



Strategic Planning and Design Team
Enfield Council
By email only

14 June 2019

Dear Neeru Kareer

Edmonton Leeside Area Action Plan examination: Proposed Main Modifications

Thank you for your consultation.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.

Statement of Common Ground

The Trust notes that many of the changes agreed in the Statement of Common Ground between the Trust and the Council in October 2018 have been included in the main and additional modifications proposed by the Council. We remain supportive of these changes. The one change from the Statement of Common Ground that has not been made is the one proposed to policy EL24 (Use of the Waterways for Transportation) to add the following additional point:

- *Residential uses and other commercial uses, where appropriate.*

On further reflection, in the context of policies EL12 and EL27 (as amended), the Trust is content that this change is not required in the interests of the soundness of the plan. We have no objection to its exclusion from the main modifications schedule.

Other changes proposed in the Main Modifications

MM2a - 5.11.13

The Trust has general concerns about the Environment Agency's guidance that a requirement for a minimum 8m set back from the top of river banks should be included in local plans. We suggest that, in the case of the Trust's waterways, it is preferable to make a site-specific judgement about the proximity of development to the water, given that, amongst other things:

- Whilst they are multifunctional assets, their navigation by boats is a key function and therefore re-naturalisation and habitat improvements must be consistent with this.

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- The fact that they are navigable means that for much of their length they are less reliant on land access for maintenance.
- Their towpaths are recreational and sustainable transport assets that benefit from appropriate levels of natural surveillance.

The requirement for an 8m buffer may prove to be inconsistent with the improvements to the public realm and natural surveillance along the River Lee Navigation that the plan otherwise seeks to achieve. In this context, we welcome the fact that the proposed wording stops short of making the 8m setback a requirement and does not include it in policy. We would suggest, however, that the following text is added before the final sentence (beginning “where”) in the proposed amendment.

Exceptions may be acceptable for the River Lee Navigation where a smaller buffer would result in a better environment or facilities for users of this multifunctional asset and where it can be demonstrated that there would be no adverse impacts on flood risk, flood defences and the natural environment is enhanced.

Such wording was recently agreed with the Environment Agency and Council during the examination of the Epping Forest Local Plan.

MM6: Policy EL6

We note that the policy proposes a new Masterplan SPD. We look forward to working with the council on this document and would welcome early engagement, given that the proposals include a significant length of canal frontage and a new bridge over the canal.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

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<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>

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