



EDMONTON LEESIDE AREA ACTION PLAN

EXAMINATION

Final

Hearing Position Statement

Matter 8: Infrastructure

Issues: Whether the Plan makes appropriate provision for Infrastructure to serve the needs of proposed development, including community and cultural facilities and services to meet local needs. Does the Plan adequately accommodate the operation of existing strategic infrastructure providers?

i. Would the policies in the plan make adequate provision for future needs for:

a. Health care (including mental health provision, GPs and secondary care)

b. Education

c. Sports and open space

d. Other community uses and infrastructure

Are the assumptions made about “dual –use” realistic and achievable?

The Council has consulted with and signed Statements of Common Ground with representatives on the subject of infrastructure, including Sports England and Healthwatch Enfield. In these statements of common ground, agreement is made on the fact “that it is important to positively plan for sport, recreation and healthier lifestyles by preventing the unnecessary loss of sports facilities and having an integrated approach to providing new housing, employment land and community facilities”.

Agreement was also reached on the following: “that health and wellbeing is critically important to creating a successful new neighbourhood within Edmonton Leaside” and on an amendment of AAP text to state that the AAP will “Enhance health and wellbeing through enabling healthy lifestyles and ensure that everyone has good access to health, leisure and community facilities of a high standard within proximity to their home”;

On healthcare particularly it is agreed “appropriate modern healthcare facilities must be delivered as development progresses at Meridian Water taking account of the changing pattern of delivery of health and care services and in support of the ‘enhance health and wellbeing’ objective. Policy EL5 requires that delivery of health facilities is on the basis of housing proposed and makes clear that the facilities must be in accessible locations”.

Policy EL5 on Community Facilities in Meridian Water, Policy EL9 of the AAP on Leisure Facilities and Open Space at Meridian Water, as well as policy EL27 on Watercourses at Edmonton Leaside and EL28 on New and Existing Green Spaces and a number of policies on transport place extensive emphasis on ensuring that Edmonton Leaside and especially Meridian Water development is comprehensively underpinned by infrastructure including community and cultural facilities and services to meet local needs.

In terms of implementation, these plans are substantiated by a clear commitment to funding necessary infrastructure through CIL and Section 106 planning obligations (see AAP page 152-153) in line with the Council's CIL Regulation 123 List and Section 106 SPD, as well as through AAP policy EL13 on Infrastructure Delivery in Meridian Water. The latter states that "Development within the Meridian Water boundary will be subject to financial contributions towards infrastructure requirements secured on all developments liable for CIL or section 106 planning obligations.

The Council is bringing forward a new Local Plan and undergoing a CIL review to ensure that its CIL approach remains relevant to current policy and circumstances.

Regarding accommodating the operation of existing strategic infrastructure providers, the Council has been consulting with and is currently working with Transport for London, Arriva, the North London Waste Authority, the Environment Agency, Thames Water and the Lee Valley Regional Park Authority to draft and sign statements of common ground. These will recognise and enshrine the council's commitment to working with existing infrastructure providers for the best possible outcome for local residents and to accommodating providers' needs as part of ELAAP and Meridian Water.

Regarding assumptions of "dual use", we assume the Inspector is referring to mixed use.

As regards assumptions of mixed use in the AAP, the AECOM evidence base work from 2016 and KCA's design work can be considered realistic and achievable on the basis of looking at existing precedents from other successful plans and developments.

ii. Is the plan based on realistic assumptions in relation to the capacity to provide supporting infrastructure at higher densities? What is the justification for the standards used in the scenario testing?

The Aecom report Edmonton Leaside Area Action Plan Evidence on Housing and Supporting Infrastructure [ELAAP 12] undertakes a thorough assessment and clearly sets out the methodology and standards used to assess each type of infrastructure including education, primary healthcare, open space, culture and leisure. It also sets out the assumptions which informed the individual development scenarios.

To illustrate, for open space, the LBE Open Space and Sports Assessment Update (2011) provides details of the borough's existing provision in terms of ratios of provision per 1,000 residents. Aecom subsequently used the MALP open space hierarchy to examine public park supply. It then uses the GLA's Shaping Neighbourhoods: Children and Young People's Play and Informal Recreation Supplementary Planning Guidance (SPG) (2012) document different accessibility distances for play space dependent upon the age of a child and assesses the play spaces within walking distance. The report also looks at allotments in the area.

For future open space provision, the report uses the targets set in the Open Space and Sports Assessment Update (2011) for the time period up to 2026. Based on this, the study forecasts additional need.

Similarly for all other types of infrastructure assessed, local evidence base was used to assess the baseline provision and generally accepted standards were used to set targets i.e.

- for early years, LBE Childcare Sufficiency Assessment Update (2013) is used;
- for Primary Education, the report is based on The National Travel Survey 2013/14, data collated by the Department for Education's (DfE) Local Authority Cross Border Movement Survey and School Capacity data, LBE's Core Strategy and more recent plans for freeschools or school relocations;
- for secondary education, data used includes The National Travel Survey 2013/14, data collated by the DfE Local Authority Cross Border Movement survey in 2015, and Department of Education School Capacity data and additional data on free schools opening.
- On primary healthcare, data used is provided by the Enfield Clinical Commissioning Groups (CCG) and NHS, Health and Social Care Information Centre and NHS London Healthy Urban Development Unit (HUDU) including CCG patient list sizes compared to number of patients per GP recommended by the Department for Health (DfH).
- On culture and leisure, data and standards originate from LBE Leisure and Culture Strategy (2014), libraries services, The Retail and Town Centre Study (2014) and the LBE Infrastructure Delivery Plan Review 2014.

iii. Does the plan make adequate provision for water infrastructure including wastewater? Would any of the policies compromise the operations of infrastructure providers?

The Council has extensively engaged with Thames Water and the Environment Agency, as the key stakeholders regarding water and waste water infrastructure in the area. Statements of common ground are currently being produced in cooperation between these stakeholders and the Council.

Deephams Sewage Treatment Works, the key facility for waste water processing in the north London area, is located within the ELAAP boundary. A recognition of its importance is enshrined in Policy EL18.

The Council is furthermore suggesting the designation of Deephams STW as Strategic Industrial Land, to give it added protection and to recognise its strategic importance for the area.

The proposed policies would not compromise the operations of infrastructure providers but rather seek to protect, enhance and recognise their importance and contribution to the ELAAP area and beyond.

iv. Does the plan make adequate provision for waste? Is it consistent with local and national policy for waste?

The Council is consulting with the North London Waste Authority and producing a statement of common ground to mutually "recognise that the Development Consent Order (DCO) granted in 2017 for the Edmonton EcoPark". Relevant amendments to the AAP were made through the Schedule of Minor Amendments.

Edmonton Ecopark, one of the most significant waste facilities in London and certainly in North London, is located within the ELAAP boundary. It is located on strategic industrial land and protected through this designation as well as through the London Plan as an existing waste facility.

Additionally, the Council is actively engaging with the surrounding boroughs to produce the North London Waste Plan (NLWP), which safeguards existing waste facilities in the area in line with London Plan and national policies, as well as making necessary provisions to cater for future projected demand for waste processing facilities. A Regulation 19 version of the NLWP will be imminently published for consultation.

ELAAP would not compromise the operations of local waste providers but rather seek to protect, enhance and recognise their importance and contribution to the ELAAP area and beyond.

v. In relation to the Eco-Park, does the policy need to be updated to reflect the DCO? How does it accord with local and national plan policy?

Relevant amendments to the AAP were made through the Schedule of Minor Amendments.

vi. In relation to the Lee Valley Heat Network, is policy EL26 justified? How does it accord with local and national plan policy? Is it too prescriptive? Does the involvement of LBE as a stakeholder in "Energetik" leave the policy unsound?

Plans for the expansion of Ecopark are already enshrined in the DCO and the amendments made through the Schedule of Minor Amendments.

The London Plan and new draft London Plan set heat network priority areas which are relevant to the ELAAP area.

In line with the new draft London Plan policy SI3, ELAAP, as a development plan identifies the need for and a suitable site for necessary energy infrastructure requirements including upgrades to existing infrastructure (e.g. Ecopark) and identifies existing heating and cooling networks (i.e. the Lee Valley Heat Network) and opportunities for expanding existing networks.

The new NPPF also specifically recommends in paragraph 148, that "The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure".

Even more specifically, in paragraph 9.3.7, the NPPF states that "Increasing the amount of new renewable energy sources in London developments is supported. This includes the use of energy from waste schemes that are connected to a heat network".

The detailed wording of the AAP is aimed at giving clear protection and priority to low carbon energy in the ELAAP area, for the benefit of the whole borough and the wider London area.

vii. Would the wording proposed in the relevant Plan policies be an effective means of achieving the aims and objectives of the Plan?

Yes, it is considered that the wording proposed in policies EL5, EL9, EL13, EL27 and E28 would be an effective means of achieving the aims and objectives of the Plan, in particular Objectives 1: Building a Sustainable Urban Neighbourhood, Objective 4; Delivering Sustainable Regeneration and Objective 5; Celebrating the Lee Valley Waterways and Open Spaces.

viii. When looking cumulatively at the scale of obligations and policy requirements, are the sites and the scale of development identified in the Plan viable and deliverable?

The AAP sets a planning policy framework at a high level which would therefore not be appropriate for carrying out detailed viability assessment at this point.

CIL and planning obligations specifically as not set as part of the AAP but are rather relying on existing CIL and Section 106 arrangements, which has been assessed as part of CIL, Core Strategy and Development Management Document adoptions. Both will be reviewed as part of imminent CIL and local plan reviews, which will be fully viability tested, as well as any future specific planning applications.