



## EDMONTON LEESIDE AREA ACTION PLAN

### EXAMINATION

#### FINAL

### Hearing Position Statement

#### Matter 5: Climate Change, Biodiversity and Environmental Protection

Issue: Whether the policies in the Plan are consistent with the aim of the Framework, to mitigate and adapt to the effects of climate change?

**i. Is the 2013 Strategic Flood Risk Assessment (SFRA) and the recommendations within it a sound basis on which to base the comprehensive redevelopment of the site?**

The plan recognises the need to provide flood risk assessment for subsequent proposals. AAP Policies EL8 on Managing Flood Risk in Meridian Water and Policy EL28 on new and existing green spaces specifically address the matter of flood risk, in line with Core Strategy policies 28 and 29, London Plan Policy 5.12 and new draft London Plan Policy SI12. Enfield council also acknowledges the changes in Environment Agency Flood Risk Allowances.

A statement of common ground is being drawn up between the council and the Environment Agency to recognise that both parties agree that assessing and managing flood risk is critical to the development of Meridian Water. Although Meridian Water lies within Flood Zones 2 and 3 it is identified by the Core Strategy (2010) as a location for development due to the borough's wider sustainability objectives. The Level 2 Strategic Flood Risk Assessment (2013) that was carried out for this site concluded that it is feasible to make the development safe without increasing flood risk elsewhere. Policy EL8 requires all developments to carry out a site specific Flood Risk Assessment (FRA) to be submitted with each planning application.

Both parties also agree that restoration of watercourses can mitigate flood risk and that this is referenced in paragraph 5.9.8.

A further statement of common ground is being drawn up between the council and Thames Water to mutually recognise the importance of managing flood risk at Meridian Water and within the wider Edmonton Leaside area. Following the Environment Agency's requirement to meet new climate change allowances, and the increased level of development at Meridian Water, the assessment of flood risk at Meridian Water has moved beyond the SFRA Level 2 prepared in 2013. Text changes have been made to the AAP to address this matter.

**ii. The Level 2 SFRA recommendation in 4.67 states "that the Sequential Test is to be applied within the site, steering development towards areas of low flood risk but where this is not**

**possible, in making their allocations, the Council will need to be satisfied that the Exception Test can be passed” Is this approach realistic or appropriate for Meridian Water, given the high densities proposed ?**

The SFRA Level 1 undertaken showed need for development at Meridian Water, as established in the Core Strategy. The Sequential Test approach is in accordance with NPPF paragraph 155-165. Enfield Council accepts that the previously undertaken SFRA Level 2 is now in need of being renewed, in line with new Flood Risk Allowances.

However, this AAP only provides the overarching policy framework for regeneration at Edmonton Leaside. Specific testing and solutions to assess and address flood risk are more appropriate to be brought forward for individual proposals and planning applications, and as part of the forthcoming Meridian Water masterplan. Densities proposed will be taken into account but are not considered an impediment in themselves.

On a scheme wide basis the infrastructure work tackles flood risk on a comprehensive level for the entire Meridian Water site, including proposed major ground works in the lee valley regional park and the central part of the site to create flood storage capacity. Thereafter, for subsequent development, additional flood risk mitigation will be undertaken as required this will be captured in the forthcoming Masterplan.

**iii. How does this approach accord with guidance in the Framework, para 104 of Framework?**

Paragraph 104 of the previous National Planning Policy Framework has since been updated. The new relevant paragraph 162 now reads as follows:

Where planning applications come forward on sites allocated in the development plan through the sequential test, applicants need not apply the sequential test again. However, the exception test may need to be reapplied if relevant aspects of the proposal had not been considered when the test was applied at the plan-making stage, or if more recent information about existing or potential flood risk should be taken into account.

The sequential test was carried out by the SFRA Level 2 carried out for the Enfield Core Strategy.

The Exception Test can be carried out as part of future planning applications and as part of the forthcoming Meridian Water Masterplan (see above).

**iv. How does the Plan strategy in relation to flood risk reflect cumulative flood risk and the aim of reducing flood risk?**

Policy EL8 and its supporting text establishes ELAAP’s approach to managing flood risk within Meridian Water, in line with Core Strategy Policies 28 and 29.

As the area is already previously developed land with extensive flood risk, comprehensive redevelopment at a higher standard provides a significant opportunity for reducing flood risk by improving flood risk management, for example through the application of the SuDS Management Train prior to discharge surface water runoff.

The previously undertaken Level 2 Strategic Flood Risk Assessment summarises flood risk at Meridian Water in its totality. As development progresses, cumulative flood risk is taken into account in successive flood risk assessments undertaken for the upcoming Masterplan and individual planning applications (see above). The over-arching flood risk management strategy for Meridian Water will be set out in the upcoming Masterplan.

**v. Does the plan make realistic assumptions about upstream and downstream flood storage?**

Upstream and downstream flood storage are potential parts of a comprehensive flood risk management strategy for Meridian Water. However, the application of this as a potential solution will require detailed assessment which will be more appropriately undertaken to support the more detailed plans of the Masterplan. At this stage plans will be sufficiently detailed to allow realistic negotiations with land owners.

The flood risk management strategy being developed for Meridian Water demonstrates that flood risk can be managed on site and therefore additional offsite storage will not be required.

ELAAP sets the strategic planning policy framework to allow for such plans to be taken forward by the upcoming Masterplan and as part of subsequent planning applications. Policy EL8 also allows for seeking of planning obligations for subsequent development where there is a risk of flooding and where flood mitigation infrastructure is required, in line with Enfield's Core Strategy and Section 106 SPD.

**vi. Is there a timescale for the provision of flood storage?**

Timing as well as the level and location of demand for the provision of flood storage will be driven by subsequent development timetables and therefore assessed as part of the upcoming Meridian Water Masterplan and subsequent planning applications.

**vii. Is it necessary for the Plan to make specific provision for flood risk infrastructure and surface water drainage?**

The plan sets the general planning policy framework for requiring flood risk infrastructure and surface water drainage as necessary. The council agrees that any specific flood risk infrastructure requirements must be agreed with Environment Agency. The council has consulted the Environment Agency on ELAAP and has drafted a relevant statement of common ground.

Both parties agree that assessing and managing flood risk is critical to the development of Meridian Water. Although Meridian Water lies within Flood Zones 2 and 3 it is identified by the Core Strategy (2010) as a location for development due to the borough's wider sustainability objectives. The Level 2 Strategic Flood Risk Assessment (2013) that was carried out for this site concluded that it is feasible to make the development safe without increasing flood risk elsewhere. Policy EL8 requires all developments to carry out a site specific Flood Risk Assessment (FRA) to be submitted with each planning application.

The Environment Agency also has its own overarching plans for flood risk management infrastructure improvements in the Lee Valley which are still evolving. The Council is committed to continue working with the Environment Agency on improving flood risk infrastructure in the area.

More specific plans for surface water drainage must respond to individual development details and be integrated in and connected with the landscaping and design of each development, as per policy EL8. This is therefore better addressed as part of the upcoming Meridian Water Masterplan and subsequent planning applications.

**viii. Is it necessary for the Plan to make specific provision to address issues relating to land contamination within the plan area, including the potential effects of development in Source Protection Zones (SPZs)?**

It is not considered necessary to make specific reference as any forthcoming planning application on contaminated land would already require a preliminary risk assessment.

The ELAAP policy and implementation schedule recognise remediation as a necessary part of the comprehensive redevelopment of a previously developed area. This is in line with Core Strategy Policy 32 and associated DMD Policies.

The statement of common ground being prepared jointly by Enfield Council and the Environment Agency also mutually recognises contaminated land at Meridian Water posing a potential threat to groundwater and sets out that there is an existing requirement for planning applications on contaminated land to undertake a preliminary risk assessment and it is not necessary to provide further reference in the ELAAP.

The Core Strategy, DMD and ELAAP set the overarching policy framework, however more specific provision to address issues relating to land contamination within the plan area, including the potential effects of development in Source Protection Zones (SPZs) will be addressed through the upcoming Meridian Water Masterplan and subsequent planning applications.

For example, Meridian Water Masterplan team has already undertaken both soil and groundwater remediation on the Willoughby Lane site and this will be completed to residential standards by early 2019.

Also, as part of the HIF infrastructure funding bid currently being undertaken by Enfield, this would include remediation of all the land in central section of Meridian Water plus the road corridors across the site. As part of the masterplan, the council will detail the remediation plans for the rest of the site.

**ix. Is it necessary for the Plan to make specific provision for flood risk infrastructure and surface water drainage?**

See response to question (vii) above.

**x. How will the plan respond to the operational needs of Thames Water?**

A Statement of Common Ground is being prepared jointly by the Council and Thames Water. This agrees to a number of wording changes relating to the reservoirs, to Deephams STW and other land owned by Thames Water, to reassure Thames Water of the council's recognition of Thames Water's operational requirements and the council's commitment to not undermining these through ELAAP.

The statement of common ground mutually recognises that the Deephams site will continue in ongoing use as an operational sewage treatment works, that the land to the north of the North Circular and south of William Girling Reservoir, and land to the south of the North Circular, including land owned by Thames Water, is not publicly accessible and should not be referenced as '*open space*', or variations on this label, that the structural integrity of the reservoirs and health and safety issues must be fully recognised and that any proposals on land south of William Girling Reservoir and land to the south of the North Circular Road at Harbet Road must involve working with the landowners, including Thames Water.

The designation of Deephams STW as Strategic Industrial location is now acceptable to Thames Water and in line with the London Plan. The purpose of the designation is to recognise the STW's strategic importance for Enfield and the wider north London area, and to add a level of safeguarding to the land to protect this function.

**xi. With regard to the potential for disturbance impact to the Walthamstow Reservoirs SSSI/ Lee Valley SPA/Ramney site, does the Plan take an acceptable approach to mitigating any likely significant effects?**

The Council has agreed a Statement of Common Ground with Natural England which addresses concerns relating to disturbance and impact.

Both parties recognise that development must not negatively impact on areas of ecological importance and will include additional wording to that effect.

The statement of common ground particularly recognises that development must not negatively impact on areas of ecological importance, particularly through recreational disturbance, and will include additional wording for Policy EL9 through adding a new item on the subject of avoiding negative impacts such as recreational disturbance on sites of ecological importance, including the Chingford Reservoirs SSSI and Lee Valley Special Protection Area/ Ramsar site at Walthamstow Reservoirs.

**xii. Does the Plan make appropriate provision for ecological enhancements along river corridors and throughout the Plan area?**

The AAP Objective 5 sets out within Edmonton Leaside to 'create a linked network of blue and green spaces which improve green infrastructure and habitats', establishing a clear AAP direction to provide ecological enhancements.

Protecting, reconnecting and improving habitat along the watercourses is provided for through numerous policies in ELAAP including Policy EL9, EL12, EL20, EL27 and EL28.

The AAP's significant, appropriate provision for ecological enhancements along river corridors and throughout the Plan area is also demonstrated and recognised through the statements of common ground agreed with the Lee Valley Regional Park, Natural England and Canal & River Trust.

**xiii. How does the Plan balance the aims of regeneration with those of enhancing biodiversity throughout the Plan area?**

This is set out both in ELAAP's Objectives and policies (as per above on matter xii). The broader policy framework for this is set out in the Core Strategy (including strategic objective 2 and policies 29 and 36; additionally policy 46 sets this out as a provision which is suitable to be funded and/or implanted through planning obligations) and associated DMD policies as well as the London Plan including draft London Plan policy G6.

More detailed plans for enhancing biodiversity as well as the quality of and access to local environment are set out in the upcoming Meridian Water Masterplan and subsequent planning applications, in line with more detailed plans being developed.

The council believes that the comprehensive redevelopment of an area which is rich in biodiversity resources but which in the past has lacked both quality, positive management and access to said resources, poses a significant opportunity to make improvements.

**xiv. 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 EL8, EL9, EL12, EL20, EL27 and EL28 would be an effective means of achieving the aims and objectives of the Plan, in particular Objective 1 on Building a Sustainable Urban Neighbourhood, Objective 3 on Connectivity, Objective 4 on Delivering Sustainable Regeneration and Objective 5 on Celebrating the Lee Valley Waterways and Open Spaces.

The AAP's significant, appropriate provision for the local environmental is also demonstrated and recognised through the statements of common ground agreed with the Lee Valley Regional Park, Natural England, Canal & River Trust, Thames Water and the Environment Agency.