

LEE VALLEY REGIONAL PARK AUTHORITY

**REGENERATION AND PLANNING
COMMITTEE**

31 JULY 2025 AT 12:00

Agenda Item No:

5

Report No:

RP/96/25

PLANNING CONSULTATION BY ENFIELD COUNCIL

**PLANNING APPLICATION FOR REDEVELOPMENT OF EXISTING GOLF
COURSE AND CONSTRUCTION OF A SURFING COMPLEX COMPRISING:**

(1) OUTDOOR SURF LAKE (USE CLASS F2); (2) TWO-STOREY CLUBHOUSE INCLUDING TERRACES, WITH CAFE, SURF SHOP, HEALTH AND WELL-BEING FACILITIES, CHANGING FACILITIES, OFFICES (USE CLASS E), SURFING OPERATIONS AND SOLAR PANELS; (3) EXTERNAL PLANT, MACHINE AND STORE ROOMS STRUCTURES FOR SURF GENERATION (SUI GENERIS); (4) RENEWAL AND ALTERATION OF EXISTING CAMPSITE AND THE PROVISION OF ADDITIONAL ACCOMMODATION AND ANCILLARY BUILDINGS (SUI GENERIS) WITH COMMUNAL SPACE; (5) USE OF LAND FOR POP UP TEMPORARY OUTDOOR EVENTS, WITH ASSOCIATED TEMPORARY STRUCTURES; (6) FREE STANDING SHELTER WITH VIEWING DECK; (7) ENGINEERING WORKS INCLUDING MOUNDING AND BUNDS; (8) PUBLIC PARK, VIEW POINT STRUCTURE, PAVILION AND EXTERNAL PLAY AREAS; (9) POP UP SEASONAL STRUCTURES; (10) LEISURE FACILITIES INVOLVING A PUMP TRACK, SKATE BOWL, SPORTS COURTS, SKATE ROUTES AND EXTERNAL PLAY AREAS; AND (11) ASSOCIATED SOFT AND HARD LANDSCAPING, BOUNDARIES, LIGHTING, FLOOD LIGHTING, PARKING AND ACCESS ROUTES.

**AT: LEE VALLEY GOLF COURSE AND CAMPING & CARAVAN PARK, 61
MERIDIAN WAY, EDMONTON, LONDON, N9 0AR**

Presented by Head of Planning

SUMMARY

The application site is located within the Regional Park at the Lee Valley Leisure Complex and forms part of the Green Belt within Enfield. The application proposes a major new leisure development on the site of the Lee Valley Golf Course and Camping and Caravan Site for the creation of an inland surf lake, clubhouse and accommodation offer with a range of complementary recreational and sporting uses. These would cater to a wide range of leisure interests and abilities both locally and from across the region. The proposal is in accordance with the Authority's Park Development Framework (PDF) Proposals under 4.A.4 which seek to develop Pickett's Lock as a strategic leisure destination and will deliver new areas of

recreational open space and biodiversity.

There are some concerns over a lack of detail in certain areas but it is felt these matters can be dealt with via planning conditions should Enfield Council be minded to grant consent and that as a whole the proposal should be supported.

RECOMMENDATIONS

Members Approve:

- (1) that Enfield Council be informed that the Authority has no objection to the above application providing that the following conditions are attached to any grant of consent to secure:
 - (a) provision of a detailed Ecological Landscape Planting and Management Plan to ensure the proposed landform, viewing platform, planting and habitat creation can be delivered, including the 3 to 1 replacement strategy for trees and use of a native planting palette, and that the planting and habitat is protected and maintained over time;
 - (b) provision of a Management and Maintenance Plan for the Community Park, Canal Park and Enfield Ditch Reserve to include the associated green infrastructure, access, landscape care, ecological monitoring and Sustainable Drainage Systems (SuDS) upkeep.
 - (c) the delivery of the mitigation measures as identified in the Ecology Report, including the provision of a Construction Environmental Management Plan to safeguard any protected species during the clearance of vegetation and habitat creation works;
 - (d) the delivery of a sensitive lighting strategy for the site as set out in the lighting plan and with reference to the 'Institute of Lighting Professionals (2023) Bats and Artificial Lighting at Night Guidance Note 08/23' to ensure light spill is minimised;
 - (e) provision of detailed planting and hydrological scheme for the Enfield Ditch Reserve together with an ecological strategy, implementation phasing and details of public access restrictions to ensure a wildlife reserve can be achieved and to ensure full SUDS performance;

- (f) a Biodiversity Net Gain (BNG) Plan and associated Habitat Management and Monitoring Plan (HMMP);
 - (g) additional transport surveys to ensure account has been taken of key busy times when multiple events are taking place across the Lee Valley Leisure Complex (LVLC) as a whole and to ensure any mitigation or improvements required to the internal access routes and Meridian Way/LVLC junction are provided for consideration before the commencement of development;
 - (h) provision of an Operational and Events Management Strategy and activation plan to ensure overarching principles are in place to guide the management of safe and inclusive sporting and community events on the application site, and any noise mitigation, in association with events within the wider LVLC. This should cover the specifics of the new Terrorism (Protection of Premises) Act 2025, security and emergency access requirements and ensure these integrate with the wider LVLC, both during construction and operational phases;
 - (i) Provision of further detail for the boundary treatment, its specification and installation design both external and internally between the different areas and in particular for the for the Enfield Ditch Reserve; and that
 - (j) appropriate S106 contributions for the Pickett's Lock bus interchange improvements and for pedestrian and cycle access improvements along Meridian Water towards Ponders End Station; and
- (2) that Enfield Council be informed that the Authority would wish to be consulted on the above matters in due course.

BACKGROUND AND SITE CONTEXT

- 1 The application site is located within the Regional Park and the Green Belt. It forms part of the Lee Valley Leisure Complex at Pickett's Lock. Covering an area of approximately 22.8 ha and broadly rectangular in shape it consists of land currently used as part of Lee Valley Golf Course – (the site extends across 9 of the 18-hole course) and includes the Lee Valley Camping and Caravan Park. The camping site comprises 131 pitches together with toilet and shower facilities, a reception and shop within several wooden lodges and a small playground.

- 2 To the east lies the William Girling Reservoir designated a Site of Special Scientific Interest (SSSI) and the River Lee Navigation, the towpath of which runs adjacent to the Reservoir boundary. The Lee Valley Athletics Centre lies immediately to the west, together with the Ark Royal Wedding Venue, and 12 screen Odeon Luxe Cinema. To the north lies the rest or other half of the golf course and Ponders End Lake designated as a Site of Metropolitan Importance for Nature Conservation (SMINC). This land is shown within the 'blue line' on the site plan but does not form part of the application site. Please refer to the location and context plans at Appendix A.
- 3 Further to the north beyond the Pickett's Lock site is the Meridian Business Park, comprised of industrial and storage distribution uses. To the south is Pickett's Lock Lane and several short rows of terraced houses. Beyond this lies the Thames Water Deephams Sewage Treatment Works.
- 4 Meridian Way the A1055 runs north south alongside the western boundary of Lee Valley Leisure Complex providing access to the Pickett's Lock site. It connects with the A110 in the north and the North Circular A406 to the south. The Leisure Complex is also served by the W8 bus route, a regular service that connects the Leisure Complex with Edmonton Green station (and bus station, a 10-minute journey time) as well as Enfield Town, Chingford, and surrounding areas. The bus stop/shelter is located in front of the Odeon Cinema – the terminating point for the W8. Ponders End railway station is located approx. 1.3km to the northwest of the site (18min walk or 6min cycle ride) with Meridian Water 2.3km to the southwest (9min cycle ride but a 49min walk). Both offer services on the West Anglia Main Line, providing access to Stratford, Tottenham Hale, and Liverpool Street.
- 5 The application site is only accessible to golf users and the northern portion to those staying at the camping and caravan site. The public can access the venues and facilities within the wider LVLC, but there are no public rights of way. The LVLC is served by a large car park providing nearly 1000 spaces, to cater for the venues including the Lee Valley Athletics Centre and associated events use. The National Cycle Network (NCN) Route 1 runs along the River Lee Navigation towpath but does not connect directly into the application site or the wider LVLC.
- 6 The Environment Agency mapping shows the site to be predominantly in fluvial Flood Zone 1 (Low Risk), although in the southeast corner, there is an area of the site which falls within Flood Zone 2 (Medium Risk), classified as "land with a probability of flooding between 1% and 0.1% from rivers and 0.5% and 0.1% from sea". This Flood Zone 2 area appears to be associated with the Enfield Ditch watercourse in this area of the site.
- 7 The application site presents as a largely open and flat area of grassland punctuated by earth bunds and mounding associated with the golf course. There is an established tree canopy across large parts of the site including the campsite with several mature trees and tree belts particularly along the site's boundaries. The existing vegetation and habitats; the grassland, woodland, scrub, and adjacent open water and wetland margins contribute to the ecological value and connectivity of the Regional Park and offer buffer habitats for the adjacent SSSI.

8 **Community Engagement**

The applicant has undertaken three hybrid virtual and in person consultation events, most recently in July 2025. These include in-person events held both at the Edmonton Green Shopping Centre and the LVLC. Letters have also been delivered to local residents and businesses around the site with information about the event and proposals and social media adverts have provided details and links to the dedicated consultation page on The Wave's main website where feedback is encouraged.

Consultation and discussions have been held with the Authority and more recently there have been meetings with the other tenants based at the LVLC.

9 **Future Lease Arrangements with the LVRPA**

The Authority owns the freehold of the application site. In 2017, the Authority marketed part of the Lee Valley Leisure Complex, the Lee Valley Golf Course and Camping and Caravan Site for future development. The Wave Group was subsequently selected as the successful party with a proposal to build an inland surfing lake, associated club house and ancillary leisure facilities. Any future leisure operation will be subject to planning and will require the Wave Group (Wave London) to enter into a lease with the Authority. The details of this would be discussed and approved by the Executive Committee and does not then need to be considered by this Committee or detailed in this report.

DESCRIPTION OF THE APPLICATION PROPOSALS

10 The main components of the proposed development are as follows:

- creation of a **surf lake** and associated operational infrastructure;
- a **'clubhouse' building** (approx. 2,500sqm);
- 150 space **car park** and drop off area;
- renewal of the existing **camping accommodation**;
- a **Community Park** with space for seasonal events, informal sport and nature-based play;
- an **Activity Park** consisting of pump tracks, sports courts, skate areas and play spaces; and
- the **Canal Park and Enfield Ditch Reserve** – the southern part of this area to be a preserved area of habitat restoration with only limited access for research and education.

Please refer to Appendix B for the layout of the various components.

It should be noted that the Surf Lake, and its immediate lakeside areas will be behind a paywall together with the Activity Park. The Community Park will be a public space outside the paywall together with the café, viewing terraces and shop areas within the Clubhouse. The northern half of the Canal Park and Enfield Ditch Reserve will be part of the public space whilst access to the southern half will be restricted and protected for habitat restoration and to benefit wildlife.

11 The whole site will be contained within a 2.1m high metal vertical bar perimeter fence. This will also be used to separate the campsite from the Community Park and from the Canal Park. This type of fence is required to maintain security and open visibility for passive surveillance. Hostile Vehicle Mitigation (HVM) systems such as security bollards are incorporated into the car park,

whilst elsewhere in lower-risk areas softer more naturalistic treatments are deployed such as timber fencing and hedging. This approach is based on the 'QCIC Designing Out Crime Statement' (DOCS, Ref: 05764-01002a), applying a layered security methodology aligned with Secured by Design (SBD) and Crime Prevention Through Environmental Design (CPTED) principles, as well as national and local planning policy. It is understood the site will not be open 24 hours, although details of opening hours are not given.

12 The Surf Lake

The Surf Lake is to be created in the southern part of the site where the topography is most suitable. The surfing lake will be constructed partially below ground level (the Basement Impact Assessment Report indicates this will reach a depth below lake standing water level of 2.75m). Measuring approx. 282m by 84.5m the curved surf lake comprises a single body of water, powered by Endless Surf technology. This will deliver programmable waves for all abilities through pneumatic wave-generating chambers (48 in total) positioned along the backwall of the lake. A set down beach area will be located along its northern edge – this is described as a flexible all-weather space for surfers with stepped and planted terraces which connect the surf zone to the adjacent clubhouse. The immediate lakeside area will also provide spaces for beach sports such as volleyball and boules, integrated into earth bunds with green terraces, planted edges, and defined boundaries for screening and usability. To the west of the lake, there will be a beach sports area and kids' wet and dry play zones.

- 13 The Wave Generation Building** is a long low functional structure (158.7m x 9.4m) located along the southern edge of the lake and houses the surf lake's mechanical and water filtration systems. The building height is 5m and it has been designed to sit within the landscape submerged beneath planted bunds. It will include a bio-solar green roof. The earth mounding provides visual screening and natural acoustic buffering. This area will be accessed via a service road which runs along the western boundary of the site from the car park.

- 14 Two Landscape Pavilions** are proposed either side of the Wave Generation Building. These are timber-framed and timber clad rooms set within the landscape and designed for events and small gatherings with lake-facing views. They are proposed to be approx. 4-6m high and 8-12m wide. Plans also reference Landscape Rooms on the east and west boundaries of the lake. These are described as sheltered planted areas to be used for surf safety briefings and also as wellness-focused zones, featuring hot tubs.



Image above is an extract from the DAS showing the Surf Lake and Wave Generation Building. Activity Park shown on right side of image

15 **The Activity Park**

Immediately south of the surf lake is the Activity Park, an area designed for multi-generational activity and engagement. This will include surf viewing platforms, play spaces, cycle pump tracks, sports courts, skate areas, bouldering and rock-climbing structures and Parkour zones. An urban beach area and splash play area are also proposed. A designated area equipped to host pop-up units for catering and events is to be provided and a secondary access/entrance point along the eastern boundary enables the management of user flow. This access links into the service route that runs along the eastern boundary of the site through to the main site entrance point in the north.

In the southwest corner the plans show provision for an attenuation basin, a water management system treating onsite surface water and overflow from the lake. The water collected will be used for site-wide irrigation.

- 16 The eastern boundary of the Activity Park lies adjacent to the Enfield Ditch Reserve which forms the southern part of the Canal Park. It is understood that public access to this area is to be limited to protect the ecology and wildlife of the Enfield Ditch Reserve. It will be fenced off from the Activity Park and also sit behind the paywall fence. Public access for informal recreation and nature conservation will be encouraged in the northern part of the Canal Park which adjoins the Community Park and Campsite.

- 17 **The Clubhouse** building is located to the north of the surf lake and 'beach'. This will provide the main indoor spaces to support the surf use providing changing areas, WCs, surfboard hire, wetsuit drying and welfare areas. It is also intended that the clubhouse provides a focal point within the wider site with the remainder of the clubhouse to include staff offices, a surfing equipment and clothing shop, and a food and beverage element (café / restaurant) with roof top dining/ events terrace. The ground floor café and lakeside external terrace is designed to cater for 300 people whilst the rooftop events space accommodates an additional 150 covers.

- 18 Reaching a height of 8.6m and covering an area of approx. 2,500sqm across the two levels, the Clubhouse is described as having *“a cranked, angular plan that mirrors the geometry of the surf lake, carefully aligning its form to maximise panoramic views from terraces, cafés, and surf operations.”* Please see images at Appendix C. The building will be part single storey, part two storey with related terraces on the roof of the single storey elements. Wide roof overhangs and extending pergola structures provide shaded terraces at both ground and first-floor levels and have been designed to support seasonal expansion during peak activity. They also act to provide passive solar control and reinforce the *“pavilion-like quality of the clubhouse as a gathering point within the natural setting.”* An outdoor changing area is also provided sheltered beneath the first-floor terrace, designed to expand capacity during peak periods (It provides up to 70 additional changing spaces during summer). Indoors the surf operations include changing facilities and equipment collection for up to 30 guests per session. It is noted that the clubhouse will be available to the general visitor as well as surfers.



Image above shows Clubhouse, Surf Lake and Activity Park – taken from the DAS

- 19 The first-floor terrace provides an elevated promenade that stretches along the lake edge. It provides visitors with an accessible route linking arrival spaces to viewing points, enhancing landscape connectivity while creating opportunities for gathering and observation above the lakefront. Close to the entrance to the Clubhouse on the eastern side is an area dedicated to surfboard repair, with a general maintenance building and a Surfboard Shaper and Repair Hut (both 4.2m high and clad in timber singles). Surfboard Stores (approx. 3m high) providing integrated storage and rental facilities are positioned on both the eastern and western sides of the lake to provide easy access to surf equipment for both casual and dedicated surfers.
- 20 **Clubhouse Materials**
The Design and Access Statement states that the materials palette for the Clubhouse has been chosen to *“express a nature-first philosophy, ensuring the building feels deeply rooted in its landscape while embodying resilience, sustainability, and sensory richness.”* The entrance façade is defined by cut timber logs, creating a powerful tactile gateway into the building which will age and silver over time. Across the primary building volumes, natural timber

shingles are proposed as a lightweight, renewable cladding system which will also weather to muted greys and silvers *“echoing the tones of the surrounding grasslands, dune systems, and treescapes—allowing the Clubhouse to settle more deeply into its landscape”*.

- 21 Recycled aggregate stone and concrete plinths are proposed at ground level to form a resilient, textural base for the building that can withstand heavy footfall, surfboard traffic, and everyday wear. Galvanised steel is proposed for posts, brackets, balustrades, and detailing, offering a robust, low-maintenance counterpoint to the warmth of the timber. Biodiverse green roofs are also proposed planted with native wildflower mixes to further embed the building within its ecological context.
- 22 **The Campsite**
The existing camp site will be upgraded and existing facilities renovated. The three single storey wooden cabins already on site which provide the reception and facilities for campers will be refurbished to provide new toilets, showers and laundry facilities together with a new reception and office. Building heights are proposed to remain the same ranging from 3.7 m to 4.8m. the walls will be reclad with timber shingles with slate roofs and new windows and doors. Solar panels will be installed on the roofs. New lodges and cabins will be introduced to the existing camp site and a campsite green created for play, events and social interaction. The majority of the existing tree cover will be retained and enhanced with native planting and new pedestrian routes included to provide access into the Community Park, and wider The Wave London.
- 23 **The Community Park**
Situated between the campsite and the Clubhouse the Community Park is described as the heart of the site and will be designed and landscaped to support a wide range of recreational uses, from informal sports and seasonal events to nature-based play, picnicking and quiet reflection. Public access to the park will be available during The Wave’s operational hours, with occasional temporary restrictions during special events or for operational needs. A network of step free circulation routes will enable visitors to move comfortably through the park, accessing key features, amenities and spaces.
- 24 The DAS describes the key features to be provided which include, adventure play using natural materials and varied topography, woodland trails and multi-use paths, an orchard walk through seasonal fruit trees, a Community Green providing flexible space for informal games, events or group activities like yoga sessions and a park pond. A 4.9m high viewing platform is also proposed offering elevated views across the site. Inspired by the idea of a leaf canopy, the open-sided structure is formed from a lightweight timber frame, supported by sculptural ‘tree columns’ that create a sense of shelter without enclosing the space.

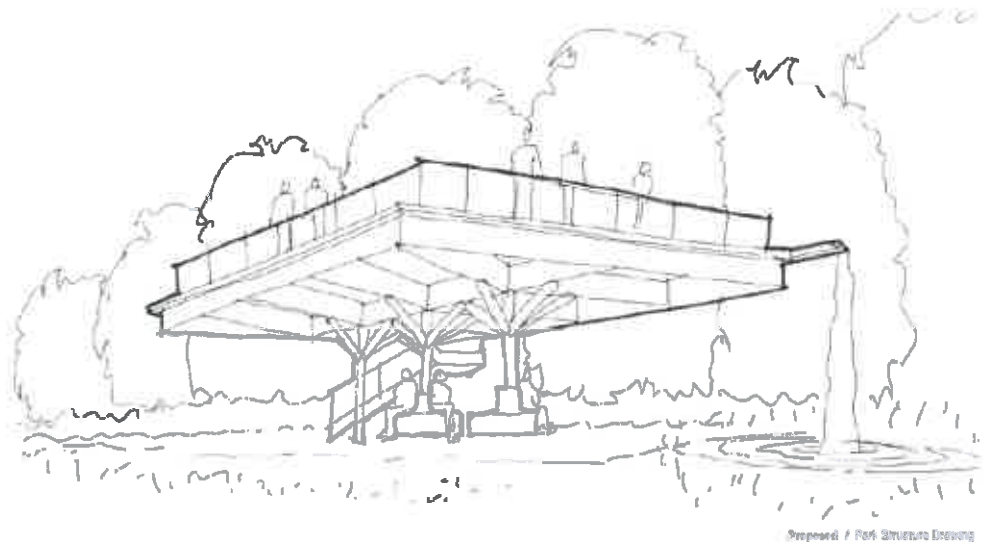


Image from DAS showing Viewing Platform

25 The Canal Park and Enfield Ditch Reserve

The applicant is proposing to restore the Enfield Ditch which runs parallel to the River Lee Navigation and create an ecologically rich corridor featuring new planting, wetland enhancement and nature-based walking routes. A network of low impact trails and small bridges spanning the restored Ditch will be provided with interpretation points and educational signage. Public access to the southern half of the reserve will be restricted so it can be protected as an area of habitat restoration with minimal disturbance. No trails are shown within the southern section.



Indicative view showing Canal Park and Enfield Ditch Reserve, image taken from the DAS

26 Transport Access and Parking

The existing access road to the application site is to be retained and used as the main entrance to The Wave. This links with the main entrance to the Lee

Valley Leisure Complex which connects with Meridian Way A1055, please refer to the plan at Appendix D taken from the Travel Plan submitted with the application. A Healthy Streets Transport Assessment (TA) and Travel Plan accompany the application.

- 27 A parking and drop off area will be located at this access point (to the west of the site entrance) to encourage users to walk (approx. 200m) to the main activity area and lake. 150 car parking spaces will be provided, of which 14 will be Blue Badge Spaces. 38 cycle parking spaces will be provided and space for coach parking. Provision for EV charging will be included equating to a provision of 10% i.e. 15 spaces in total. This car parking provision has been set on the basis of car parking surveys which have shown that at peak times (approximately 5-10 times per year), the existing car parks within the LVLC can be heavily utilised. Accordingly, and given the nature of the proposed development it is considered that some visitors to the site will travel by private car and this quantum of car parking will be needed to prevent overspill onto the surrounding network.
- 28 The TA confirms that the proposal is likely to generate a total of 3 servicing trips per day, with no articulated HGVs forecasted. The proposals provide an effective area of approximately 400sqm for the Servicing Bay, sufficient to accommodate the peak number and size of 1 x HGV and 2 x 7.5T Box Vans, as well as an additional 2 x 7.5T Box Vans in the unlikely scenario that dwell times overlap.
- 29 The DAS describes the approach to access as landscape-led *"balancing the needs of pedestrians, cyclists, public transport users and vehicles, while minimising traffic impact and maximising site permeability."* A series of pedestrian and cycle-priority routes are provided throughout the site; a network of shared paths link site entrances, key destinations, and activity zones. The applicant proposes that all principal routes across the site, including access to buildings, terraces, changing facilities, and recreational spaces, will be step-free and wheelchair accessible. The priority is to ensure ease of movement and navigation without the need for segregation or alternative routes. Please refer to the plan at Appendix E.
- 30 The Planning Statement concludes *"The development will result in additional walking and cycling trips (including additional Final Mode walking trips). The Applicant has proposed a series of works that will help to improve the journeys of both site users and those walking within the vicinity of the LVLC, including towards Ponders End Station. The development proposals are submitted alongside a Travel Plan which seeks to encourage active (walking and cycling)*
- 31 **Trip Generation**
The TA recognises that a large proportion of trips made to site are likely to be by car due to the location and nature of the development but that *"it is also likely that public transportation in combination with active modes of transport would be employed by a significant proportion of users"*. The maximum capacity of the Surf Lake would be 100 surfers an hour depending on the type of session offered; it could reduce to 20 surfers an hour for example if the surfers are more experienced. Forecast vehicle trip generation for the proposed development is considered to have minimal impact on the local highway network, with only an overall 1% increase in vehicle movements along Meridian Way/LVLC junction during the weekday AM peak and 5% during the weekday PM peak. A 13% increase in traffic is forecast during a peak hour weekend although this is noted

as representing an occasional scenario which is likely to fall on a weekend in summer and therefore outside the regular weekday peak traffic periods.

- 32 An Active Travel Zone Assessment (ATZ) is included as per Transport for London (TfL) guidance. The ATZ assessment considers a number of improvements to local cycle and pedestrian routes but concludes that none are *"considered to be the sole responsibility of the applicant to resolve in order for the development to be considered acceptable in planning terms and in accordance with the mitigation measures outlined in the NPPF (National Planning Policy Framework)".*
- 33 The applicant has however undertaken initial discussions with the Council regarding proposed bus stop improvements and is willing to engage in S106 discussions focusing on the existing bus stop and bus facilities at the LVLC Picketts Lock Centre interchange W8 service. The TA indicates that this might include contributions towards an improved bus shelter/seating, provision of an accessible crossing to the bus shelter, improved wayfinding to the bus shelter and the introduction of Real Time Passenger Information if required.

The applicant is also proposing to incorporate surfboard lockers within the Clubhouse in order to facilitate users travel to the site without dependency on car use.

34 **Landscape and Visual Impact**

The landscape strategy for The Wave embraces the site's existing assets, its natural form and existing resources in particular it's *"ecological assets - mature tree belts, expansive open grasslands, wetland margins, and its direct connection to the wider Lee Valley green and blue infrastructure"*. As set out within the DAS the landscape is structured around "three foundational pillars:

- Ecological Function: Strengthening and expanding habitats across the site, enhancing biodiversity, and embedding water-sensitive urban design (SuDS) strategies to manage surface water naturally and restore hydrological systems.
- Social Infrastructure: Enabling inclusive access, recreation, and community gathering through a legible, connected public realm that invites people to move, dwell, and interact with nature at every stage of their journey.
- Resilience: Shaping a landscape that can adapt to changing climate conditions, mitigate urban heat and flood risks, and support long-term ecological recovery and environmental stewardship."

- 35 Six interconnected 'landscapes' shape the visitor experience. First, a new Arrival Entrance which supports all modes of access and where visitors on foot or arriving by cycle are guided along a tree lined approach. If accessing the surf lake visitors are taken through a distinct entry point 'The Wave London Portal' before progressing along a contoured path with planted mounds; the 'Dune Walk' which ends at the Clubhouse Plaza. The Arrival also provides access into the second 'landscape' the Community Park where the golf course is to be transformed into a publicly accessible parkland with trails, wetlands and spaces designed for play and community gatherings.



Image taken from DAS showing The Wave London Portal with the Clubhouse behind.

- 36 The landscape character around the surf lake has two distinct areas, the Surf Park north lakeside with pavilions, surf support facilities, gathering spaces and social stepped seating areas and the south landscape which offers the Activity Park with space designed for recreation, sports and water-based adventure. The Campsite is the fifth landscape designed as an area for relaxing, with areas of grassland, hedges, shade and easy access to trails and nature. Finally, the Enfield Ditch Reserve is a wildlife focused landscape with habitat restoration initiatives proposed and limited access to its southern half.
- 37 The DAS presents a planting strategy based on a nature first approach which aims to *"maximise species richness, seasonal variation, and ecological function. The design promotes year-round biodiversity while enriching the visitor experience through sensory, textural, and visual diversity."* Please refer to Appendix F for an overview of habitats and landscape framework. Species lists, seed mixes and planting locations are proposed. The tree strategy builds upon the recommendations of the Arboricultural Report and focuses on the retention of all high-value Category A trees, selective removal of Category U trees (unsuitable for retention) where necessary for safety and ecological enhancement and the strengthening of woodland edges and habitat corridors, particularly along the western boundary and the canal corridor. Extensive mitigation tree planting is required and a 3:1 replacement strategy has been agreed so that for every tree removed, three new trees of appropriate species, structure, and climate resilience are planted.
- 38 **A Landscape Visual Impact Assessment (LVIA)** accompanies the application. This has identified that the proposed change in the type of leisure use on site from golf course to surf lake with associated clubhouse and various sports, play and green spaces/infrastructure would have *"a minor urbanising influence on the site itself albeit in the context of large-scale urbanising development at Lee Valley Leisure Complex."* It notes that the height and scale of proposed development would be below the existing built form in the

surrounding context and smaller in scale to the adjoining structures. It finds that away from the Site itself, effects on landscape character would be limited. *"The proposals would sit within a largely retained and enhanced landscape structure that would reduce the prominence of built form in the surrounding landscape."*

- 39 In terms of its Green Belt location the LVIA does not consider the proposals would be assessed as inappropriate or that they would cause harm to the openness or the character of the Green Belt in the immediate or wider setting. The assessment demonstrates that the proposed development could be successfully accommodated and assimilated into the surrounding landscape without causing significant harm to the wider landscape character or visual amenity of the wider landscape or Green Belt openness.
- 40 **Ecology and Biodiversity Net Gain**
The application is accompanied by an Ecology Survey and Assessment. This concludes that the majority of habitats on site are of low/moderate conservation value although the application site does include one habitat 'River channel' i.e. River Lee Navigation that is nationally significant, and a priority habitat as listed in the Natural Environment & Rural Communities (NERC) Act 2006. The site is also located close to habitats or sites that are nationally significant, the William Girling Reservoir SSSIs, Lee Valley (Special Protection Area (SPA) and Epping Forest SAC. Consultation with Natural England will be required to ensure any risk to the SSSI's, SPA and the SAC located within 5km of the site can be assessed.
- 41 The assessment has found that the proposed works have the potential to impact indirectly upon protected species, species of principle importance for nature conservation, schedule 1 species and BAP species (Biodiversity Action Plan) in the long term without the suggested mitigation measures. The surveys concluded that the site has associations with UK and European protected species which are likely to be impacted by the proposed works without mitigation or compensation. The report confirms that the proposed scheme will not directly impact Ponders End lake or the surrounding terrestrial habitat as this will be retained in its current condition.
- 42 The report confirms the presence of protected bat and bird species which should be protected through a suitable lighting strategy and the application is supported by a Lighting Strategy which restricts light spill into priority habitat areas. The presence of Otter was also confirmed and should be protected and habitats enhanced. Reptiles, badgers and water voles were all recorded as absent from the site, but provision should be made to encourage these species and other wildlife.
- 43 The ecological assessment recommends a range of mitigation including the installation of Otter holts and resting places, bat, bird and other wildlife boxes through to a wildlife protection plan and concludes that *"if the scheme proceeds with the proposed redline boundary and the suggested ecological mitigation, compensation and enhancements are followed then the scheme will not have a long term detrimental impact on the ecological receptors recorded on the site and will not adversely affect the continued ecological functionality of the area in the short, medium or long term"*.
- 44 **Biodiversity Net Gain**
The application is also supported by Biodiversity Net Gain Assessment. This shows that the proposed development will achieve a Biodiversity Net Gain

(BNG) score of greater than 25%. However, it fails to satisfy habitat trading rules for individual tree habitats and a further 12.15 biodiversity units for individual tree habitats, or habitats of higher distinctiveness is required. It is understood the applicant is considering options to provide the units through changes to landscape design and offsetting within the areas of the wider golf course outside the application boundary to the north, primarily through the creation of high distinctiveness wet woodland in suitable locations.

45 Noise Impact

A Noise Assessment has been submitted alongside the application and this has considered potential noise impacts from people using the surf lake, plant noise (including wave generation plant), use of the leisure park, e.g. sport courts, skate bowl, play areas and noise from temporary events. Noise impact from redevelopment of the campsite was not considered significant. A baseline survey was undertaken of existing noise levels at sensitive receptors – residential properties to the south along Pickett's Lock Lane and at a point adjacent to the Lee Navigation and some temporary moorings.

- 46 The Assessment took place in accordance with relevant national guidance and BS 4142 Methods for rating and assessing industrial and commercial sound. It concluded that *"the Maximum noise levels, LAfmax from both the Surf centre and leisure park are not considered likely to cause a significant adverse impact when considered in context of the existing noise environment"* and that Noise criteria based on the guidance in BS 4142 are proposed to ensure that noise from plant (including wave generation plant) – will be no greater than existing background noise levels. Noise from occasional events will be mitigated to prevent significant adverse impacts.

47 Lighting

An external lighting strategy has been submitted, this seeks to balance safety, wayfinding, and usability with sustainability, energy efficiency, and ecological protection. Light levels will be minimised to essential functional requirements, using high-efficiency fittings, warm colour temperatures (3000K or below), and cut-off optics to mitigate light spill and preserve dark-sky conditions. The proposed surf lake floodlight strategy has been modelled to show that the lake can be *"uniformly lit to an average illuminance of 200lux with limited horizontal spill beyond the surf lake perimeter, owing to advance optic and internal source visors of the luminaire"*. The applicant notes that further development of the strategy is required before implementation and is willing to agree a suitably worded condition to ensure a satisfactory lighting strategy is secured.

48 Sustainable Design

Details in the DAS demonstrate how the masterplan and architecture for The Wave have been designed to make best use of the land, reducing the need for additional infrastructure and preserving the site's natural character. Landform design *"through a cut-and-fill strategy minimises excavation, material importation, and environmental disturbance."* Remediation of contamination will be undertaken as part of the proposed earthworks and construction. The applicant states that the development will therefore improve the overall contamination levels by way of removal for construction. Re-use of suitable materials on site will be controlled by an Environmental Permit and in accordance with an agreed remediation strategy.

- 49 The buildings, circulation routes, and activities have been located to minimise environmental disturbance, while integrating with the existing green

infrastructure. The proposals are seeking to achieve “a careful balance between active use and ecological protection” across the site. Passive building design has been prioritised to reduce energy demand through building orientation, shading, ventilation, and insulation with the addition of green roofs and roof mounted solar panels. Efficient water use and sustainable drainage solutions are to be embedded throughout the site, reducing potable water demand and mitigating flood risks. Primary materials include sustainably sourced timber, recycled aggregates, and natural finishes selected for low embodied carbon. A case is also made for the longevity and adaptability of the site and buildings which have been designed to ensure that they can respond to changing environmental conditions, user needs, and technological developments without excessive resource use or operational disruption.

POLICY CONTEXT

- 50 **National Planning Policy Framework (NPPF) as revised December 2024**
Paragraph 151 encourages local planning authorities to plan positively to enhance the beneficial use of the Green Belt and look for opportunities “to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land...”
- 51 Paragraph 153 adds that when considering any planning application, substantial weight should be given to any harm to the Green Belt. ‘Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.’ Paragraph 154 of the NPPF outlines a number of exceptions to inappropriate development in the Green Belt which include the provision of appropriate outdoor sports and recreation facilities (154 b)). Paragraph 155 also states that commercial or other development in the Green Belt would not be considered inappropriate where amongst other things “the development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan,” (155a)).
- 52 The Glossary in the NPPF provides a definition of ‘grey belt’ which in summary is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. For information the 5 purposes of the Green Belt as set out at Paragraph 143 of the NPPF are as follows:
 - a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns; and
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 53 Paragraph 103 adds that “Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities and can deliver wider benefits for nature and support efforts to address climate change.”
- 54 **London Plan 2021**
A wide range of policies are relevant in terms of the current proposals. In

particular **Policy S5** (Sports and Recreation Facilities) emphasises the importance of developing sports and recreation facilities in accessible locations, well-connected to public transport with links to walking and cycling networks; proposals should maximise the multiple use of facilities between sports providers, educational providers, and other community facilities; and support the provision of sports lighting within reasonable hours where there is an identified need, providing the lighting would not cause demonstrable harm to the local community or biodiversity.

- 55 **Policy G2** (London's Green Belt) reflects the NPPF and states that development proposals that would harm the Green Belt should be refused except where very special circumstances exist. Subject to national planning policy tests, the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported. **Policy G4** (Open Space) and the explanatory text states that development proposals should create areas of publicly accessible open space, particularly in areas of deficiency. It recognises the wide range of social, health and environmental benefits provided by open spaces. **Policy G7** (Trees and Woodlands) aims to ensure that wherever possible, development proposals retain existing trees and that new tree planting is included in new developments, particularly large-canopied species as these provide a wider range of benefits.

- 56 Transport policies want all development to make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking, and cycling routes (**Policy T1 Strategic Approach to Transport**) and support capacity, connectivity and other improvements to the bus network, **Policy T3** (Transport Capacity, Connectivity and Safeguarding).

- 57 **Enfield Local Plan Core Strategy (2010) and Development Management Document (2014)**

Core Policy 33 (Green Belt and Countryside) outlines that the Council will continue to protect and enhance Enfield's Green Belt. Picketts Lock Leisure Complex (the site) is identified as a Major Development Site within the Green Belt where the Council will work with partners to guide appropriate future development that preserves and enhances the character of the Green Belt.

Core Policy 35 (Lee Valley Regional Park and Waterways) explains that the Council will work with the Lee Valley Regional Park Authority and other partners to improve access to the Lee Valley Regional Park, particularly from residential communities to the west of the park, focusing on Ponders End and Central Leaside; and will support the work of the Lee Valley Regional Park Authority (LVRPA) to realise the potential of the Lee Valley Regional Park.

Core Policy 36 (Biodiversity) outlines that the Council will seek to protect, restore and enhance sites, habitats and species identified for their biodiversity importance at the national, London or Borough level.

- 58 **Policy DMD 89** (Previously Developed Sites in the Green Belt) states that complete or partial redevelopment of sites on Major Developed Sites – such as Picketts Lock – will only be permitted where the proposal improves the character and appearance of the site and appearance from the surrounding Green Belt. New development must not have a greater impact on the openness of the Green Belt than the existing development.

59 The **Edmonton Leaside Area Action Plan (2020)** forms part of the development plan for this part of Enfield Borough. It includes Policy EL19 (Revitalising Developed Areas at Picketts Lock) which sets out the Council's and Lee Valley Regional Park Authority's plans to deliver a significant new development for Picketts Lock. New and improved leisure, sport and recreation facilities are listed among the suitable uses for the site, although proposals must be in conformity with Green Belt policies, which includes no net loss of site openness

60 The **emerging Local Plan**, which is currently under Examination includes a number of relevant policies including **Policy CL2 (Leisure and Tourism)** which states that proposals that will continue to develop a high-quality visitor experience to increase the contribution that tourism and sport make to our quality of life and social wellbeing will be supported, in particular:

- The provision of new and enhanced visitor attractions in accordance with the sequential test outlined in the NPPF for main town centre uses; and
- Proposals which promote greater use of rural parts of Enfield and the Lee Valley as a leisure and recreational resource.

Policy CL4 (Promoting Sporting Excellence) outlines that development proposals that align with the objectives of the Enfield Health and Well Being Strategy will be supported particularly when they align with the following criteria
b) They facilitate and contribute towards the development of first-class, publicly accessible strategic sport and leisure facilities to meet the needs of the growing population, based on the following hierarchy of priority locations as shown on the Policies Map, including:

- Land at Picketts Lock (RUR.06);

61 **Park Development Framework**

The relevant PDF Area Proposals are set out at 4.A.4 – Pickett's Lock and Lee Park Way. These proposals seek to develop Pickett's Lock as a strategic leisure destination. In the medium term the focus is on securing new golf facilities, hotel, spa and conference and commercial leisure facilities e.g. 5-A-side football. The camp site is to be enhanced with the provision of additional pods.

62 Proposals also highlight the need to work with stakeholders to improve the environment of pedestrian routes through to Pickett's Lock from Ponders End Station and surrounding communities and the need to improve pedestrian connections from the towpath via a new pedestrian and cycle bridge. It is noted that all development at Pickett's Lock will need to take account of the sensitivity of its Green Belt location and the need for improved public transport, pedestrian accessibility, high quality design and the protection and enhancement of existing ecological value especially along the Lee Park Way.

63 The Lee Valley Athletics Centre is to continue to operate and develop as a regional centre of excellence for sport providing world class facilities for users of all abilities. Existing training events, schools and club sports programmes should be expanded and new sports provision developed e.g. 'Parkour' training and Lee Valley Duathlon events.

64 Proposals under Biodiversity aim to improve the ecological interest of land around Ponders End Lake through fringe habitat and reedbed enhancement and to protect and enhance the ecological value of the Lee Park Way and the Lee

Navigation as a wildlife corridor providing continuity with and connectivity to other habitats within the Park.

- 65 The Lee Valley Regional Park Landscape Strategy recognises the need to maintain a balance between a popular recreational and leisure destination and an ecological asset at the Pickett's Lock site which falls within Landscape Character Area D Urban Valley Floor with Leisure Facilities. Areas of rich ecological habitat should be protected and new development concentrated around existing built form, integrating with the landscape framework and better physical connections should be sought for pedestrians and cyclists. The mixed woodland cover which creates a semi-enclosed character and visual variety is considered a valued characteristic and feature of the landscape.

PLANNING APPRAISAL OF PROPOSED DEVELOPMENT

66 Principle of Development

This application is proposing a major new leisure development within the Regional Park in Enfield which would form part of the existing Lee Valley Leisure Complex at Pickett's Lock. The scheme as presented, although lacking detail in some areas, demonstrates a coherent landscape-led approach to the creation of an inland surf lake, clubhouse and accommodation offer with a range of complementary recreational and sporting uses that would cater to a wide range of leisure interests and abilities both locally and from across the region.

- 67 The proposal is in accordance with the Authority's PDF Proposals under 4.A.4 which seek to develop Pickett's Lock as a strategic leisure destination. The new surf lake and Activity Park will expand the leisure offer available at the Lee Valley Leisure Complex consolidating its role as a regional, national and international leisure and sporting hub. The proposed renovation and upgrade of the existing campsite also accords with the PDF Proposals. The proposed leisure uses would complement the existing leisure provision within the wider site such as the Odeon Luxe Cinema and sporting activity and events at the Athletics Centre.
- 68 The creation of a Canalside Park based on habitat enhancements to the Enfield Ditch would assist in delivering the Authority's biodiversity proposals in terms of protecting and improving the ecological value of the Lee Navigation as a wildlife corridor and its connectivity to other habitats within the Park.
- 69 These proposals will require the golf course to be reduced in size. However, the golf course was included in the area originally marketed by the Authority as part of the Lee Valley Leisure Complex, Picketts Lock for future development and the proposed development will introduce a new more inclusive combination of leisure and recreational uses on the site whilst still retaining a golfing offer on land immediately to the north of the application site.
- 70 On the basis of the PDF Proposals the principle of the development can be supported.
- 71 In terms of the sites Green Belt designation policies within the adopted and emerging Local Plans support new outdoor sport and recreation at Pickett's Lock where this preserves and enhances the character of the Green Belt. The Enfield draft Local Plan has included a site allocation for the Lee Valley Leisure Complex which identifies the site for new sports, leisure and

recreation facilities.

- 72 The Planning Statement submitted with the application makes a strong case for most of the proposed development falling within exception 153b) of the NPPF being appropriate facilities for outdoor sport and recreation with *"each of the proposed buildings being required to enable the primary purpose of The Wave, to allow outdoor sport and recreation"*. The applicant has however also presented a Very Special Circumstances (VSC) case in accordance with para 153 of the NPPF. The factors presented to demonstrate this VSC case are supported. These factors, which taken together amount to the VSC, include the role and statutory remit of the Authority, and the existing policy context which identifies Pickett's Lock as a major developed site in the Green Belt and which supports outdoor sport and leisure uses. The multiple health and wellbeing benefits provided by surfing and outdoor recreation and sport are also included together with the positive social impacts that can be provided. This is a similar case to that made by the Authority for the successful Ice Centre redevelopment.
- 73 The Planning Statement also concludes that the application site is grey belt land, an argument with which officers concur in that the site does not strongly contribute to purpose a) of the Green Belt and makes no contribution to purposes b) and d).
- 74 The other matters to consider in the planning assessment are the impacts of the proposal on the landscape and visual amenity of the Park, the impact on the ecology of the site and, in relation to the wider LVLC, issues relating to transport and access.
- 75 **Impacts on Landscape and Visual Amenity**
The findings of the LVIA concluded that the proposed development would have *"a minor urbanising influence on the site itself"* although this would be seen in the context of the existing development at the LVLC. The effects on the wider landscape would be limited owing to a largely retained and enhanced landscape structure that would reduce the prominence of built form in the surrounding landscape. These findings are endorsed by officers and the impact of the proposals on the landscape of the Regional Park and its visual amenity considered acceptable, given the scale of change proposed and the extent of new leisure and open space provision.
- 76 The nature-based approach promoted by the Landscape Strategy is welcomed; it is important in terms of reducing landscape and visual impacts. The Strategy aims to enhance the existing landforms, grasslands and wetland margins and retain tree groups and mature tree belts on the northern, eastern and southern sides. The proposed 3 to 1 replacement strategy is supported. However, it is noted that a significant number of trees, tree groups or parts of tree groups will be removed and that the negative impact of these works is to be limited and mitigated by the establishment of a wide range of tree and hedgerow planting across the site (the proposed tree plan indicates 935 new trees of varying species and sizes). The Arboricultural Report states this will result in a neutral impact to the site in the medium to long term.
- 77 The provision of more detailed landscape and planting plans will need to be secured by condition should the Council be minded to grant consent. In particular it is important that the existing mature trees that provide a landscape buffer to the site are retained as far as possible as they are a key feature of

the Regional Park and its landscape character. Detail of the tree planting along the western boundary of the site which is shared with the LVAC is important as a number of the existing tree groups are identified for removal. Compensatory planting will need to re-establish a green edge and buffer between the two sites, whilst allowing for partial views into and across both areas. Planting will also need to accommodate the service road which runs alongside this western boundary. This buffer will take time to mature, and consideration should be given to future management and maintenance of this and all tree planting; a minimum five-year plan for all landscape proposals is recommended in the Arboricultural Assessment report. It is noted that all works are to be carried out in accordance with an Arboricultural Method Statement and according to best practice, to limit impacts to the trees to the lowest possible level and this is welcomed.

- 78 The detailed landscape and planting plans should be based on a native planting palette and should be accompanied by an Ecological Landscape Management Plan to demonstrate how these landscapes will evolve and be managed over time. The planting scheme referenced in the DAS includes native species but also proposes ornamental planting. The Lee Valley Ice Centre is as an example of best practice in respect of native planting.

79 **Visual**

In terms of the landscape and visual impacts of the surf lake, Wave Generation building and clubhouse, these have all been carefully located in the southern part of the site where the topography is generally at its lowest. This also means the main new built forms associated with this development are positioned close to the Athletics Centre and outdoor track. The surf lake will sit partially within the landscape and provide an attractive focal point adding a new dynamic to the landscape. Both the Clubhouse and Wave Generation building are also 'embedded' in the landscape owing to their associated sculptured landforms and earth mounding which provides both visual screening and a degree of natural acoustic attenuation/buffering. The Wave Generation Building has a linear low-profile mass which minimises its visual presence to a degree and the proposed green biodiverse roof will help the building to merge with the surrounding landscape even with the addition of solar panels.

- 80 The Clubhouse at 8.6 m tall will sit lower than the adjacent Athletics Centre (10 to 12 meters) reducing the height and massing of development as it approaches the open parkland areas of the Park. The design of the Clubhouse ensures it has sufficient presence within the landscape and flexibility to perform as the central hub for visitors – both general park visitors and surfers whilst not appearing dominant in that landscape. The use of natural materials are important in this respect allowing the building to blend in with its surroundings. The use of covered terraces, pop up structures and covered outdoor changing is an appropriate response to the issue of seasonal variations in visitor numbers that makes efficient use of space and adds interest to the design of the building. The ability to view the lake and surrounding parkland from its upper terrace will offer exciting new perspectives on the wider site and Regional Park landscape.
- 81 Proposed enhancements to the Campsite will improve the appearance of the built facilities and their landscape setting and enable the site to better integrate with adjoining areas such as the Community Park. Further details should be provided on the raised viewing platform or Park Structure and how it

- would relate to the surrounding landscape; although the provision of an additional view point across the site could be seen as a positive it is not clear why there needs to be such a large raised structure in this location, given it sits on top of an existing mound ('The Wave Mound' as shown on the plans for the Community Park) from which there are views across the Park area.
- 82 The landscape of the Community Park creates a variety of spaces from adventure playground to open lawn, community picnic and BBQ area to mounded meadow trails and community Orchards. The ambition to activate this space and provide multiple areas of visual and activity interest is welcomed but may be difficult to establish and then to maintain as a high-quality recreational landscape over time.
- 83 The applicant has acknowledged the need for greater clarity on how the public park, associated green infrastructure and access routes are to be managed (potentially via a long-term stewardship model in partnership with The Wave with the potential for collaboration with local organisations) and it is understood that discussions are underway to define a full Management and Maintenance Plan to include access, landscape care, ecological monitoring and SuDS upkeep. This should be secured via a planning condition or S106 agreement.
- 84 **Ecology and Biodiversity Net Gain**
Impacts on ecology and the provision of BNG have been addressed as part of this application. The ecology report has identified the ecological constraints and is clear that the footprint of the proposed scheme will result in the loss of on-site habitat. It is therefore essential that it is replaced with native species planting and that the mitigation/compensation measures set out in the ecology report are undertaken and secured via conditions.
- 85 The mitigation proposed requires a lighting strategy to be provided; this should take account of sensitive ecological receptors in accordance and with reference to the ILP Guidance Note 08/23 - Bats and artificial lighting in the UK. Proposed lighting of the new scheme should restrict light spill into current and retained site habitats to help aid night-time wildlife especially the east of the site. This should be secured via condition.
- 86 The other mitigation measures are also endorsed and will need to be secured by condition. These include the need for development to take place under the provisions of a wildlife protection plan, which will include methods to protect; birds, bats, amphibians, reptiles, Otters and Hedgehog and the provision of a working monitoring strategy to cover all ecological receptors identified during the assessment. The detailed design plans should include provision of bat and bird boxes, otter holts/resting sites along the canal boundary and hedgehog nest boxes and hedgehog friendly fencing, the provision of deadwood habitat and hibernation sites for reptile's species to use the site in the future.
- 87 A number of these matters would be covered by a CEMP. Although a Construction Management Plan has been submitted with the application this needs to be revised to include site specific detail and to widen the scope of the section on ecology to cover these environmental aspects. As mentioned above (para 78), an Ecological Landscape Management Plan should be conditioned to ensure the additional planting and habitat creation is maintained over time. This could be linked to the Biodiversity Gain Habitat

Management and Monitoring Plan if appropriate.

88 Enfield Ditch

The Landscape Strategy as outlined in the DAS proposes the restoration and naturalisation of the Enfield Ditch to form part of a 'layered hydrological and habitat system'. It is considered part of the wider SUDS strategy for the site, will enable surface water management and be preserved as an area of habitat restoration. It will include attenuation ponds, reedbeds, restored wetlands, and water-edge trails although the latter are provided only within the northern half.

89 This strategy for Enfield Ditch is backed up by the ecological surveys which have demonstrated the importance of the River Lee Navigation boundary in the east of the site. Breeding and foraging birds, foraging bats and otters have all been more regularly recorded along this channel boundary. This also corresponds to areas of low lux levels. Restricting public access in the southern part of the Canal Park/Enfield Ditch is supported, this will be important in achieving a wildlife reserve whilst maintaining connectivity with adjoining habitats and the SMINC.

90 The applicant is proposing that detailed planting design species selection and hydrological details are provided at the next design stage (DAS page 127) to ensure full SUDS performance. This will need to be secured via a planning condition together with an ecology strategy, implementation phasing and public access restrictions.

91 It is noted that a BNG score of greater than 25% can be achieved on site as a result of the development proposals and this is welcomed. It is also noted that the applicant still needs to satisfy habitat trading rules and a further 12.15 biodiversity units for individual tree habitats, or habitats of higher distinctiveness is required. Officers would be keen to see this achieved on site via changes to the landscape design. If this is not possible offsetting within the areas of the wider golf course and Ponders End Lake immediately to the north of the application would be supported as this would improve biodiversity within the Regional Park. This could be feasible through a combination of reedbed creation, tree planting and lowland meadow creation alongside the management over the required period. The Authority should be consulted on the BNG Plan and associated Habitat Management and Monitoring Plan (HMMP) should planning consent be granted.

92 Issues Relating to Access and Transport and Trip Generation

The Wave London will share the same access point and internal access road into the LVLC from Meridian Way A1055 as the existing venues and event spaces at the Lee Valley Leisure Complex. There is concern as to whether the transport surveys have captured the full picture of trip generation and movement and level of impact on the Meridian Way/LVLC junction. The Trip generation methodology has focused upon the trips associated with the Surf Lake considering the ancillary leisure and recreation facilities as unlikely to result in material changes to the number of trips generated on the basis they will be linked to the Surf Lake trips or other venues already on site, or form part of a local visit as part of a wider trip.

93 It should be noted that this approach to the trip methodology was agreed in principle with TfL as part of the pre-app discussions held last year. However, the surveys undertaken to ascertain the trip generation characteristics of the

- current uses on site were completed in 2022 and are now 3 years old. At that time too the LVLC was still recovering from the impact of the Covid pandemic and officers have noted a steady increase in use and numbers since. Officers have already proposed to The Wave that new surveys should be undertaken over the course of this Summer, and in particular that these should include key busy times when multiple events are taking place for example. The LVLC calendar of events and activities has been shared with TW and their transport consultants. It would also be important to consider any trips generated by the proposed events space within the Community Park and events held at the Surf Lake. These additional surveys should be conditioned and any mitigation or improvements required to the internal access routes and Meridian Way/LVLC junction provided for consideration before the commencement of development.
- 94 An Operational and Events Management Strategy and activation plan should also be conditioned to ensure overarching principles are in place to guide the management of safe and inclusive sporting and community events on the application site, i.e. the surf lake, activity park and within the community park and in association with events within the wider LVLC. This would need to cover the detail of the new Terrorism (Protection of Premises) Act 2025 which includes security and emergency access requirements and consider both construction and operational phases. It would also be the document within which to set out any noise mitigation measures required as proposed in the Noise Assessment. The Authority should be involved in the production of this Strategy.
- 95 The proposal to include a car park is noted and accepted on the basis that at peak times car parking provision within the LVLC can be at capacity. It is noted that the Travel Plan submitted with the application incorporates a Monitoring Strategy as part of its implementation. This strategy will collect data from users to ensure the travel characteristics of the site can be understood over time with the aim to reduce car driver mode share to access the site and increase public and active modes shares over time. It is understood that regular monitoring reports will be provided to the local planning authority (LPA) and the Authority would wish to be consulted on these and any measures that help reduce private vehicle usage over time.
- 96 Proposals to improve the Pickett's Lock bus interchange which serves the W8 bus route are supported and should be secured via a Section 106 agreement as proposed by the applicant.
- 97 The applicant has also discussed a range of other sustainable transport options with the Council during the pre-app process including local cycle network and pedestrian route improvements but decided that the bus interchange improvements are likely to have the largest impact on sustainable travel improvements. Enhancements to the existing footway and cycle land along Meridian Water towards Ponders End were also identified during pre-app discussions. This would be an appropriate measure to also consider as a means of improving sustainable transport choice, perhaps during a later phase of the development. It would align with the design measure proposed in the Travel Plan and DAS which include the provision of accessible and safe arrival routes to The Wave including cycle and pedestrian routes that are well connected to the site entrance and bus stop. The Planning Statement also references *"The Applicant has proposed a series of works that will help to improve the journeys of both site users and those walking within the vicinity of*

the LVLC, including towards Ponders End Station" although this is not evident in the Travel Plan.

Appropriate S106 contributions should be sought for pedestrian and cycle access improvements along Meridian Water towards Ponders End Station.

98 Boundary Treatments Access

The DAS provides information about the boundary types and treatment for the whole site and its various components. It is understood that The Wave are seeking to balance security requirements and different functional needs with ecological integration and landscape character. It will be important to ensure the measures deployed by The Wave support and complement the security and safety control measures already in use on the wider LVLC site. The DAS states that *"full detailed specification, installation design, and technical compliance checks will be developed during the next design stage in collaboration with specialist consultants"*. The Authority should be involved in this specification and detailed design process and consulted on the next design stage in due course.

- 99 Details of the boundary treatment are also important in terms of protecting the ecology of the Enfield Ditch Reserve, the southern part of the Canalside Park and achieving the desired habitat restoration. Further detail will be required to show how the proposed Gabion Basket boundary which divides the Canalside Park in two will prevent people from entering the Enfield Ditch Reserve in the south. Likewise, more detail on the boundary treatment along the western edge of the Enfield Ditch Reserve would be helpful as this is proposed as a hedge with timber post wire and is meant to prevent access from the Activity Park. These matters should be covered by an appropriate condition attached to any grant of consent.

100 Lighting

It is positive to see a lighting strategy produced at the outset and for light pollution to be considered in the ecological report. For both the Community Park and Activity Park the area that interfaces with the Canal Park and Enfield Ditch Reserve will need careful consideration. The photographs included within the Lighting Strategy which indicate the measurement points taken across the golf course show how dark the eastern section of the site is at night with the existing foliage along the perimeter providing a shield from external light sources. This dark corridor and its boundary with the two parkland areas should be retained to maintain and protect the wildlife importance and connectivity of the waterside wildlife corridor (also part of the SMINC). The Strategy refers to the ILP and account should be taken of the ILP and Bat Conservation Trust Guidance Note (GN08/23 Bats and Artificial Lighting at Night to ensure light spill and pollution is minimised.

- 101 The Authority would wish to be consulted on the lighting strategy as it is further developed particularly in relation to the cumulative impact of floodlighting for the Surf Lake and the Lee Valley Athletics Centre and to consider how this can best be mitigated to avoid light spill. Lighting of the application site will also need to complement the existing LVLC lighting, and this will need to be examined in further detail.

102 Conclusion

The application proposes a major new leisure development at the LVLC which would cater to a wide range of leisure interests and abilities both locally and

from across the region. The proposal is in accordance with the Authority's Park Development Framework (PDF) Proposals under 4.A.4 which seek to develop Pickett's Lock as a strategic leisure destination and will deliver new areas of recreational open space and biodiversity. Details are lacking in certain areas but these are matters that can be dealt with via conditions and a Section 106 agreement should the Council be minded to grant consent for the proposal.

ENVIRONMENTAL IMPLICATIONS

103 These are addressed in the body of the report.

FINANCIAL IMPLICATIONS

104 There are no financial implications arising directly from the recommendations in this report.

LEGAL IMPLICATIONS

105 Planning applications referred to this Authority are submitted under the consultative arrangements of Section 14 (4-7) of the Lee Valley Regional Park Act 1966. The Act requires a local planning authority to consult with the Authority on any planning application for development, whether within the designated area of the Park or not, which might affect any part of the Park.

106 The Park Act enables the Authority to make representations to the local planning authority which they shall take into account when determining the planning application.

RISK MANAGEMENT IMPLICATIONS

107 There are no risk management implications arising directly from the recommendations in this report.

EQUALITY IMPLICATIONS

108 There are no equality implications arising directly from the recommendations in this report.

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BACKGROUND REPORTS

Consultation by Enfield Borough Council

May 2025

APPENDICES ATTACHED

Appendix A	Location and Context Plans of the application site
Appendix B	The Wave Proposal – extract from the DAS
Appendix C	Clubhouse images
Appendix D	Access arrangements extract from Travel Plan
Appendix E	Movement and Access extract from DAS

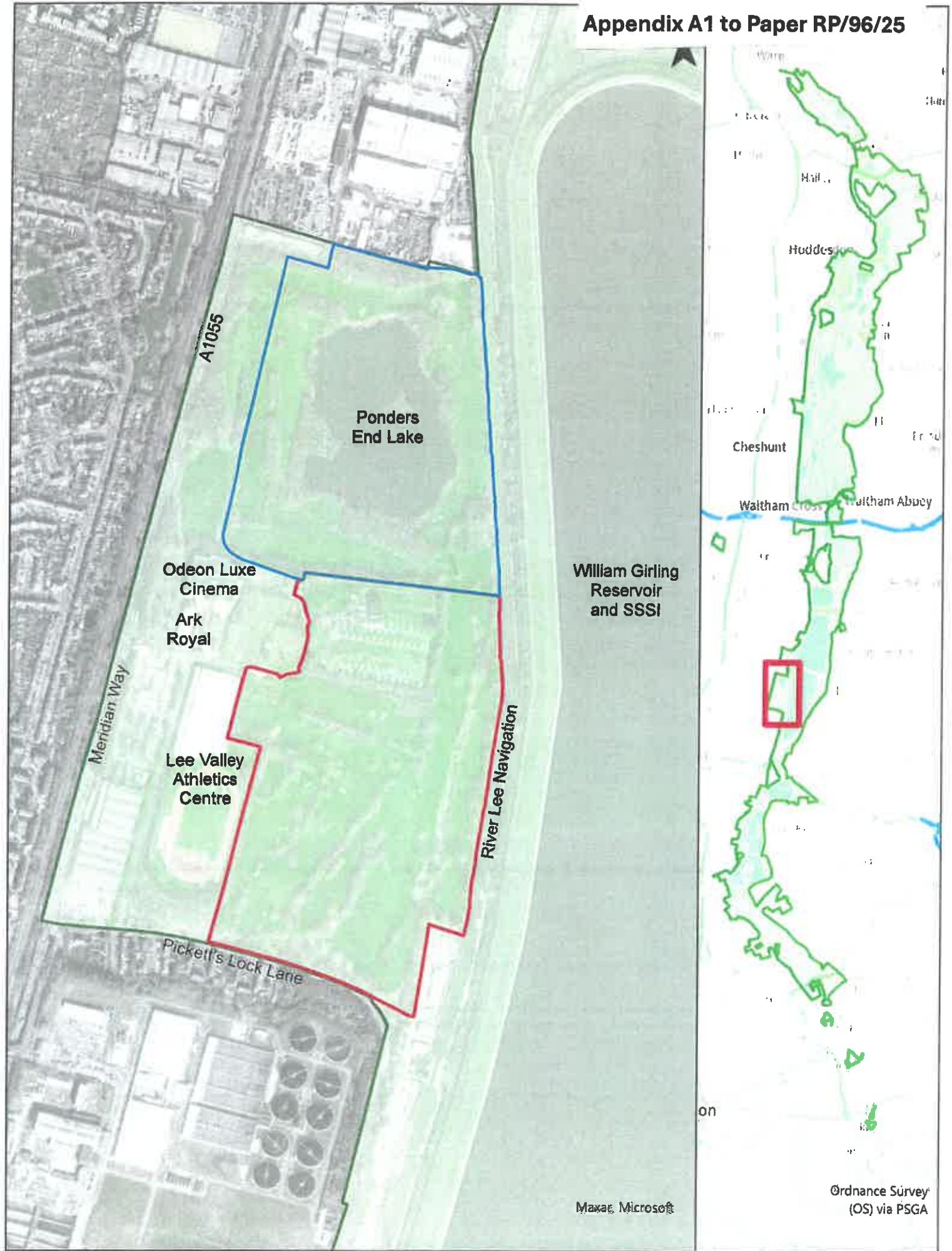
Appendix F

Landscape and Habitats overview extract from DAS

LIST OF ABBREVIATIONS

BNG	Biodiversity Net Gain
SuDS	Sustainable Drainage Systems
CEMP	Construction Environmental Management Plan
SPA	Special Protection Area
PDF	Park Development Framework
LVRP	Lee Valley Regional Park
SAC	Special Area of Conservation
HMMP	Habitat Management Monitoring Plan
LVLC	Lee Valley Leisure Complex
ILP	Institute of Lighting Professionals
NPPF	National Planning Policy Framework
SSSI	Site of Special Scientific Interest
SMINC	Site of Metropolitan Importance for Nature Conservation
NCN	National Cycle Network
LVRPA	Lee Valley Regional Park Authority
EA	Exclusivity Agreement
HVM	Hostile Vehicle Mitigation
SBD	Secured by Design
CPTED	Crime Prevention Through Environmental Design
DAS	Design & Access Statement
TA	Transport Assessment
ATZ	Active Travel Zone
TfL	Transport for London
LVIA	Landscape Visual Impact Assessment
NERC	Natural Environment & Rural Communities
BAP	Biodiversity Action Plan
VSC	Very Special Circumstances
LPA	Local Planning Authority

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The Wave Application - Location Plan

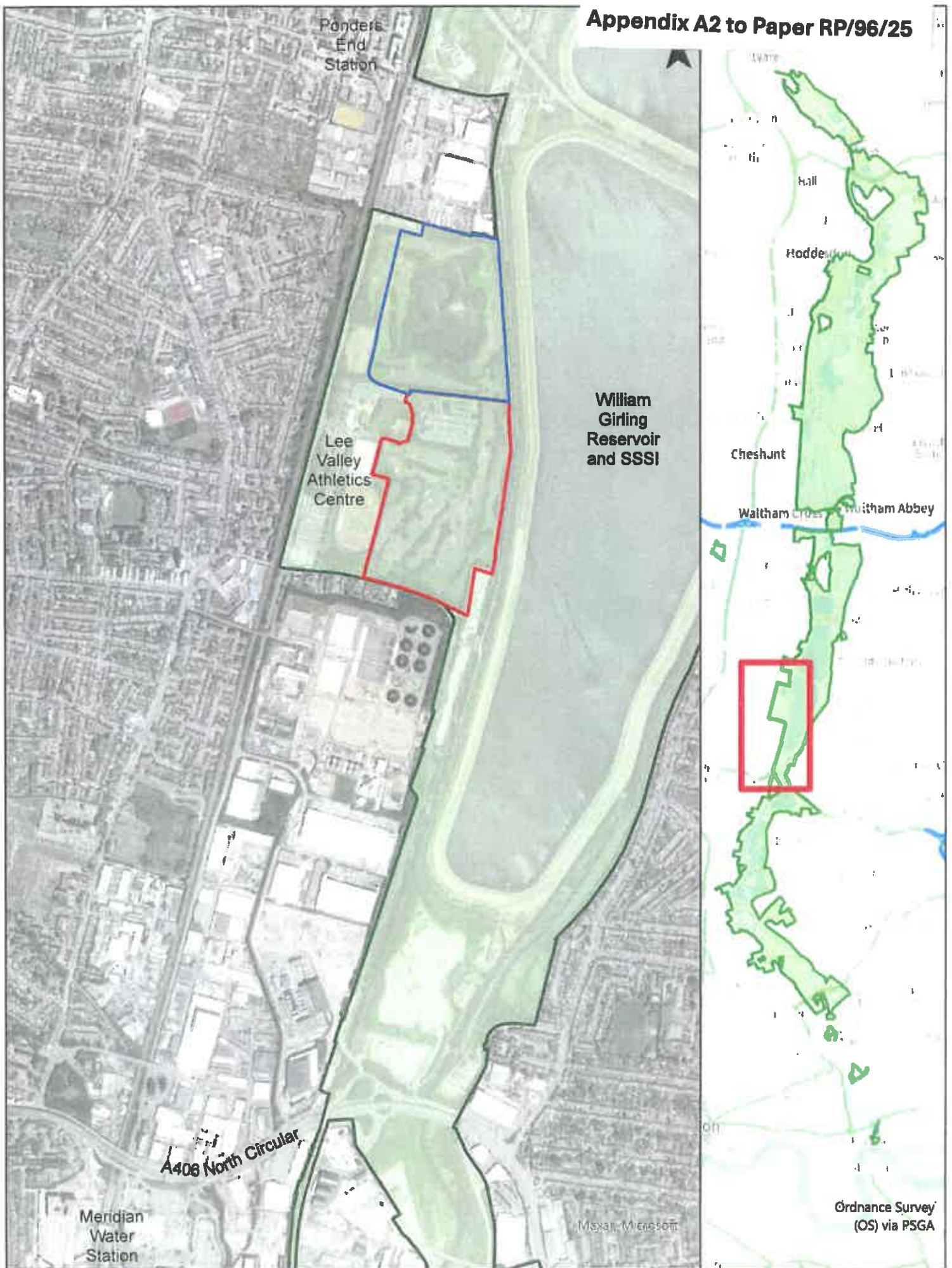
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15/07/2025

Produced by Corporate GIS (HH)

29

- Application Site
- Proposed area to be included in land leased to The Wave
- Park Boundary

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Extracts from the Design and Access Statement - Site Masterplan showing main components of The Wave Proposal

VISION - FRAMEWORK

45



Masterplan - Character

1. The Arrival Entrance
2. The Lakeside
3. The Activity Park
4. The Community Park
5. The Canal Park
6. The Campsite



Images from DAS of the Clubhouse showing view of southern elevation overlooking the Surf Lake and below left the approach to the entrance and on the right part of the area in front of the building

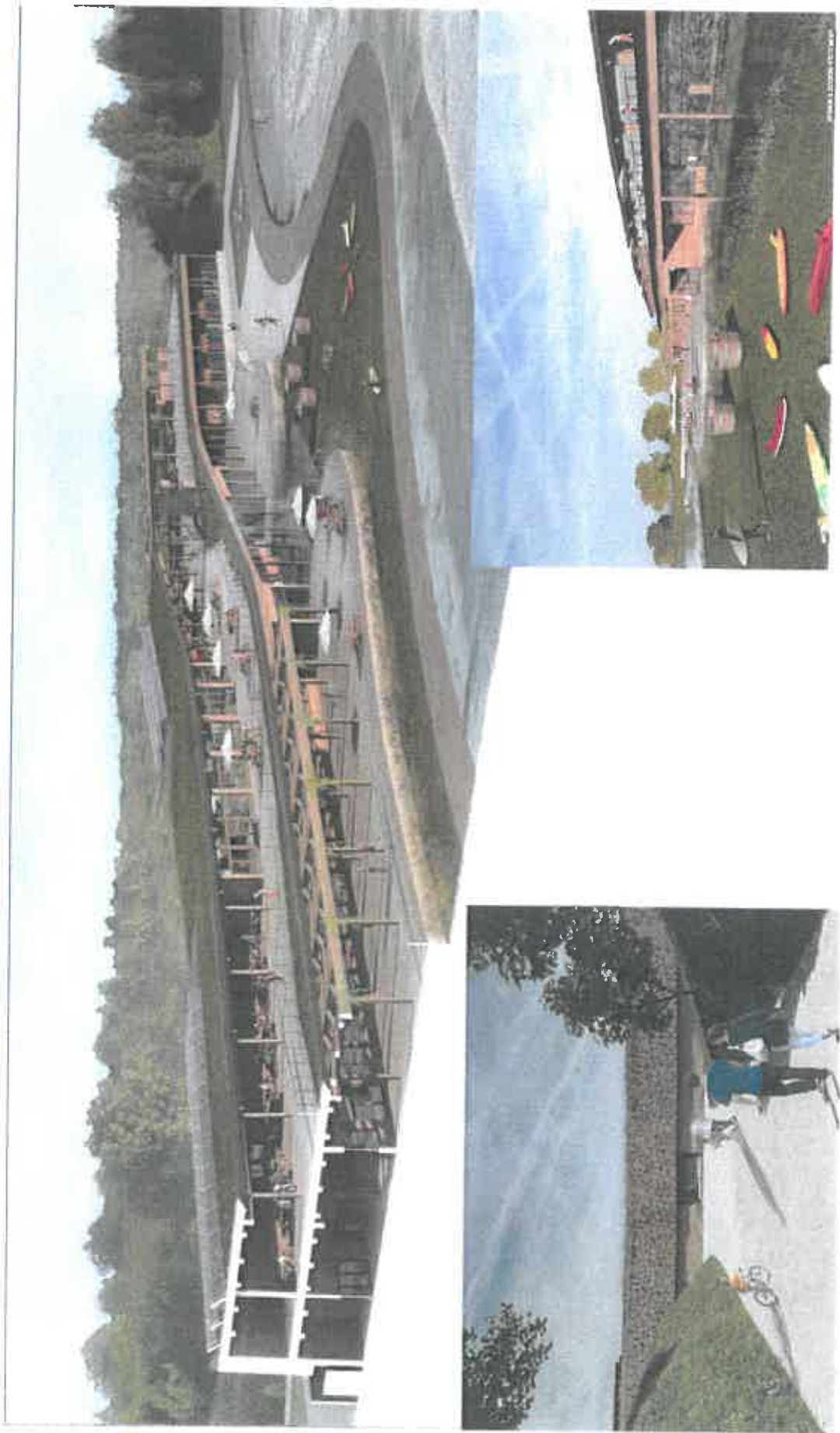


Figure 3.1

Internal Road Layout
The Wave

Key:  Site Boundary

Source: MOOWD



Date: April 2025

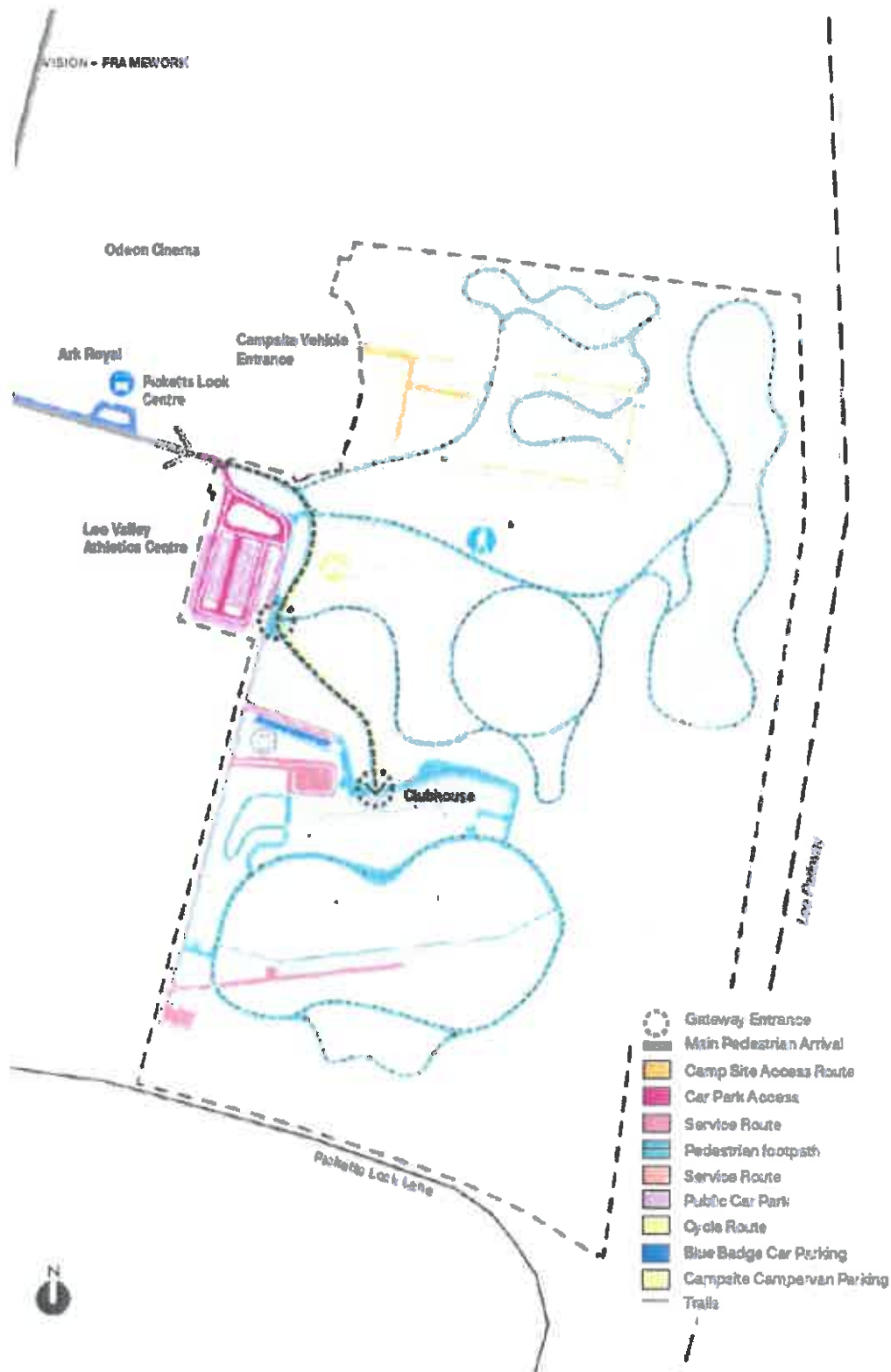
Project Number: Z5087



THE WAVE, ENFIELD
London Borough of Enfield

 **MARKIDES ASSOCIATES**

Movement and Access – plan taken from DAS



Landscape and habitats overview - extract from DAS

VISION - FRAMEWORK

36

