



EDMONTON LEESIDE AREA ACTION PLAN

EXAMINATION

FINAL

Hearing Position Statement

Matter 9 Implementation

ISSUE: Will the plan be effective?

i. Are the vision and objectives of the Plan realistic and achievable?

The vision seeks by 2032 a thriving community of residents and businesses at Edmonton Leaside. The area will be transformed, in part through improvements in rail infrastructure and in part through sustainable living, working and recreation, supported by a 21st century approach to movement, travel, energy generation and strong business and economic growth. A joined up approach to investment will maximise new homes, jobs and opportunities for the local population.

It is considered that this vision is realistic and achievable; indeed, through Phase 1 of the Meridian Water development, including the first 725 home; a new relocated Meridian Water Station; and rail improvements, implementation is already being advanced. None of the consultation responses received on the submission version of the AAP, even from stakeholders opposing specific provisions in the Plan for various reasons, has questioned the achievability or realism of the AAP vision. This is testament to the way that it has been developed iteratively on the basis of sound local evidence and taken on board feedback from multiple rounds of consultation.

The Council's response in **Matter 1 issue h. evidence base** updates the Inspector on the advances being taken forward by the Council to take control and drive forward the vision for the AAP area through the proactive delivery on Phase 2 of Meridian Water.

The objectives flow from this vision. They are, in turn, 1: Building a Sustainable Urban Neighbourhood, 2 Facilitating Economic Growth, 3. Connectivity, 4. Delivering Sustainable Regeneration and 5. Celebrating the Lee Valley Waterways and Open Spaces. Again, like the Vision, they were developed iteratively on the basis of both technical evidence and consultation input. As such, it is considered that they strike an appropriate balance between aspiration/ambition and realism/deliverability. Again, there have been no indications from any relevant stakeholders that the Plan objectives are not achievable or realistic. As such, it is accurate to state that the AAP has evolved to a point where no stakeholder appears to oppose in principle the idea of progressing

development at Edmonton Leaside as articulated in its vision and objectives. Indeed, the reverse is the case; the Council benefits from a critical mass of supportive stakeholders who, like them, are committed to implementing the vision and objectives of the AAP, thus further demonstrating their achievability and realism.

ii. Does the plan adequately identify constraints to implementation and how does it seek to overcome these?

Yes, the Plan adequately identifies a wide range of constraints to implementation, and in each case identifies clearly measures aimed at overcoming each one. The easiest way to set out each constraint identified across the whole of the area and how the plan seeks to overcome it in each case is in a table as follows:

Plan reference	Constraint to implementation identified	How Plan seeks to overcome constraint
Page 12	Poor north/south and east/west connectivity across and through the area.	New rail infrastructure, a more frequent and comprehensive bus service and network, improving the quality of the pedestrian and cycling environment through a new network of walking and cycling routes, and a transformed road network including a new bridge over the rail mainline, the Causeway as a strategic east-west link and bridge over the River Lee navigation, and greater use of the waterways for transportation
Page 18	Areas of Flood Zones 2 and 3 (medium to high flood risk)	Development proposals to be supported by detailed technical assessment of the flood risks and appropriate mitigation measures, including SuDS; land with potential for offsite flood storage to be identified
Page 39	Viability of affordable housing provision	Housing Zone funding to support developments otherwise constrained by viability; higher density housing development with a positive impact on viability
Page 41	Existing low-density industrial land within Meridian Water restrict scale of housing and employment required for transformational, sustainable growth	More effective configuration of land uses; industrial land at Meridian Water replaced by consolidated, extensive replacement provision to north of North Circular; support given to relocate existing occupiers to appropriate alternative locations
Page 45	Operational requirements of on-site retailers at Meridian Water	Prior to the completion of the full masterplan, access will be maintained for all existing occupiers. Stakeholder engagement is ongoing to ensure that interim needs are met prior to the completion of the full masterplan.
Page 50	Bus depot at Harbet Road	The Council will work with Arriva in finding a suitable alternative location for the bus depot in terms of size and surrounding land uses
Page 53	Ravenside Retail Park has low permeability and acts as a barrier to pedestrian and cycle movement	AAP seeks improvements to access and movement between the Retail Park and its surroundings, in particular for pedestrians and cyclists
Page 60	Not all land required for Causeway in ownership or control of the Council	AAP indicates a Causeway Safeguarded Route; Council will negotiate with landowners along the Safeguarded route; backed up by CPO powers if necessary as a last resort

Page 69	Areas of Green Belt within the Plan area	Opening up Green Belt for recreation and open space in line with national policy; ensuring development proposals at Pickett's Lock are considered in the context of policy for major developed sites in the Green Belt; seeking to direct vast majority of new development into locations not covered by Green Belt restrictions
Page 79	Large-scale infrastructure requirements for new development	AAP recognises that significant upfront investment will be needed to fund infrastructure at the early stages of development, and this will be provided by, among others, Network Rail, LB Enfield, central government (e.g. Housing Zone and HIF funding), the GLA, TfL, Lee Valley Regional Park Authority, Canal & River Trust, and the Environment Agency. Otherwise, infrastructure to be funded and delivered through Enfield CIL, Mayoral CIL and section 106 agreements.
Page 95	Angel Road Retail Park is isolated and losing its retail character	Angel Road Retail Park to be de-designated and promoted instead as a mixed employment-led location, catering for small businesses and ancillary uses; policy 'works with grain' of market activity rather than resisting it
Page 135	Energy requirements for new development	Further development of the Lee Valley Heat Network (LVHN), a decentralised energy network that can meet the energy needs of both existing and new development; Council will use CPO powers if necessary as a last resort to ensure delivery of LVHN
Page 150	Risk of a piecemeal approach to development, with individual landowners bringing forward discrete plots	The AAP requires a comprehensive approach to masterplanning of the area, with partnership working between the private sector (including investors and developers) and a lead role for Enfield Council as the key public sector body leading regeneration. Piecemeal applications which are not consistent with an acceptable masterplan for the entire Meridian Water area will be refused.
Page 152	Land in some key parts of the site, including Meridian Water, is fragmented between several owners	The Council has acquired land in key locations across Meridian Water by negotiating with landowners, enabling the Council to deliver and coordinate investment and development in an effective way. The Council has made an in-principle resolution to use CPO powers if necessary in the implementation of this goal.
Page 160	Comprehensive approach to development, implementation, monitoring, phasing and delivery needed over the whole plan period	The AAP advises the Council to set up an Edmonton Leaside Area Action Plan Officer Working Group to monitor and drive forward delivery of proposals. The project group would be an officer advisory/ implementation group with a project sponsor from senior management and made up of senior representatives from relevant service areas, working in partnership with a wide range of plan area stakeholders, landowners and developers as appropriate, both public and private. The Council will, whether in the form of the Working Group or otherwise, take a lead role in the masterplanning of Meridian Water.

iii. Does the plan adequately respond to the needs and aspirations of existing landowners and operators?

Yes, the Plan as a strategic high level planning document adequately responds to the needs and aspirations of existing landowners and operators. In general terms, this has been achieved through the extensive process of policy development and consultation detailed in our answer to i) above.

A more detailed description of the Plan's response to the needs of existing landowners and operators is set out below by sector and/or location within the Plan area

a) Retail landowners and operators

Meridian Water

The Plan response to the needs of existing retail operators at Meridian Park is set out in more detail in our response to Retail Matters. In general terms, the Plan has had careful regard to the operational needs and requirements of Tesco, Ikea and Ravenside Retail Park, continued operation of which are all explicitly supported by the Plan.

The Plan strikes an appropriate balance between the need for comprehensive regeneration of the strategic opportunity at Meridian Water and the need to ensure that the impact of that regeneration on existing retail business is minimised. The success of the Plan's approach in this regard is indicated by the fact that neither Tesco nor operators at Ravenside Retail Park have stated any in-principle objections to development in their Regulation 19 submissions.

While it is true that IKEA's submission does indicate a greater degree of concern, this is recognised by the Council, who also acknowledge the challenges faced with existing operators and bringing forward comprehensive redevelopment over a 20 year build programme. Dialogue continues with IKEA over any minor modifications through the drafting of a Statement of Common Ground that could provide additional reassurance to the store.

Angel Road Retail Park

The Plan seeks to introduce a greater range of uses, specifically employment-led mixed use to Angel Road Retail Park. No objections to this aim were stated by existing retail operators in this location at Regulation 19 stage. In any case, the policy seeks to formalise and regulate a process which has already started, meaning, in general terms, the Plan approach is to go with the grain of developer and landowner aspirations for the area.

b) Industrial/business landowners and operators at Meridian Water

The Plan's approach to industrial/business land at Meridian Water (i.e. at Harbet Road) is one of comprehensive redevelopment. Existing landowners/operators will be relocated as appropriate. The specific approach to relocation is set out clearly for the benefit of relevant stakeholders in Plan paragraph 6.5.19 and Part D of Policy EL15.

Unsurprisingly, the approach of comprehensive development and relocation of existing industrial businesses at Meridian Water is not the preferred option for some of those landowners/businesses, and this has been made clear in representations to the Council.

However, the Council's approach is considered justified, fair, reasonable and proportionate in the circumstances. Local authorities regularly adopt planning policies and/or resolve to develop land

against the wishes of the operator or landowner where it can be demonstrated that there is a compelling public interest for redevelopment. The Council considers that such a compelling public interest applies in this case, as set out variously through the AAP and across answers for all Matters.

This is why the Council states in paragraph 14.2.7 that its preferred initial approach is one of negotiation with individual landowners and operators. However, the AAP is also clear that a new comprehensive Masterplan will be progressed for Meridian Water, and that proposals will be assessed in terms of their conformity with that Masterplan to avoid the alternative approach of piecemeal development.

c) Industrial landowners and operators at Montagu Industrial Estate, Claverings Industrial Estate, Eleys Industrial Estate and Aztec 406

The approach to these locations is detailed in Policy EL15: Improving Existing Industrial Areas.

Enfield Council owns both the Montagu and Claverings Industrial Estate. Both estates will be (as per AAP paragraphs 6.5.11-6.5.13 and 6.5.15-6.5.18) regenerated through partnership working between the Council and relevant parties, in the case of Montagu through a joint venture with a developer is being progressed. The intention is to achieve overall environmental benefits from the regeneration of the estate. No objection to this approach, which is considered adequately to respond to the needs and aspirations of the existing landowner and operators, has been received from operators at either location.

Eleys Industrial Estate is in multiple, fragmented ownership, with approximately 72 different landowners (AAP paragraph 6.5.8). Paragraphs 6.5.9 state that the Estate is affected by a number of issues, predominantly around congestion, parking, areas of poor estate environment, and crime, and that as such the Council will work with representatives of the Eley Estate management group to better understand the issues affecting the estate. This approach, developed on the basis of consultation with relevant parties, is considered an adequate response to the needs and aspirations of the existing landowners and operators and no objections to it have been received.

The AAP proposes no significant changes to the Aztec 406 estate other than the provisions of Policy EL15. Again, this is considered an adequate response to the needs and aspirations of existing landowners as the Council understands them.

d) Edmonton EcoPark

The AAP seeks redevelopment of the EcoPark site through Policy EL17, which is considered an adequate response to the needs and aspirations of its landowner (NLWA- North London Waste Authority) in the context of the policy requirements set out in paragraphs 8.1.2 to 8.1.4, including those of the Mayor of London and the EcoPark SPD (2013).

In its submission to the Regulation 19 AAP, NWLA stated that their only key concern with the Plan was that it needed to reference as appropriate the recently-granted Development Consent Order for the Park, (this is already referenced as forthcoming in Table 14.1, but the Council proposes to update the AAP text as appropriate). No other objection was stated and as such it is considered that, subject to this and a few other relatively minor changes requested, the Plan comprises an adequate response to NWLA's needs and aspirations.

e) Deephams Sewage Treatment Works

Deephams Sewage Treatment Works is owned and operated by Thames Water, which has recently completed a significant upgrade. The AAP welcomes and supports this upgrade (paragraph 9.1.4)

and seeks to protect Deephams' continued operation further through designating it as SIL in line with adopted and emerging London Plan policy (see also the Council's answer to question v of Matter 2: Employment). Policy EL18 implicitly seeks the continued operation and success of Deephams.

In its Regulation 19 submission, Thames Water objected to the designation of Deephams as SIL but stated no other major objections to the AAP.

f) Picketts' Lock/Lee Valley Regional Park

Vibrant Partnerships and Lee Valley Regional Park (LVRP) represent or comprise respectively the key businesses and landowners at Picketts Lock. In their Regulation 19 submissions, which share common text, both offer strong in-principle support to the regeneration of Picketts' Lock. Both stakeholders seek for the AAP to relax Green Belt constraints to varying extents; however, the LVRP recognises, correctly, in its submission that the designation of Picketts Lock as a Major Developed site in the Green Belt will remain until the Council completes its review of Green Belt boundaries in time for the new draft Local Plan.

Both stakeholders also seek relocation of Ponders End station further south, which would improve accessibility to Picketts Lock and be considered as part of an overall package of Crossrail 2 measures.

While noting the concerns of both stakeholders in terms of Green Belt and rail accessibility, neither stakeholder sets out in detail where they consider that local land is not fulfilling the five functions of Green Belt land in line with national policy; it is assumed, however, that they will do so through the forthcoming Local Plan preparation. Additionally, the Council does not consider that compelling evidence, either in terms of technical requirements or in consultation responses, has ever been presented to indicate that the aspirations or aims of the AAP could be met only through amendment of Green Belt boundaries locally.

Crossrail 2 is not yet committed and, as such, while noting and welcoming the positive effects that it would have on the AAP area, the Council has taken the approach of deliberately de-linking AAP progression from its delivery. As such, it would not be appropriate at present for the AAP to provide for station relocation as part of Crossrail 2; rather, as with Green Belt, this case can be made through preparation of the forthcoming Local Plan.

While seeking some minor amendments in terms of the AAP's approach to the Regional Park as a whole, the LVRP submission states no in-principle objection to the neighbouring development proposed by the AAP.

For these reasons, the Council considers that the Plan as drafted comprises an adequate response to the needs and aspirations of both stakeholders within the context of the constraints applying to the Plan area.

g) Transport operators/landowners

In line with its Vision and its Objective 3: Connectivity, the AAP is careful throughout to consider the various needs and aspirations of transport operators and landowners. These include Network Rail, train operating companies, Transport for London (TfL), Highways England, Arriva and the Canal & River Trust (CRT). Neither Network Rail nor the train operating companies object to the AAP; indeed, many of the key elements of the AAP relevant to rail operations are already being implemented, i.e. the relocation and renaming of Angel Road station to Meridian Water (see, for example, paragraph 14.3.3, which notes Network Rail's pre-existing commitment in this regard).

TfL provided detailed comments at Regulation 19 stage, which stated that they support the objectives of the Area Action Plan, and no significant/major objections were made. In respect of the proposed relocation of the existing Towpath Road bus depot as part of the comprehensive development of Meridian Water, TfL states that it will advise the Mayor on whether the alternative site sought (see AAP paragraph 5.4.19) is suitable and secured for use as a bus depot before agreeing to loss of the existing depot; it notes the potential for indicating the location of a new bus depot in any forthcoming Masterplan.

Arriva operates the bus depot which the AAP proposes to relocate. In their Regulation 19 submission, it states that there is no difference between the TfL position (outlined above) and that of Arriva. Statements of Common Ground with both parties are being progressed and likely put forward minor modifications to the Plan to overcome any outstanding issues.

In its Regulation 19 submission, the CRT offers strong support for the AAP, albeit seeking minor changes to wording and policy throughout.

On the basis of these responses, the Council considers that the Plan as drafted comprises an adequate response to the needs and aspirations of the full range of transport operators, owners and landowners across the Plan area.

iv. Does the plan provide for a realistic timescale for development? Does it identify appropriate phasing for development through the plan period and beyond? Does it preclude earlier development of some sites?

The Plan period extends to 2032, meaning at the time of writing it covers a fourteen-year period into the future. In terms of the type and quantum of development proposed, it is considered that this is a highly realistic timescale for development.

It is also considered that the plan identifies appropriate phasing for development through the plan period and beyond to the extent necessary at this stage/level of planning. The section of the plan that is most relevant for the purposes of this question is Part D: Delivery and Implementation.

Part D sets out a high-level development phasing and delivery strategy for Meridian Water appropriate at the level of the AAP. It does so by designating eight indicative design and delivery zones. As noted by paragraph 14.4.5, these zones comprise a flexible framework for phasing, enabling phases of development to come forward in parallel with the infrastructure investment required.

The AAP recognises that, in practice, development partner phasing may cause the zones to deviate slightly from its Figure 14.1. However, each zone has been defined to support the critical mass and mix of uses necessary to ensure significant place-making. Additionally, paragraph 14.4.6 recognises that precise details of phasing will be dependent on a number of factors including improvements to public transport accessibility and improvements to the highways network.

Paragraphs 14.4.7 and 14.4.8 note the potential for temporary and meanwhile uses across the area, having regard to the length of the phasing period.

The Council's answers on other Matters have highlighted the evidenced need for the AAP to be flexible, and the issue of phasing and delivery is no different. It is more appropriate for specific details of phasing and delivery periods, in terms of the order and precise lengths of development phases, to be provided at a more site-specific level, including within the forthcoming Meridian Water masterplan, and then reflected in the planning permissions that will be submitted in line with it.

Otherwise, landowners and developers would argue, correctly in the view of the Council, that the AAP is too inflexible; rather it should, and does, comprise a high-level policy framework aimed at guiding rather than prescribing the details of development, setting the stage for that level of detail at a later, more site-specific stage.

The AAP sets out a comprehensive list of priority AAP projects in Table 14.1. The intention of this list is to provide further guidance and certainty to those progressing the Meridian Water masterplan, as well as to other key stakeholders across the rest of the AAP area, which projects are considered from the perspective of the Council the most important in terms of delivering and implementing the AAP.

In this context, it is considered that the AAP identifies appropriate phasing for development throughout the plan period and beyond to the extent that it is appropriate to do so; it offers certainty and commitment on the part of the Council while at the same time seeking not to pre-empt or constrain the appropriate phasing or detail of any future masterplan or planning applications.

Given the deliberate flexibility offered by the AAP in terms of phasing and delivery, it is therefore not considered that it precludes the earlier development of sites where developers can demonstrate a compelling reason to do so.

On the contrary, it seeks to encourage the early development of Meridian Water by setting out in detail (paragraphs 14.4.2 to 14.4.4) that permission has already been granted for Phase 1.

Additionally, a further mechanism aimed at facilitating rather than precluding earlier development appears in Table 14.1, which notes dependencies applying to projects where to do so increases delivery and implementation certainty. For example, it states that:

- a road network across Meridian Water will be required early in development phasing;
- decontamination of previously industrial sites is required before they can be considered suitable for alternative land uses;
- flood compensation and enabling works must be in place ahead of development in any flood zone;
- Leaside Road bridge over Pymmes Brook will unlock the development of zones 4-8; and
- Pylons will enable the provision of electricity for the development of zones 6-8.

v. Are there any omissions in the projects identified that would compromise soundness? Have any other projects been considered and discounted?

The Edmonton Leaside Area Action Plan has developed incrementally over many years, with the ideas and policies it promotes having been subject to multiple rounds of consultation and refinement (see paragraphs 3.14 to 3.19). Though it is never possible to state definitively that there have been no omissions in any Plan of this scale and ambition, the purpose of the Plan's lengthy development and consultation phase was precisely to minimise the risk that it omitted any projects and to minimise the risk that such omissions would compromise the Plan's soundness.

Since work began in the late 2000s, the submission AAP has gradually evolved, and as will be clear from a review of earlier iterations on the Enfield website (and as set out in paragraph 3.13), it is not so much the case that other projects have been considered and discounted, more that the projects in the submission AAP have evolved in detail and complexity over time from the original set of high-level ideas for the area's future. However, the general principles underpinning the development of the AAP and that are reflected in its vision and objectives- that Edmonton Leaside has potential for strategic-scale regeneration, including thousands of new homes and jobs at Meridian Water,

balanced by a range of environmental and other interventions to improve quality of place across the rest of the AAP area- have never changed.