Site to provide a high quality employment scheme.	The SPD is flexible on the route and width of the route. The exact nature of the green loop in this location will be established through dialogue and any subsequent planning application, though Figure 2.2 has been amended to show the green loop running on the southern perimeter of the Prologis site, and River Lee Navigation Open Space on its eastern perimeter.
13	Ikea	Comment	General	General	It is demonstrated below that the draft SPD is, in part, not considered to be “positively prepared”, “effective” and “consistent with national policy” but is capable of being so with modifications.	The tests of soundness set out in the NPPF apply to local plans and spatial development strategies rather than SPDs.

13	Ikea	Comment	General	General	The adopted Plan suggests that the Meridian Water area could delivery around 5,000 homes, although the emerging Local Plan recognises that the area has greater capacity and the ability to deliver in excess of 10,000 homes	Noted. The SPD has been prepared with reference to the existing development plan, which references the delivery of 5k homes. The emerging Reg 18 Enfield Local Plan (at para 3.5.6) references the 10k homes aspiration for Meridian Water as a whole, rather than solely Meridian West.
13	Ikea	Comment	General	General	Whilst it is recognised by Quod that the draft SPD must respond to the adopted Local Plan, the emerging Local Plan cannot be ignored and nor would it be in the interest of good planning to do so. Notably, the emerging Local Plan adopts a spatial strategy which seeks to focus the Borough's housing needs on sustainable brownfield sites, such as Meridian Water, in order to minimise greenfield (and especially those in the Green Belt) release. However, given the scale of housing need in the Borough, it is recognised by the Council in their Regulation 18 Local Plan that Green Belt release will be necessary in order to meet the Borough's housing needs. It is, therefore, in the interests of sustainable planning objectives that the efficient use of suitably located	Noted. See above. The emerging Reg 18 Enfield Local Plan is at a relatively early stage of preparation, so the weight it can legitimately carry is correspondingly limited.

					brownfield land should be promoted.	
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13	Ikea	Comment	General	General	<p>The consequence of the draft SPD drawing down from the now aged Local Plan, leads the draft SPD to set as its objectives the delivery of approximately 5,000 homes. It is clear that if this remains the objective of the draft SPD, it will fail to make effective use of land for the following reasons.</p> <ol style="list-style-type: none"> <li>1. Within the Meridian Water Western Bank area, there are already over 3,000 homes consented.</li> <li>2. The consented lands do not include the IKEA site (nor the Tesco site) which is identified as being a key redevelopment opportunity, and one that can help satisfy the Borough's needs for new homes. The IKEA site alone has the potential capacity for up to 3,000 homes. This excludes the scale of development that is potentially deliverable on the Tesco site.</li> <li>3. The IKEA site is identified as being suitable for dense development.</li> </ol> <p>In view of the above, if the SPD maintains an objective that only 5,000 houses should be delivered at Meridian Water, that will render the development of IKEA at a low and understandably inefficient density</p>	Noted. See above re the 5k homes figure.
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13	Ikea	Comment	General	General	<p>It is IKEA's view that the draft SPD fails to take into account the ambitious growth plans of Enfield Council and the evident suitability of the area to provide a greater level of housing than is indicated as being deliverable within the draft SPD. In this respect, the Plan has not been positively prepared, nor is it consistent with national policy. In order to remedy this, IKEA suggest that the draft SPD should recognise that the Western Bank of Meridian Water is capable of delivering substantially more than 5,000 homes, albeit is necessary that if more than 5,000 homes are proposed, then they need to be justified by appropriate evidence.</p>	<p>Noted. See above re the 5k homes figure.</p>
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13	Ikea	Comment	4	Guiding principle 6: Commercial activity areas	<p>The site's suitability for a major employer is not denied by IKEA, however, it should not be seen as a pre-requisite of the redevelopment of the IKEA site. This is especially important if early delivery is to be achieved, as the market for major scaled commercial, cultural, creative or sport/leisure operators is limited. It is notable that the draft SPD notes that the most appropriate location for a strategic occupier is in the "Broad Band" of the IKEA site. It is, however, important that the draft SPD does not rule out other locations within the IKEA site for such an occupier, in the event that there is market demand; for example, it is recognised that the "Northern Band" is appropriate for major commercial development is appropriate for major commercial development, given that it will buffer development to the south from the North Circular, and this area should not be ruled out as a potential location for a strategic occupier. Therefore, in order to ensure that the SPD is flexible enough to respond to market demands, it is important that the provision of a strategic occupier is seen only as a potential, and its location is not fixed to the Broad</p>	<p>The SPD refers to the 'potential' for a strategic occupier. Guiding principle and supporting text amended to indicate the town centre (particularly the IKEA site) as having potential to accommodate a strategic occupier, rather than the Broad Band specifically.</p>
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					<p>Band area of the site only. Such flexibility will enable the expedient delivery of regeneration of the site, and in the interests of good planning.</p>	
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13	Ikea	Objection	4	Guiding principle 10: Tall building definition and height strategy	Whilst the Guiding Principle 10 it is guidance only it is expressed prescriptively in Guiding Principle 10, where it states that maximum heights are to be set within the Western Bank. IKEA object to the prescriptive nature of Guiding Principle 10 in this respect.	Noted. As an SPD the guidance falls short of being a policy requirement, which limits its prescriptive application. The SPS also states that "The maximum heights are recommended on a townscape and tall buildings policy basis only. Proposals above this height may be considered if other material considerations can clearly justify this (including the ability to meet other planning policy requirements and as a result of more detailed site-specific design analysis)" (4.89) - this provides flexibility and indicates that the heights stated are recommended guidance rather than prescriptive limits.
13	Ikea	Comment	4	Guiding principle 10: Tall building definition and height strategy	Figure 4.7 sets out the height strategy for the area, and identifies the areas where tall buildings are to be focussed. Whilst it is recognised that this Figure is only indicative, it is notable that there is a proposed clustering of tall buildings around the train station, and on the south west apex of the Tesco site. It is notable, however, that the north western apex of the IKEA site is not identified for a tall building cluster. In view of good urban design and efficient use	The guiding principle of which the figure forms part is indicative guidance rather than prescriptive policy. No change made in order to avoid overshadowing impacts on public spaces to the north (including Market Square).

					of sustainably located brownfield land, this part of the IKEA site is one of the most sustainable locations for a tall building cluster of a similar height to that supported on the Tesco site, and the draft SPD should recognise this.	
13	Ikea	Support	4	Guiding principle 10: Tall building definition and height strategy	IKEA support the approach to tall buildings along the main arterial routes (including the Spine Road and Angel Edmonton Road) but as noted above, the draft SPD should be used as guidance only. Furthermore, there should be express reference within the draft SPD that tall buildings outside the areas generally shown on Figure 4.7 will be considered on their merits.	Noted. The draft SPD states that 'Proposals above this height may be considered if other material considerations can clearly justify this (including the ability to meet other planning policy requirements and as a result of more detailed site-specific design analysis).' (para 4.89). No change made.
13	Ikea	Comment	6	Infrastructure Delivery	In the absence of certainty of the programme for delivering the SIW it is important that the draft SPD does not inhibit development from coming forward that can be delivered without the SIW. This would include the IKEA site. It is recognised, however,	Noted.

					by IKEA that any development of their site should not frustrate or undermine the delivery of the SIW.	
13	Ikea	Comment	6	Infrastructure Delivery	Section 6 of the draft SPD sets out the key infrastructure requirements for the Western Bank area. It is, however, notable that none of the infrastructure has been costed and the burden on development is, therefore, not currently known, nor is the viability of funding such infrastructure. Notably, Table 6.1 notes that some of the infrastructure costs are to be borne by the redevelopment of the IKEA site (amongst others). This includes a range of matters including improved bus access and services, improved train station facilities (eg, platform capacity/extension), public realm improvements and schooling infrastructure amongst other matters. There is no detail within the draft SPD of the nature of the infrastructure required, nor as mentioned above the costings, and IKEA would wish to engage further with Enfield Council to understand this detail in order to determine	The Council will work with developers bringing forward schemes to establish costs and apportionment arrangements. Where infrastructure items are intended to serve more than one development negotiations will establish suitable apportionment arrangements. The Council as promoter and master developer will work closely with developers and landowners and share indicative costs and associated information as appropriate.



					<p>whether it is viable and appropriate to provide such infrastructure. IKEA currently object, therefore, to the omission of a fully costed infrastructure delivery plan.</p>	
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13	Ikea	Comment	6	Infrastructure Delivery	<p>Specifically, in relation to the provision of school infrastructure, it is noted in the draft SPD that “the IKEA site is considered to be an optimal location for a school”. It is not clear why the site is considered an “optimal” location, nor what type of school is to be provided (albeit, in discussions with Enfield Council Officers, Quod have been informed this is intended to be a primary school). There is no evidence to demonstrate that there is a need for a further primary school, beyond that already proposed (Meridian Water 211) or to be upgraded already in existence (Meridian Angel Primary School).</p> <p>Notwithstanding the above, if it is concluded that the IKEA site is appropriate for a school and a school is necessary on this site, then funding for it should be proportionate to the needs generated by the redevelopment of the IKEA site, and other funding apportioned from other developments.</p>	<p>Supporting text 4.71 states that the site is considered an optimal location for a school because of 'the strategic location and size of this site which could place a school near the station and Green Loop/ Brooks Park in close proximity to the Main Street and the train station, and the significant mixed-use redevelopment potential of the site and the number of homes this could provide.' The Council will work with developers bringing forward schemes to establish costs and apportionment arrangements. Where infrastructure items are intended to serve more than one development negotiations will establish suitable apportionment arrangements. The Council as promoter and master developer will work closely with developers and landowners and share indicative costs and associated information as appropriate.</p>
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13	Ikea	Comment	4	Guiding principle 7: Delivering a new town centre	The draft SPD promotes the creation of a new “Town Centre” along Main Street12, as required by ELAAP Policy EL3 notes a “new town or local centre” at Meridian Water. The draft SPD, however, lacks clarity as to what scale and role is proposed for the “Town Centre” and paragraph 4.32 simply states that it should be a “large local centre” which is defined as something that is smaller than a “district centre”. Greater definition is required, to provide clarity to the development industry.	The town centre hierarchy is set out in the Core Strategy and gives further guidance on the scale and role of the town centre to be delivered at Meridian Water.
13	Ikea	Comment	4	Guiding principle 1: Movement and connectivity	Delivery of Main Street – It is proposed as part of General Principle 1 that developments are expected to deliver Main Street, although this is proposed to be delivered by Enfield Council as part of the SIW. It is, therefore, not necessary to pass this obligation on to developments.	The Strategic Infrastructure Works will deliver the road and infrastructure, and some public realm works. The guiding principle states that 'Development should <u>facilitate</u> the delivery of Main Street' (emphasis added), i.e. make possible the delivery of Main Street, including through the provision of suitable town centre activities and associated public realm.

13	Ikea	Comment	4	Guiding principle 1: Movement and connectivity	Bridges Across Rivers – General Principle 1 notes that the delivery of bridge crossings will be supported, although it is not clear who will be responsible for delivery of the bridge crossings or their functions. More so, it is suggested on Figure 4.3 that there are proposed to be two pedestrian and cycle bridges across the Pymmes Brook (and further crossings over Salmon’s Brook and the River Lee). As set out above in relation to the matters of funding and delivery, if these are to be provided by the developments of the sites adjoining these crossings, then the cost of delivery should be apportioned to all sites that will benefit from these bridges.	The Council will work with developers bringing forward schemes to establish costs and apportionment arrangements. Where infrastructure items are intended to serve more than one development negotiations will establish suitable apportionment arrangements. The Council as promoter and master developer will work closely with developers and landowners and share indicative costs and associated information as appropriate.
13	Ikea	Comment	4	Guiding principle 3: Blue and green infrastructure network	Brookes Park Expansion – It is stated that the Park proposed as part of Meridian Water 2 will expand onto the IKEA site. It is unclear what area is proposed for the Park, and whether the works proposed are feasible. Paragraph 4.25 refers to various earth works proposed on the West Bank of the Brook, i.e., on IKEA’s land, and it is unclear what earth works are proposed and if these are feasible. Greater clarity	Work is ongoing to confirm the extent of Brooks Park and associated earthworks. Engagement with the landowner will continue as proposals are finalised.

					and definition of the scale of the Park on the IKEA site is necessary, and it is understood from discussions with Enfield Council Officers that an area of circa 1.0 acre is proposed.	
13	Ikea	Comment	4	Guiding principle 3: Blue and green infrastructure network	Green Loop – General Principle 3 proposes a Green Loop as part of the masterplanning of the area, with the width indicated at “up to 20m”. Such an area of land take is substantial on the IKEA site, given that site is identified as a key contributor to the Green Loop. In this case, the future cost of provision and maintenance should be borne by all developments that will benefit from the Green Loop and costs, therefore, associated with its delivery and maintenance should be apportioned across the Western Bank developments.	The Council will work with developers bringing forward schemes to establish costs and apportionment arrangements. Where infrastructure items are intended to serve more than one development negotiations will establish suitable apportionment arrangements. The Council as promoter and master developer will work closely with developers and landowners and share indicative costs and associated information as appropriate.

13	Ikea	Comment	4	Guiding principle 3: Blue and green infrastructure network	De-culverting Pymmes Brook – Paragraph 4.28 of the draft SPD notes that the Pymmes Brook will be de-culverted, and whilst this is not objectionable in principle to IKEA, it is necessary for the draft SPD to recognise that such de-culverting should only be required where it is feasible and viable.	The revised SPD wording states 'naturalisation (including removal of the midchannel wall) and access to sufficient daylight are encouraged where feasible.' (4.35).
13	Ikea	Comment	4	Guiding principle 5: Housing and design quality	“Exemplar” Design Quality and Sustainability – General Principle 5 notes that “exemplar” design is to be sought in the developments that take place at Meridian Water. Exemplar is not defined in the draft SPD, nor is it a recognised planning term. Consequently, the reference to exemplar should be changed to “good design” which is a recognised planning term.	The word 'exemplar' is understood to be a recognised planning term - the London Plan refers to 'exemplary design' and 'exemplary architectural quality.'
13	Ikea	Comment	General	General	Spine Road/Main Street/Strategic Infrastructure Works – Throughout the document there are a number of references to these three definitions and for the sake of clarity, it is suggested that the references should be consolidated into a single definition.	Document amended to make it clear that Main Street/ central spine are the same. SIW is related but different (i.e. SIW encompasses more than just the spine road)

14	Haringey	Support	General	General	<p>This SPD policy framework will guide new development up to 2032 and remains consistent with previous Enfield planning documents that development will support the delivery of around 5,000 homes and 1,500 new jobs. It is helpful to understand more about the Council's ambitions for the type and quality of development it expects in the Western Bank area and how it proposes that the interfaces between various land uses will be managed. Haringey broadly welcomes the greater level of detail on how the vision for high quality development will be achieved on the Western Bank.</p>	Noted. Discussions on the development of specific sites will continue.
14	Haringey	Comment	General	General	<p>Engagement on specific development sites such as the former IKEA, Ravenside Retail Park, Tesco and 'Teardrop' will be important as they come forward. Haringey has Strategic Industrial Land adjacent to Meridian Water and coordination of development will be important.</p>	Noted. Discussions on the development of specific sites will continue.

14	Haringey	Comment	4	Guiding principle 7: Delivering a new town centre	We note that the Enfield Core Strategy and ELAPP indicate that Meridian Water will accommodate a new 'large local' centre – smaller than a district centre but larger and more significant than a typical suburban shopping parade. We welcome continued engagement as this proposal develops. The main purpose of this will be to ensure that the new retail centre complements rather than competes with the surrounding district centres. This was raised as a consideration in ELAPP. In Haringey, the nearby retail centres in Tottenham and Northumberland Park are also planned to undergo significant investment and regeneration.	Noted. Engagement will continue as detailed proposals develop.
14	Haringey	Comment	4	Guiding principle 1: Movement and connectivity	Haringey has been engaging with Enfield for some considerable time in relation to the delivery of Meridian Water and, as part of this process, has consistently raised the importance of Enfield providing further detail of transport and highways impacts on Haringey. This is particularly having regard to the fact that many journeys to and from Meridian Water will be via Haringey and that future improvements to	Noted.



					support Meridian Water would need to be delivered within Haringey.	
14	Haringey	Comment	4	Guiding principle 1: Movement and connectivity	We consider that the Meridian Water Western Bank SPD provides a timely and important opportunity to identify the transport and highways impacts on Haringey and to establish a robust strategy to ensure they are suitably mitigated. More work is required on the draft SPD to deliver this and we request that this is addressed ahead of the SPD being adopted by Enfield.	SPD amended to include more information on required transport infrastructure (GP1 supporting text and chapter 6). Ongoing discussions with LBH will address potential impacts going forward.

14	Haringey	Comment	6	Infrastructure Delivery	<p>Chapter 6 of the draft SPD sets out the infrastructure requirements needed to deliver the scale and type of development proposed within the SPD area. We request that transport and highways impact on Haringey is properly identified within Chapter 6 of the SPD and that the list of infrastructure requirements to support delivery is broadened, specifically to include requirements to address identified impacts on Haringey. Greater detail should be provided on infrastructure requirements (including highways, bus improvement and pedestrian and cycling routes) so that there is clarity at application stage over the expected provision of transport infrastructure and related funding including Community Infrastructure Levy and Section 106 contributions. This could be drawn from the various transport studies and assessments produced to support the emerging Enfield Local Plan, Edmonton Leaside Area Action Plan, draft SPD, as well as those submitted in support of various planning permissions.</p>	<p>SPD amended to include more information on required transport infrastructure (GP1 supporting text and chapter 6). Ongoing discussions with LBH will address potential impacts going forward.</p>
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14	Haringey	Comment	6	Infrastructure Delivery	For example, a new West Anglia Mainline pedestrian/ cycle bridge is referred to in the planning permission for strategic infrastructure works at Meridian Water (19/02717/RE3) but is not currently mentioned in the draft SPD. This should be added to the SPD as the poor walking and cycling environment is a major constraint to a successful development outcome and forms part of a key route through to the High Road and Tottenham Hotspur Stadium.	The vision diagram (Figure 3.1) shows the WAML bridge. In addition, Chapter 6 refers to the provision of bridges, including 'WAML Bridge – link across Angel Edmonton Road and railway line provide direct connection between Phase 1 and Phase 2.'
14	Haringey	Comment	6	Infrastructure Delivery	The Transport Assessment for Phase 2 of Meridian Water includes a series of recommendations for the Active Travel Zone to improve major active travel routes to and through Haringey. We believe that the need for the Meridian Water development to help fund these improvements should be made explicit within the SPD.	Noted - further information added to Chapter 6

14	Haringey	Comment	General	Guiding principle 10: Tall building definition and height strategy	As part of our New Local Plan Haringey will be producing a tall buildings strategy to identify appropriate locations for tall buildings in the borough. We note the tall building strategy for Meridian Water West Bank and would welcome continued engagement with Enfield to address any potential issues arising from tall buildings in both boroughs including properly integrating development with its surroundings. It is encouraging to see the SPD statement recognising the “need to form a coherent and varied (including height) townscape and avoid creating a “wall” of development or overdeveloping individual sites”.	Noted. Discussions on the development of specific sites will continue.
15	Environment Agency	Comment	3.1	Objectives	Point 5 Celebrating the Lee Valley waterways and open spaces (Page 17) We recommend that this has more ambitious wording e.g. “take every opportunity to restore and enhance waterways and riparian habitat, to improve geomorphology and increase biodiversity. This will provide resilience to climate change impacts and urban water quality pressures, and contribute to Water Framework Directive objectives to	Suggested wording drawn on as part of amended text

					bring waterbodies to good ecological potential.”	
15	Environment Agency	Comment	4.17	Guiding principle 3: Blue and green infrastructure network	4.17 Page 23 Suggested change: “and to naturalise watercourses and riparian habitat to provide improved geomorphology and biodiversity.”	Suggested wording drawn on as part of amended text
15	Environment Agency	Comment	Points 1 and 2	Guiding principle 3: Blue and green infrastructure network	Biodiversity and Nature Recovery page 24 1. All developments should significantly enhance the blue and green infrastructure network and restore, enhance and increase wildlife, biodiversity and geomorphology. 2. Biodiversity Net Gain – we would suggest there is a more robust ask to increase uplift (i.e. at least 20%, or separate the need to increase BNG for terrestrial and rivers separately. In urban environments this is easier to deliver than areas	Suggested text included as part of a revised point 1. However, introducing 20% BNG would effectively be introducing new policy, which is outside the remit of the SPD.

					where there is already habitat value).	
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15	Environment Agency	Comment	Points 9, 10 and 12	Guiding principle 3: Blue and green infrastructure network	<p>Blue Network</p> <ul style="list-style-type: none"> <li>• 9c &amp; d <ul style="list-style-type: none"> <li>o It should be made clearer that naturalisation is a requirement wherever possible, and that costs and complexity are not justifications for infeasibility. e.g. “not possible due to land contamination that cannot be remediated or increases in flood risk that cannot be mitigated”.</li> <li>o Please change suggestion of floating reed beds to: “sustainable and innovative urban habitat creation” and add “improvements to geomorphology” after gravels.</li> <li>o It should be noted that the opportunities to deculvert and naturalise the Pymmes Brook, Salmons Brook and River Lee should be taken, and designed into the scope of development from the beginning.</li> </ul> </li> <li>• 10 <ul style="list-style-type: none"> <li>o Surface water management should have detailed, long-lasting and accountable management plans in place to ensure they continue to filter pollutants and silt, rather than releasing them.</li> </ul> </li> <li>• 12 <ul style="list-style-type: none"> <li>o Perhaps change “maximise” to “restore”, and please add the word</li> </ul> </li> </ul>	<p>9, Part C - wording added: 'and reasonable endeavours should be taken to implement naturalisation and deculverting.'</p> <p>9, part d - change made as suggested.</p> <p>10 - suggested wording included as part of supporting text 4.28</p> <p>12 - suggested changes made.</p>
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					“geomorphology”.	
15	Environment Agency	Comment	4.21 and 4.22	Guiding principle 3: Blue and green infrastructure network	Whilst there should be habitat in all green spaces, there needs to be clear areas of designated undisturbed habitat e.g. riparian buffer zones with no footpath, lighting or amenity furniture	Supporting text 4.26 amended accordingly.



15	Environment Agency	Comment	4.23	Guiding principle 3: Blue and green infrastructure network	Perhaps write that any footpaths and cycleways need to be permeable/porous.	Text amended accordingly
15	Environment Agency	Comment	4.26	Guiding principle 3: Blue and green infrastructure network	<p>It should also say that proposals should look to naturalise as ambitiously as possible rather than doing the bare minimum. Perhaps include the Environment Agency's requirements with regards to Biodiversity, Geomorphology, Flood Risk and Contaminated Land. Could we also suggest that you ask developers to look to integrate river naturalisation with neighbouring schemes and those on the opposite bank, to maximise improvements and create a more joined up approach?</p> <p>We suggest that "feasibility studies should be undertaken to scope out the most appropriate form of river naturalisation, with a view to getting as close to fully scale restoration as feasible", should be updated as follows: "feasibility studies should be undertaken to scope out the most appropriate form of river naturalisation, with a view to getting</p>	Changes made to paragraph 4.32 to include reference to '... with a view to getting as close to fully scale restoration as technically feasible' as suggested. Further text added to reference Environment Agency's guidance. Reference to having regard to nearby naturalisation schemes added as suggested.

					as close to fully scale restoration as technically feasible".	
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15	Environment Agency	Comment	4.27	Guiding principle 3: Blue and green infrastructure network	<p>Indicates intention to prioritise green roofs (biodiversity value) and rain gardens for visual and habitat value. This doesn't follow the London Plan 2021 hierarchy (Policy SI 13 Sustainable drainage) which indicates using rainwater as a resource (rainwater harvesting, blue roofs for irrigation) first, rainwater infiltration to ground or close to source second (unlikely possible given assume confined nature of area for this development) and then rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens) third. Given this is a water stressed area, reflected in the need to adopt the higher water efficiency level for new builds detailed within Part G of the Building Regulations (London Plan 2021 Policy SI5 Water infrastructure), adopting rainwater harvesting options where appropriate (perhaps roofs of large commercial buildings &amp; schools, which could then be used for toilet flushing etc, and water butts for residential properties) could enhance the 'sustainable development' credentials of the site (detailed in the Vision) whilst also following London Plan policies.</p>	<p>Text amended as suggested to reference the GLA's drainage hierarchy, and flag rainwater as a resource as a priority. Reference made in supporting text on the need for effective SuDS maintenance.</p>
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					<p>SuDS features need a clear and accountable maintenance regime implementing to ensure these features continue to be effective, particularly with regards to sediment and pollution control measures. This is of note as there's no particular reference to ensuring these remain functional or any aspiration/ expectation/ benefit to improving the quality of water draining from the site. Surface water run-off from urban environments is impacting on our rivers, so recognising and addressing impacts of this from these developments is key.</p>	
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15	Environment Agency	Comment	4.28	Guiding principle 3: Blue and green infrastructure network	Perhaps include that developers should seek to remove the mid-channel wall wherever possible. And perhaps make this a stronger ask by requiring a feasibility study?	Point 9 of the guiding principle references the desirability for naturalisation, and 4.32 references the need for feasibility studies. Reference made as suggested in 4.35 to the removal of the mid-channel wall.
15	Environment Agency	Comment	Point 1F	Guiding Principle 4: Sustainable construction management	1f – references the use of the Lee Navigation for the delivery of construction materials and goods. Whilst I appreciate this will remove/reduce vehicle pressure on roads, this should be done in a way which doesn't cause any deterioration for this water body. I.e., travelling at a slower pace to ensure reduced impact on erosion due to bow waves, the choice of mooring location etc.	New para of supporting text added (4.40) to reference these considerations.

15	Environment Agency	Comment	5.2	Ravenside Retail Park	<p>Whilst there is reference to “activating the waterside setting, and incorporate elements of the green network, including the Green Loop and Lee Navigation Linear Open Space”, there’s no specific reference to the Salmons Brook which runs through this site. This is a direct contradiction to the Pymmes Brook, which is specifically referenced within the high level guidance related to the MW5.3: Tesco site. It’s strongly recommended that the Salmons Brook is referenced within the high level guidance related to the MW5.2: Ravenside Retail Park site, with requirement to restore the channel and riparian corridor through development.</p>	Text included to state 'Investigate the potential to naturalise Salmons Brook and improve the riparian corridor.'
16	National Grid	Comment	General	General	<p>Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to National Grid assets. Gas Transmission - ZBD ROUTE: 275Kv Overhead Transmission Line route: BRIMSDOWN - TOTTENHAM - WALTHAM CROSS 1</p>	Noted

17	Canal and River Trust	Support	3.1	Objectives	<p>We strongly believe that the Navigation can play a central role in placemaking within Meridian Water, and it is therefore encouraging and positive to note that overall this is acknowledged within the SPD. There are many supporting statements about the role the Navigation can play in the development of Meridian Water and, more generally, it is positive that blue-green infrastructure is seen as an integral part of the approach to placemaking, and the Lee Navigation is included in the key SPD objectives (3.1) in terms of North-South connectivity, and in celebrating the Lee Valley waterways and open spaces.</p>	Noted
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17	Canal and River Trust	Comment	4	Guiding principle 1: Movement and connectivity	<p>It is encouraging that the Trust are identified as a key stakeholder and developers are encouraged to engage with the Trust on any proposals for new bridge crossings (Para 4.6) We would suggest that this should be expanded to encourage early engagement with the Trust on all development proposals adjacent, or close to the Navigation.</p> <p>The Trust have previously suggested that the towpath and Towpath Road should be within the scope of this SPD. It is understood that the intention is for the SPD area to extend only up to the eastern bank of the Navigation with the towpath and Towpath Road outside the scope of the SPD. As a result, this feels somewhat like a retrograde step compared to the detailed proposals in the Towpath Strategy. Nevertheless, the red line boundary within the draft document (Figure 1.1) seems to include some land beyond the eastern bank and the extent of the SPD area should therefore be clarified and the plan amended accordingly.</p>	<p>The desire for early engagement on development proposals adjacent or nearby the Navigation is noted. Towpath Road has been excluded from the SPD area because of wider strategic issues relating to the SIL land of which Towpath Road forms part. Figure 1.1 amended to show an SPD boundary along the eastern bank of the River Lee Navigation, excluding SIL land, for the sake of accuracy and clarity.</p>
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17	Canal and River Trust	Comment	4	Guiding principle 2: Carbon reduction	<p>The Trust wish to highlight the potential of the Navigation for heating &amp; cooling and the document could be amended to include reference to this potential of the waterway network to contribute to low carbon technologies.</p> <p>Applicants/developers should be encouraged to discuss the options in relation to this, and any commercial agreement that would be required, with the Canal &amp; River Trust. More details can be found on our website: Heating and cooling systems   Canal &amp; River Trust (<a href="http://canalrivertrust.org.uk">canalrivertrust.org.uk</a>)</p>	New supporting text added at 4.20.
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17	Canal and River Trust	Comment	4	Guiding principle 3: Blue and green infrastructure network	<p>This section sets out the proposals for the 'Green loop' with Figure 4.4 giving an indication as to how this may be laid out along sections where there would be built development to both sides. The Green loop though also extends along the western bank of the Navigation and in those circumstances, there would only be built development to one side. It is important that the document acknowledges that a different approach would be required where there is a water frontage to consider. In addition, there is reference to 'river naturalisation' (Para 4.26) and it should be clarified that the approach to Pymmes Brook would differ from that required for the River Lee Navigation. Any proposals would need to consider and ensure there would be no adverse impact to the structural stability, operation, or safe navigation of the waterway. Any landscaping would need to be native species appropriate to the waterside location with details on future maintenance and management regimes and responsibilities also provided for consideration. This principle could also recognise the urban cooling benefits of blue</p>	<p>Text added to 4.30 to recognise water frontage of the Green Loop at the Navigation. References to 'river naturalisation' changed to 'watercourse naturalisation' to avoid confusion between intentions for the brooks/ River Lee Navigation. Cooling benefits of blue spaces referenced in point 7. Text added to 4.33 to state 'Any surface water discharge to the River Lee Navigation would require prior consent from the Canal &amp; River Trust.'</p>
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					<p>spaces in the same way that the green infrastructure section does (point 7). There is reference to surface water management measures, and we wish to highlight the potential for surface water drainage to the Navigation. Any surface water discharge to the waterway would require prior consent from the Canal &amp; River Trust. Full details of any proposed discharge would need to be submitted and include appropriate mitigation measures to ensure there would be no adverse impact to water quality or structural integrity of the waterway. As the Trust is not a land drainage authority, such discharges are not granted as of right-where they are granted, they will usually be subject to completion of a commercial agreement.</p>	
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17	Canal and River Trust	Comment	4	Guiding principle 4: Sustainable construction management	Point 1a) should be expanded to require construction compounds to be located away from sensitive receptors, both human and environmental.	Point 1a amended to reference sensitive receptors.
17	Canal and River Trust	Comment	4	Guiding principle 7: Delivering a new town centre	This seeks to concentrate town centre activities around the train station, along Main Street and adjacent to where Main Street converges with the Navigation, identified as 'riverside square'. There seems to be further opportunity here to encourage consideration of facilities and access for water-based activities. It would also be positive if the document could include reference to moorings, both short-stay and longer 14 day or permanent moorings and the provision of boater facilities such as water, waste, Elsan and pump out and electric shore based power.	Paragraph 4.62 amended to address the issues as suggested.
17	Canal and River Trust	Comment	4	Guiding principle 9: Managing transitions	It may be beneficial to include more detail in relation to the approach to transitions from/to Blue/Green infrastructure and consideration of the impacts of industrial uses on the natural environment and users of the	Text on transitions added to 4.79. The impacts of industry on the natural environment and waterway is addressed through higher level policy and environmental legislation.

					waterway.	
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17	Canal and River Trust	Comment	4	Guiding principle 10: Tall building definition and height strategy	<p>This principle seeks to establish a tall building strategy for the SPD area. Area 2 covers the western bank of the Navigation and much of the SPD area. The strategy as currently drafted identifies 39m as a local definition for this area with tall cluster buildings, up to 69m and 57m along the spine road. The Trust are concerned with this approach to heights adjacent to the Navigation, and the proposal for tall 'nodes' around the bridges, especially if these are to be associated with open spaces which may become less attractive if bounded by excessively large buildings. The approach to tall buildings within the SPD would also seem to be at odds with Policy EL11 of the Edmonton Leaside AAP which seeks to ensure that buildings conform to height, width ratio appropriate for the street, avoid locating tall buildings on adjacent corners to prevent a 'fortress like' visual impact, avoid creating a 'wall of tall buildings and compromising the enjoyment of open spaces, including water spaces through overshadowing. The Trust therefore consider that an 'Area 3' should be included along the Navigation with figure 4.6 amended to require a step</p>	<p>The local definition proposal has been omitted from the SPD in response to representations received as part of public consultation.</p> <p>The existing policy framework, when read as a whole, contains appropriate policies to prevent undue negative impacts on open spaces. This is reinforced at paragraphs 4.90 and 4.91.</p> <p>However, it is considered that the bridge location, public open space and eastern portion of the high street are an appropriate location for tall buildings, in line with Policies D1,2,3,9 and CCG 2 of the London Plan: This is an important route, crossing point and activity hub for the area.</p> <p>The SPD does not contradict Policy E11 of ELAAP. Paragraphs 4.90 and 4.91 are clear that the height zones to not allow a blanket approach and all other considerations necessary for good design are still relevant. Any proposal would be subject to microclimatic modelling to ensure undue overshadowing is avoided.</p>
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					<p>down to the Lee Navigation. In addition, figure 4.7 should also be amended to require a step down in building heights along the spine road as it approaches the new Lee Navigation crossing. Preferably this would apply both north and south of the spine road, though designing a step down on the southern side would be particularly important for creating an attractive riverside square on the northern side (as set out in guiding principle 7).</p>	
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17	Canal and River Trust	Comment	6	Infrastructure Delivery	It has been confirmed verbally with Council Officers that the reference to 'Meridian Water towpath' within Table 6.1 in fact relates to the new path to be created on the off-side. This should be made clear in the SPD though there seems to be no reason why this table could not also include infrastructure outside of the SPD area (as it does already for emergency services). The Table should therefore be amended to include reference to improving the towpath / Towpath Road in accordance with the principles of the Towpath Strategy, given the role the towpath plays in providing access to the Lee Valley Regional Park.	Terminology to be changed in table 6.1 to clarify - Lee Navigation western bank rather than towpath.
18	Swifts Local Network - Swifts & Planning Group (London)	Support	4	Guiding principle 3: Blue and green infrastructure network	The Biodiversity and Nature Recovery section under Guidance Principle 3 (page 24), and other references to biodiversity, are very welcome, especially given the close proximity to the Lee Valley SPAs and SSSIs. However, new immature habitats provide no opportunity for cavity-nesting birds to nest and roost, nor for bats to roost, as these require older buildings or mature trees which are absent from an	Noted. There is indeed a lack of mature trees, though improvements to the green network should provide mature trees over the coming years.



					immature landscape.	
18	Swifts Local Network - Swifts & Planning Group (London)	Comment	4	Guiding principle 3: Blue and green infrastructure network	Therefore, we request that as a minimum you include this relevant statement from the National Planning Policy Guidance 2019 Natural Environment paragraph 023: "Relatively small features can often achieve important benefits for wildlife, such as incorporating 'swift bricks' and bat boxes in developments and providing safe routes for hedgehogs between different areas of habitat." If you are able to add further detail, please state that swift bricks should be installed in accordance with best-practice guidance, which for example is provided by CIEEM. They provide advice with regard to location and numbers.	Points included as part of new para 4.5.

19	GLA	Support	General	General	The Mayor welcomes the development of the area-based guidance as part of a design led approach to delivering good growth in this key area of regeneration. The document provides a clear vision for change as well as priorities which build upon those set out within the adopted Edmonton Leaside Area Action Plan (ELAAP) (2020), the Enfield Core strategy (2010) and the Enfield Development Management policies (2014).	Noted
19	GLA	Comment	General	Guiding principle 10: Tall building definition and height strategy	However, due to the timing of the Enfield Local Plan refresh (with a regulation 18 version consulted upon early in 2021), there are issues with the extent of guidance set out within the draft SPD in relation to tall buildings which should be addressed prior to its formal adoption.	Noted. Follow-up meeting held with the GLA to clarify and discuss issues identified in the representation.

19	GLA	Comment	4	Guiding principle 10: Tall building definition and height strategy	<p>None of these DPDs include a quantitative local tall buildings definition and, whilst the ELAAP notes the 'strong rationale' for tall buildings within the Meridian Water area (para.5.11.7), none of these DPDs map out locations appropriate for tall buildings or set appropriate heights within those locations. Despite this, within Guiding Principle 10: Tall buildings (GP10), the draft SPD introduces a new local definition for tall buildings, includes specific heights which might be considered appropriate as well as locations where tall buildings would be an appropriate form of development. Whilst the Mayor supports the strategy for tall buildings put forward, the level of detail provided within the draft document is not considered appropriate for inclusion within a Supplementary Planning Document in the absence of a formal policy basis. As per the requirements of Policy D9, such a strategy should have the benefit of being included within a formal DPD and thus the subject of a full examination process to ensure that it is afforded full weight in planning decisions and is</p>	<p>Meeting with the GLA held Jan 2023 and changes agreed. New local definition removed, and text included to confirm guidance will be incorporated into draft Local Plan.</p>
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					therefore effectively implemented.	
19	GLA	Comment	4	Guiding principle 10: Tall building definition and height strategy	Rather than attempting to introduce new policy criteria, the SPD presents an opportunity to highlight the conflict between your existing Local Plan and LP2021, and to clarify how the new approach set out by LP2021 Policy D9 is to be brought forward into your DPD as part of your next Local Plan review process.	Meeting with the GLA held Jan 2023 and changes agreed. New local definition to be removed, and text included to confirm guidance will be incorporated into draft Local Plan.

19	GLA	Comment	4	Guiding principle 10: Tall building definition and height strategy	It is therefore recommended that the more problematic elements of the draft SPD discussed are migrated across into the draft Local Plan and consulted upon as part of your regulation 19 process. The general presumption that the SPD area contains a 'strong rationale' for tall buildings as set out within the ELAAP may still be referred to and strengthened within the SPD for clarity.	Meeting with the GLA held Jan 2023 and changes agreed. New local definition to be removed, and text included to confirm guidance will be incorporated into draft Local Plan.
19	GLA	Comment	4	Guiding principle 10: Tall building definition and height strategy	Subject to the removal of the more authoritative elements of guiding principle 10 and associated figures, the draft SPD is welcomed and represents a major contribution towards a plan-led approach to good growth in the borough. This would include the more general design requirements for tall buildings developments within the draft SPD which act to guide the implementation of, for instance, ELAAP policy EL11 (Building form at Meridian Water).	Noted.

19	GLA	Comment	4	Guiding principle 10: Tall building definition and height strategy	It is also noted that prior to the formal adoption of the new Local Plan, decision makers may justifiably place weight upon the emerging local plan policies and associated evidence base (e.g. Character and Growth Study) as these clearly indicate the direction of travel for future policy.	Noted, though the draft Reg 18 Local Plan was consulted upon during summer 2021, meaning it is at a relatively early stage of preparation and as such as relatively little weight in decision making.
19	GLA	Comment	4	General	London Plan policy D12 seeks the highest standards in fire safety. The draft Fire Safety London Plan Guidance requires developers to provide a rigorous assessment of the number of stair cores provided based on factors such as the proposed evacuation strategy, the height of the building, the number of fire evacuation lifts, and the anticipated number of occupants and to include clear mitigation measures, where required, to ensure safe evacuation in the event of an emergency. Following the Grenfell Fire, increasingly occupants are choosing to self-evacuate during fire incidents even where a stay put evacuation strategy is in place. This change in behaviour needs to be considered when developing the fire strategy for tall residential buildings	New text included as part of 4.44 as suggested.

					and robust design solutions incorporated into tall buildings. The issue of fire safety that arises by provision of single staircase in tall buildings should be addressed appropriately in the draft SPD as noted in the NFCC statement on 14th December 22. The draft should require adherence to current and future fire safety regulations and refer to draft London Plan Guidance on fire safety.	
19	GLA	Comment	4	Guiding principle 9: Managing transitions	The SPD acknowledges the scope for conflict between the various uses which Guiding Principle 9 addresses to some degree. However, an explicit reference within the SPD to locating buffer uses within the masterplan area where this lies adjacent to waste and industrial sites, as opposed to within the adjacent SIL, LSIS and waste sites, would help in ensuring the effective	Suggested wording added to 4.77.

					operation and functioning of adjacent waste and industrial uses.	
20	Lee Valley Regional Park Authority	Support	3.1	Vision and objectives	The Authority supports the Vision concept for the Meridian Water Western Bank as a highly sustainable mixed use community. The emphasis placed on “improved and restored waterways and new open space” within the Western Bank to “knit this new community” into the Regional Park will be important to ensure sufficient space of good quality and variety is provided to meet the needs of new residents and employees.	Noted
20	Lee Valley Regional Park Authority	Comment	3	Vision	The Vision statement should make reference to the creation of Brooks Park and indeed its possible extension westwards within the former Ikea site. Its waterside location and proximity to the Regional Park at Tottenham Marshes offers significant opportunities for leisure and	The Vision statement needs to be succinct; it currently refers to waterway improvements and the green network, with further details provided by the guiding principles.



					recreation on a meaningful scale.	
20	Lee Valley Regional Park Authority	Comment	3.1	Objectives	The open spaces within the Regional Park are under increasing recreational pressure from new users or visitors due to the level of growth planned or currently being developed along its boundaries. It is fundamental to the quality of the new communities such as MWWB, and the wider environment benefits of the Regional Park that new development and co-ordinated regeneration of areas such as Meridian Water create spaces for people's enjoyment, leisure and well-being from the outset as an integral part of the areas transformation.	Noted
20	Lee Valley Regional Park Authority	Support	3.1	Objectives	The objectives highlight the need for the MWWB to connect to and celebrate the Lee Valley Regional Park, and to enhance blue/green networks, and this is welcomed. But equally more detail is required as to how the MWWB will create and embrace new areas of public open	The SPD sets out guidance on the creation of the green network, including the Green Loop. The detailed design and management of these elements will be established through the Development Management process.

					green space within its own site boundary, and how these will be safeguarded and managed as a sustainable resource for the long term.	
20	Lee Valley Regional Park Authority	Comment	3.1	Objectives	Objective 4 which is focused on delivering sustainable regeneration starts to address this where it identifies the need to “Ensure an uplift in biodiversity across the site through the provision of new multifunctional green spaces linking to existing green networks, and naturalisation and restoration of watercourses”. Substantial areas will need to be provided within the MWWB to provide sufficient room for both biodiversity and recreational/leisure needs. Connecting this ‘scale’ of resource with the Regional Park’s spaces and habitats will contribute positively to placemaking at MWWB extending the Park into the Western Bank.	Noted
20	Lee Valley Regional Park	Support	4	Guiding principle 1: Movement and	The emphasis on active travel is supported.	Noted

	Authority			connectivity		
20	Lee Valley Regional Park Authority	Comment	4	Guiding principle 1: Movement and connectivity	The design of development proposals should place the highest priority on walking and cycling particularly within the street network, public realm and open spaces. However, there is also a need to integrate and connect the Western Bank with its surroundings and this should include the Regional Park. The SPD guidance identifies the new links needed to connect with the surrounding area including foot and cycle links over the railway in the west, from Main Street which runs through the centre of the Western Bank site and via bridges (for cyclists, buses and pedestrians) over the Lee Navigation, Pymmes and Salmons Brooks.	Noted. The Guiding Principle 1 makes explicit reference to connections to Lee Valley Regional Park.
20	Lee Valley Regional Park Authority	Support	4	Guiding principle 1: Movement and connectivity	Connections from Main Street, the central route from the station through to the rest of Meridian Water are welcome – they will enable people to access Edmonton Marshes in the Park and move onto the Lee Navigation towpath to travel north and south further into the Park, connecting with key venues such as	Noted

					the Lee Valley Leisure Complex at Pickett's Lock and Walthamstow Wetlands.	
20	Lee Valley Regional Park Authority	Comment	4	Guiding principle 1: Movement and connectivity	Supporting text references the importance of bridge crossings as high quality placemaking features sympathetic to the waterways beneath especially where these form part of the canal edge or towpath. This detail should form part of the formal guidance under GP1 – the Navigation and its towpath form part of the Regional Park in Enfield and the SPD shows at least 3 crossings over the Navigation; Guidance should consider the cumulative impact of these crossings particularly in terms of their visual and ecological impact on the waterway corridor.	Relevant text moved into Guiding Principle 1 at part 6. Cumulative impact point addressed in amended wording at para 4.7.
20	Lee Valley Regional Park Authority	Comment	4	Guiding principle 1: Movement and connectivity	The SPD also needs to address links south onto Tottenham Marshes. This would need to come forward as part of the improvements to Leaside Road, a key east west connecting route along the southern boundary of the Western Bank identified under	Links to Tottenham Marshes referenced in new point 5 f of Guiding Principle 1.

					the guidance to be enhanced as part of development.	
20	Lee Valley Regional Park Authority	Comment	4	Guiding principle 1: Movement and connectivity	Leeside Road is an important point of access into Tottenham Marshes via the existing Leeside footbridge and the future of this connection remains unclear. This matter was raised in the Authority's response to the reserved matters application for residential led redevelopment of the former Gasholder Site off Leeside Road, Plot Z02-01 of Phase 2 (our ref: RP/61/22). The SPD should support the creation of a safe and attractive gateway or access point into the Regional Park at this point and provide guidance to secure this improvement as part of development and infrastructure proposals linked to the public realm interventions.	Reference made at para 4.5.

20	Lee Valley Regional Park Authority	Support	4	Guiding principle 3: Blue and green infrastructure network	<p>The content of Guiding Principle 3 Blue and Green Infrastructure Network is supported. The emphasis on enhancing biodiversity and maximising opportunities for nature recovery is welcomed and reference to the Lee Valley Biodiversity Action Plan is helpful as the Authority would wish to see habitat creation and native planting within MWWB that complements the adjoining Park areas. The Authority supports the Council in seeking to achieve a 10% Biodiversity Net Gain and would encourage this to be the minimum sought through development given the likely low base from which this assessment will be calculated. Guidance should specify that the BNG will need to be provided on site within the MWWB.</p>	<p>Guiding Principle 3 part 2 references 10% as a minimum. Part 2 amended to flag the expectation that this should be provided on site.</p>
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20	Lee Valley Regional Park Authority	Comment	4	Guiding principle 3: Blue and green infrastructure network	<p>Guidance also proposes that new spaces and habitats should be designed to link up with existing green and blue assets and connect with existing Sites of Importance for Nature Conservation (SINCs). In principle this is supported, although Guidance should be clear that this would include the River Lee Navigation Site of Metropolitan Importance for Nature Conservation (SMINC). The Authority's PDF Biodiversity Area Proposals 4.A.2 highlight the importance of habitat creation to strengthen ecological connectivity between the reservoir Site of Special Scientific Interest, i.e. William Girling in the north and the waterway and open grassland habitat on Tottenham Marshes. Proposals also seek to ensure that "New waterside space proposed alongside the River Lee Navigation in the Meridian Water Masterplan should include appropriate waterside habitat creation to aid establishment of an ecological corridor"</p>	Supporting text 4.26 amended to explicitly reference the River Lee Navigation Site of Metropolitan Importance for Nature Conservation (SMINC)
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20	Lee Valley Regional Park Authority	Comment	4	Guiding principle 3: Blue and green infrastructure network	Making these landscape scale connections between MWWB and sites beyond its boundary is important but this will require careful design and management of habitats and biodiverse features provided as part of development to ensure the same spaces do not face unsustainable pressure from recreation/leisure use that devalues biodiversity.	Noted.
20	Lee Valley Regional Park Authority	Comment	4	Guiding principle 3: Blue and green infrastructure network	The waterway corridors and associated waterside open space within MWWB are an example. Guidance identifies these features as part of the Green Loop, a continuous linear park with an optimum width of 20 to 30 metres which loops through the heart of Meridian Water providing open space, pedestrian footway and two way cycle route and other amenities. The design and long term management of this feature will require careful consideration to ensure a biodiversity function can succeed. Proposals for the extension of the Lee Navigation linear open space as a north south movement corridor for people and spill out area for public activity relating to adjacent	The role of the River Lee Navigation Open Space made clearer - see additional supporting text at 4.28.



					development and creation of a new public 'Riverside Square' part of the proposed Town Centre, is also unlikely to offer much biodiversity value in the long term. Guidance needs to be clear as to the primary role of the waterways and how the various demands can be balanced.	
20	Lee Valley Regional Park Authority	Support	4	Guiding principle 3: Blue and green infrastructure network	The requirement for development to reduce flood risk through sustainable and natural flood risk management is supported. The naturalisation and de-culverting of Pymmes Brook would be welcome, although as stated in the SPD this would require detailed feasibility work.	Noted

20	Lee Valley Regional Park Authority	Comment	4	Guiding principle 3: Blue and green infrastructure network	<p>It is understood that as part of the creation of Brooks Park a section of Pymmes Brook will be naturalised and this is identified as a project within the Infrastructure Delivery Plan included in the SPD. The Authority's previous comments on this proposal (in its response to the Gas Holder application) sought the inclusion of channel softening alongside the development's boundary with Pymmes Brook. It was suggested that floating reedbeds and Sand Martin nest holes might be incorporated as part of these softening works. It is understood that proposals for channel softening are being discussed with the EA.</p>	Noted. Ongoing discussions are continuing.
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20	Lee Valley Regional Park Authority	Comment	4	Guiding principle 4: Sustainable construction management	<p>Guidance needs to be included on lighting, and an additional Guidance Principle should be added, in particular to ensure sensitive lighting schemes are considered as an integral part of development and to ensure developments avoid light pollution.</p> <p>This will be of particular relevance where development overlooks the waterways such as the Lee Navigation and open spaces such as Brooks Park and Tottenham Marshes, and where maintaining dark corridors and spaces are important for biodiversity. The 'Institute of Lighting Professionals (2018) Bats, and Artificial Lighting in the UK Guidance Note 08/18' should be used to inform development and lighting strategies.</p> <p>Lighting is a matter that should also be covered in guidance relating to Sustainable Construction Management under GP 4. Construction Environmental Management Plans will be an important mechanism for minimising disturbance within the adjoining areas of the Park, particularly given that development within the Western Bank will be phased over a lengthy</p>	<p>Additional point regarding lighting considerations added to Guiding Principle 4 part f.</p> <p>Additional point on lighting added to Guiding Principle 9 at point 5, with associated supporting text added at 4.76.</p>
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					period of time.	
20	Lee Valley Regional Park Authority	Comment	4	Guiding principle 8: Social infrastructure	Reference under GP 8 'Social Infrastructure Provision' to the provision of flexible indoor and outdoor sports and leisure facilities is noted. Guidance should make reference to the facilities within the adjoining areas of the Regional Park, such as the Athletics Centre at Pickett's Lock and future sports and recreational provision on Edmonton Marshes. Complementary provision and programmes should be	Additional text added accordingly to paragraph 4.72.

					encouraged.	
20	Lee Valley Regional Park Authority	Comment	4	Guiding principle 10: Tall building definition and height strategy	The guidance on tall building should allow for a considerable reduction in height where buildings are positioned adjacent or close to the Regional Park, in particular Tottenham Marshes in the south and alongside the River Lee Navigation in the east. The Authority's Landscape Strategy and proposals seek the restoration of poor quality and fragmented landscape character, protecting and enhancing the openness of the valley floor to the north and south of the North Circular. In respect of Tottenham Marshes (Landscape Character Area (LCA) C2) the Landscape Strategy notes "Where tall buildings begin to intrude on views and diminish the sense of scale and openness that the marshland has, this affects the sense of the area as a semi-natural space, removed from and providing a break between busy urban areas that abut it". The strategy states that	Extant planning consents establish heights close to LVRP boundary. The height strategy steers tall buildings away from peripheral locations to the station/ town centre.

					areas where open skylines predominate should be protected.	
20	Lee Valley Regional Park Authority	Comment	4	Guiding principle 10: Tall building definition and height strategy	The Lee Navigation falls within LCA F1 'Peri-urban Valley Floor'. Strategy Guidelines state "Ensure any future development protects existing valued features and enhances the landscape framework across the area - it should demonstrate careful design that integrates development physically, visually and functionally into the wider LVRP landscape".	Noted

20	Lee Valley Regional Park Authority	Comment	4	Guiding principle 10: Tall building definition and height strategy	<p>An additional guidance point 3 should be added under GP10 to reflect the above Strategy – the following wording is suggested for consideration: Guiding principle 10 Tall Building definition and height strategy</p> <p>3. The height of buildings positioned close to the Regional Park should step down towards the Park in particular the open spaces at Tottenham Marshes and alongside the River Lee Navigation respecting and announcing the transition to areas of open space and the waterside environment, enabling views out across the Lee Valley to be retained and enhanced.</p>	Extant planning consents establish heights close to LVRP boundary. The height strategy steers tall buildings away from peripheral locations to the station/ town centre.
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20	Lee Valley Regional Park Authority	Comment	5.2	Ravenside Retail Park	<p>A number of the points raised above will be relevant to future development within the Ravenside Retail Park area, identified as a key site within the SPD and located adjacent to the River Lee Navigation. The specific 'high level' guidance currently included references the need to:</p> <p>“Activate the waterside setting, and incorporate elements of the green network, including the Green Loop and Lee Navigation Linear Open Space”</p> <p>This guidance is supported but the level of activation will need to consider the location of the site adjacent to the River Lee Navigation and balance other requirements such as provision for biodiversity, sensitive lighting, and safe routes for people as part of the Green Loop.</p>	Need for balance emphasised through additional supporting text at 4.28.
20	Lee Valley Regional Park Authority	Support	6	Infrastructure Delivery	<p>The wide range of infrastructure identified in the SPD is noted and the detail of the site related infrastructure requirements is helpful in understanding the level of detail still to come in terms of securing green and blue infrastructure, bridge links and pedestrian and cycle routes that will connect the Meridian</p>	Noted



					Water Western Bank with the Regional Park and deliver substantial new public open space within the Park's boundaries.	
20	Lee Valley Regional Park Authority	Comment	6	Infrastructure Delivery	The Authority should be consulted on these elements to ensure new green networks and open spaces are complementary to the Park's open spaces and recreational offer and the Authority's aims and future aspirations for the Regional Park. The detail of physical links, pathways and cycle routes between MWWB and the Park need to be agreed with the Authority to ensure a co-ordinated access and wayfinding strategy for the whole SDP area. This is important if funding and delivery is likely to be triggered by the development on a plot by plot basis and secured via developer contributions (S106 or Community Infrastructure Levy) or direct provision by developers.	Engagement with the Lee Valley Regional Park Authority will continue as detailed proposals for sites are brought forward.

20	Lee Valley Regional Park Authority	Comment	6	Infrastructure Delivery	Included within the site related infrastructure category are the Green and Blue Infrastructure elements referred to in the SPD Guiding Principle 3, such as the Green Loop which will include improved access to the Regional Park and is intended to deliver biodiversity and flood attenuation. The trigger for these elements will be development on Phase 2 sites – Ikea, Tesco and the Ravenside Retail Park and the Authority should be involved in the detail of these infrastructure elements as early as possible in the development process to ensure they are complementary to the adjoining Park areas and improve connectivity and biodiversity. A similar course of action is required for the proposed pedestrian and cycle bridge crossings over the Lee Navigation and Pymmes Brook at Leaside.	Engagement with the Lee Valley Regional Park Authority will continue as detailed proposals for sites are brought forward.
20	Lee Valley Regional Park Authority	Comment	6	Infrastructure Delivery	The Authority would welcome further discussion on these matters particularly as the detail of some infrastructure designs and works are progressing and would welcome the opportunity to engage further on the detail of guidance contained within the SPD as it is amended following	Noted

					this consultation.	
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