

**LONDON BOROUGH OF ENFIELD DRAFT MERIDIAN WATER
WESTERN BANK SUPPLEMENTARY PLANNING DOCUMENT
CONSULTATION**

Presented by the Head of Planning.

SUMMARY

The draft Meridian Water Western Bank (MWWB) Supplementary Planning Document (SPD) has been issued for public consultation by the London Borough of Enfield. The purpose of the SPD is to provide more detailed planning guidance to existing regional and Local Plan policies to deliver high quality placemaking and co-ordinated sustainable development on the Meridian Water Western Bank. Once adopted the SPD will be a material consideration in determining planning applications.

Although the majority of the MWWB lies outside the Regional Park, apart from the River Lee Navigation and a thin strip of land north of Tottenham Marshes, its transformation will enable important connections and new areas of public open space to be delivered. These will improve access into the Park for visitors (making use of the Meridian Water Station) and enhance the green and blue infrastructure between Tottenham Marshes in the south and the Lee Valley Leisure Complex and adjacent William Girling and King George's reservoirs to the north.

The Authority's comments are set out in the letter attached as Appendix A to this report.

RECOMMENDATIONS

Members Approve: (1) the comments as set out in Appendix A to this report as the Authority's formal response to the consultation by the London Borough of Enfield on the draft Meridian Water Western Bank Supplementary Planning Document.

CONTEXT

1 The purpose of the Meridian Water Western Bank Supplementary Planning

Document (SPD) is to provide more detailed planning guidance to Enfield's adopted development plan. This consists currently of the National Planning Policy Framework (NPPF), the London Plan, Enfield's Core Strategy (2010), the Development Management Document (2014), the Edmonton Leaside Area Action Plan 2020 (ELAAP) and the North London Waste Plan (2022). Enfield's Core Strategy identifies Meridian Water as a Place Shaping Priority Area and the ELAAP articulates in greater detail how Local Plan policies will be implemented to deliver a sustainable urban neighbourhood at Meridian Water, including a new town centre, and associated community infrastructure and public open space to help meet existing and future housing needs.

- 2 Once adopted the SPD will be a material consideration in determining planning applications. It does not introduce new policies, rather it provides more detailed guidance as to how the ELAAP will be implemented spatially. Its guidance will be applied to the Western Bank area and all planning applications within the designated area.
- 3 The Meridian Water Western Bank (MWWB) sits to the west of the River Lee Navigation including the waterway within its boundary. Its northern boundary is formed by the North Circular Rd, with the Eley's Estate beyond designated as Strategic Industrial Location (SIL). The southern boundary is shared with London Borough of Haringey and runs along Leaside Road with Tottenham Marshes and the Brantwood Industrial estate immediately abutting. The residential community of Edmonton form the western boundary. The area is occupied by large stores and cleared former industrial sites. The Tesco and Ikea stores are located in the centre of the SPD area although Ikea closed in August 2022. To the east of these stores two waterways converge; Salmons Brook and Pymmes Brook. The Ravenside Retail Park is situated in the north east and Meridian Water Station is positioned on the western part of the site.
- 4 Although previously occupied by industrial-related businesses, planning consents have been granted for mixed-use redevelopment of the area, including Phase 1 (ref 16/01197/RE3) which will deliver up to 725 homes, and the Phase 2 outline (19/02718/RE3) which will deliver up to 2,300 homes. The first stage of the Phase 1 consent is under construction, providing 300 homes. A second application for Phase 1b (ref 21/04742/FUL) is currently under consideration. Strategic Infrastructure Works (SIW) have also been consented (ref 19/02717/RE3) and these will deliver the east-west central spine road and utilities corridor, bridges, flood remediation works and new open space.
- 5 The Authority responded to the both the SIW application and the outline Phase 2 application in October 2019 (report RP/33/19) supporting the creation of Edmonton Marshes within the Park. The response also sought to ensure that improvements to access connections between Edmonton Marshes and land within the Park to the north of the North Circular were included as part of the Design & Access Statement, and that the Authority was involved in the detail planning of links to the south, between Brooks Park and Tottenham Marshes. Issues relating to biodiversity, lighting, access and bridge design were also raised in respect of the Phase 2 outline application.
- 6 The reserved matters application for Plot Z02-01 of Phase 2, (22/02098/RM) which lies close to the boundary with Tottenham Marshes and which Members considered in Sept 2022, is still under consideration by Enfield Council; this will, if permitted deliver 274 homes (RP/61/22). The Authority recommended that further consideration should be given to the relationship between the

development and the Regional Park, in particular the need to lower the heights of residential block situated close to the Park, and to the treatment of the south and south east boundary of the development site to improve the physical and visual interface with Tottenham Marshes and create an attractive entrance point into the Regional Park.

- 7 The vast majority of the MWWB sits outside the boundary of the Regional Park, except for the River Lee Navigation and a thin strip of land north of Tottenham Marshes. Please refer to the Plan at Appendix B to this report. The linear waterway corridor created by the Navigation and its accompanying towpath is designated as a Site of Metropolitan Importance for Nature Conservation (SMINC). This is the linking feature that connects the Regional Park at Tottenham Marshes in the south with green belt land abutting the William Girling Reservoir Site of Special Scientific Interest (SSSI) in the north. Further to the north is the Lee Valley Leisure Complex at Picketts Lock. To the east of MWWB lies the rest of the Meridian Water area, including the proposed Edmonton Marshes, a new area of public green space which is within the Park. Further to the south east lies Banbury Reservoir also within the Park and approximately 1km away are the Walthamstow Wetlands, a designated SSSI and part of the Lee Valley Special Protection Area (SPA) and Ramsar site.
- 8 Pymmes Brook which runs through MWWB from the north continues south to form part of Tottenham Marshes, establishing another link with the Regional Park. Leaside Road which runs along the southern edge of MWWB also provides access for pedestrians and cyclists onto Tottenham Marshes from the west. Please refer to the context plan at Appendix C to this report.
- 9 **Park Development Framework**
The Authority has detailed proposals for those areas of the Regional Park which lie in the Enfield Borough through the Park Development Framework (PDF) Area Proposals. Specifically Area 4 Proposals 'The Waterlands: Banbury Reservoir to Pickett's Lock' recognise the opportunities for land restoration, creation of new habitats and improved public access on land south of the North Circular linked to the development proposed as part of the Meridian Water masterplan.
- 10 The Authority is a key stakeholder in the Borough and there have been ongoing discussions between officers in respect of the Meridian Water masterplan and more recently early engagement on the priorities for the Western Bank area as these might relate to the Regional Park.
- 11 **Next Stages**
The purpose of this consultation is to seek public views on the scope and content of the draft SPD. The responses received during the consultation will inform the final version of the guidance which will be formally adopted as a Supplementary Planning Document in 2023.

DRAFT SPD VISION, OBJECTIVES AND GUIDING PRINCIPLES

- 12 The draft SPD sets out a Vision for 2032 which presents the western bank of Meridian Water as a highly sustainable mixed-use part of the Edmonton community. This includes restored waterways and new open spaces which will "knit this new community into the rich blue and green networks, helping to open up access to the Lee Valley Regional Park". The objectives accompanying the Vision highlight the need to build a sustainable urban neighbourhood, facilitate economic growth, improve connectivity and active travel, deliver sustainable

regeneration and celebrate the Lee Valley waterways and open spaces.

- 13 A series of Guiding Principles (GP) form the main body of the SPD setting out detailed guidance under topic headings as follows:
- **Movement and Connectivity – GP 1** this seeks to ensure development is designed to support and enable people to engage in active travel with movement by foot and cycle prioritised over any other form of transport.
 - **Sustainable Places - GP 2. Carbon Reduction**, via low carbon energy supply, smart and efficient systems and **GP 3. Blue and Green Infrastructure Network** which includes guidance on biodiversity (including Biodiversity Net Gain) and nature recovery, delivering green networks and open space including Brooks Park, the Green Loop, Lee Navigation Linear Open Space and the blue network, please refer to Fig 4.3 attached at Appendix D to this report.
 - **Sustainable Construction Management - GP 4** the need for developers to implement construction logistic plans or Construction Environmental Management Plans, including Construction Traffic Management Plan.
 - **Achieving Mixed Uses** – guidance on the appropriate type location and mix of land uses in the SPD area. **GP 5. Housing and Design Quality**, **GP 6 Commercial Activity Areas**, and **GP 7 Delivering a New Town Centre**.
 - **Social Infrastructure - GP 8**, this includes guidance for a range of social and community infrastructure including for education, health, sport, leisure and culture.
 - **Managing Transitions GP 9** through buffering and overcoming conflict where development must consider the relationship between proposed and existing land uses.
 - **Tall Buildings – GP 10 Tall Building Definition and Height Strategy**. This defines the station hub as the location for tall buildings of up to 26 residential storeys (81m), and clusters of up to 22 residential storeys (69m) to mark key nodes and public spaces along the Spine Rd and adjacent to intersections with the waterways.
- 14 The SPD applies the above Guiding Principles to the key sites in the SPD area that do not currently have consent for major development, e.g. the Tesco and Ikea sites. Also included is the Ravenside Retail Park (Site 2) which lies adjacent to the River Lee Navigation - please refer to Fig 5.1 Key Sites at Appendix D to this report. Specific guidance is included for the boundary that this site shares with the Lee Navigation; it states "Activate the waterside setting, and incorporate elements of the green network, including the Green Loop and Lee Navigation Linear Open Space".
- 15 The final component of the draft SPD summarises the key infrastructure requirements for the SPD area and wider Meridian Water. Delivery of the Meridian Water Western Bank will require a wide range of infrastructure provision including, transport, utilities, schools and healthcare and

environmental infrastructure such as open space and flood alleviation. Strategic Infrastructure Works funded by the Governments Housing Infrastructure Fund at £170m are underway and will bring forward important environmental improvements of benefit to the Regional Park such as new open space works at Edmonton Marshes, flood alleviation, alterations (including naturalisation) to the Pymmes Brook channel, associated landscaping and formation of new public open space at Brooks Park, and a range of highway upgrades and east west connections, linking through from the new Meridian Water Station.

COMMENTS ON THE DRAFT SPD RELEVANT TO THE REGIONAL PARK

16 The Vision for Meridian Water as a highly sustainable mixed use community with new open spaces, improved and restored waterways is to be supported. More emphasis should be placed on the creation of Brooks Park and possible extension westwards onto the former Ikea site as this is an important area of public open space within the Western Bank. Its proximity to the Regional Park at Tottenham Marshes will offer valuable opportunities to provide for leisure, recreation and biodiversity on a meaningful scale.

17 The objectives for 'Connectivity', 'Sustainable Regeneration' and 'Celebrating the Lee Valley Waterways and Open Spaces' focus on the need to ensure MWWB connects to and enhances the Regional Park and this is welcome. However this focus needs to be widened to ensure equal weight is placed on creating new areas of open space within the SPD area and as part of the individual development plots, ensuring these can be retained as a sustainable resource over the long term.

18 Guiding Principles

Movement and Connectivity GP1

The detail provided under GP1 Movement and Connectivity is to be welcomed, in particular the emphasis on active travel. The Guidance seeks to ensure development proposals place the highest priority on walking and cycling and that development contributes to the improvement of the existing movement network including Leaside Road, connections under the North Circular and new links to the surrounding area. These connections are supported by PDF Area Proposals A.4.2 for Visitors and are important for the Regional Park. They will enable visitors to make the most of the nearby Meridian Water station and follow pedestrian and cycle routes through the MWWB onto the Navigation towpath and Edmonton Marshes. Further guidance should however be included in the SPD to support the creation of a safe and attractive gateway into the Regional Park from the eastern end of Leaside Road.

19 Sustainable Places – Blue and Green Infrastructure Network GP3

The content of Guiding Principle 3 can be supported. The emphasis on enhancing biodiversity and the blue and green infrastructure network is welcomed. The specific reference to the Lee Valley Biodiversity Action Plan is helpful as it should deliver habitat creation and native planting within MWWB that complements the adjoining Park areas. The prescription for development to achieve a 10% Biodiversity Net Gain (BNG) is endorsed and this should be the minimum sought through development given the likely low base on which this assessment will be calculated. Guidance should specify that the BNG will need to be provided on site within the MWWB.

20 Guidance also proposes that new spaces and habitats should be designed to

link up with existing green and blue assets and connect with existing Sites of Importance for Nature Conservation (SINCs) Guidance should be clear that this would include the River Lee Navigation Site of Metropolitan Importance for Nature Conservation (SMINC). Making landscape scale connections between MWWB and sites beyond its boundary is important. Careful design and management of open spaces and their habitats and biodiverse features will need to be provided as part of development to ensure the same spaces do not face unsustainable pressure from other uses such as recreation/leisure use, spill out areas for public activity relating to adjacent development, main access routes etc. that will undermine and devalue biodiversity.

- 21 Guidance for the Blue Network includes a requirement for development to reduce flood risk through sustainable and natural flood risk management and this is endorsed. The naturalisation and de-culverting of Pymmes Brook would be welcome although it is recognised this would require detailed feasibility work as stated in the SDP.
- 22 An additional Guidance Principle should be added to cover lighting, in particular to ensure sensitive lighting schemes are considered as an integral part of development and to ensure developments avoid light pollution. The need for lighting strategies and retention of dark areas and corridors is a matter often raised by the Authority in response to development proposals, particularly where development overlooks the waterways such as, in this case, the Lee Navigation. The 'Institute of Lighting Professionals (2018) Bats, and Artificial Lighting in the UK Guidance Note 08/18' should be used to inform development and lighting strategies.
- 23 **Tall Buildings GP 10**
Meridian Water is considered to be of sufficient size to establish its own character and in line with the ELAAP policy it is generally considered suitable for high density and taller development. Hence the guidance includes a 'Tall Building Definition and Height Strategy' for the MWWB under GP10 with two main guidance points, firstly to define the heights considered acceptable and secondly their locations. This height strategy proposes clusters of buildings of approximately 22 residential storeys (69m) to mark key nodes and public spaces along the central spine road and buildings of approximately 18 residential storeys (57m) in between to 'mark the route to the Lee Valley', please refer to Fig 4.7 Height Strategy attached as Appendix D to this report.
- 24 Whilst it is understood that tall buildings create local landmarks and can provide useful reference points such as marking entrance points to the Regional Park or public squares, the open and largely flat valley floor context of the Regional Park should be taken into account. The Authority's Landscape Strategy provides guidance in this respect and it is therefore recommended that a new bullet point 3 is added to GP10 to cover the requirement for building heights to step down where they are located adjacent to the Park and open space such as Brooks Park and also be lower adjacent to the River Lee Navigation. Views out across the site to the surrounding context and Park landscape is also important and should not be blocked by a wall of development.
- 25 **Infrastructure Delivery**

The SPD includes details (Table 6.1 in the SPD) and a progress update on the key strategic infrastructure requirements for Meridian Water as a whole, as set out in ELAAP. It should be noted that the Edmonton Marshes new public open

space, which will also act as flood compensation storage, is identified as due for completion by 2024/25.

- 26 The SPD also includes a wide range of more localised infrastructure which needs to be provided to deliver the ELAAP but is also required for the delivery of individual plots or development parcels. Such infrastructure is expected to be delivered directly by developers ('development costs') or through development. Included within this category (Table 6.2) are the Green and Blue Infrastructure elements referred to in the SPD Guiding Principles. For example the Green Loop which will include improved access to the Regional Park and is intended to deliver biodiversity and flood attenuation. It should be noted that the trigger for these elements will be development at Phase 2 sites – Ikea, Tesco and the Ravenside Retail Park. The Authority will need to be consulted on these elements to ensure they are complementary to the adjoining Park areas and their management and that they improve connectivity. Similarly new proposed pedestrian and cycle bridge crossings over the Lee Navigation and Pymmes Brook at Leaside will come forward alongside development of the key sites funded by the development.

ENVIRONMENTAL IMPLICATIONS

- 27 There are no environmental implications arising directly from the recommendations in this report but the draft Meridian Water Western Bank SPD once adopted will contain guidance material to planning decisions within the borough that could have an impact on the protection, enhancement, and development of the Regional Park.

FINANCIAL IMPLICATIONS

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

HUMAN RESOURCE IMPLICATIONS

- 29 There are no human resource implications arising directly from the recommendations in this report.

LEGAL IMPLICATIONS

- 30 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.
- 31 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

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

EQUALITY IMPLICATIONS

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

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BACKGROUND REPORTS

The London Borough of Enfield Meridian Water Western Bank - Supplementary Planning Document draft for public consultation Oct 2022

PREVIOUS COMMITTEE REPORTS

Regeneration & Planning Committee	RP/61/22	Consultation by the Borough of Enfield. Details of Reserved Matters (Scale, Layout, Access, External Appearance and Landscaping) for 274 Units in Respect of Plot Z02-01 Within Buildings from 10 to 16 Storeys in Height Pursuant to Condition 4 of Outline Planning Permission 19/02718/RE3 Dated 31 st March 2022 for Development of Phase 2 of Meridian Water Comprising Residential, Purpose Built Student Accommodation and/or Large Scale Purpose Built Shared Living; Hotel, Commercial Development; Retail, Social Infrastructure, a Primary School, Hard and Soft Landscaping, New Public Open Spaces Including Equipped Areas for Play, Sustainable Drainage Systems, Car Parking Provision, and Formation of New Pedestrian and Vehicular Access (All Matters Reserved). At: Meridian Water, Former Gas Holder Site, Leaside Road, London, N18 2HR.	22/09/22
Regeneration & Planning Committee	RP/33/22	Planning Consultation by the London Borough of Enfield on Two Applications for Strategic Infrastructure Works and an Outline Application for a Mixed Use Residential Led Development Both Relating to Meridian Water	19/09/19

APPENDICES ATTACHED

Appendix A	The Authority's draft response to the London Borough of Enfield
Appendix B	Plan showing the Meridian Water Western Bank area in relation to the Regional Park
Appendix C	Plan showing wider context of the Meridian Water Western Bank SPD area
Appendix D	Extracts from the draft SPD Figures 4.3, 5.1 and 4.7

LIST OF ABBREVIATIONS

SPD	Supplementary Planning Document
PDF	Park Development Framework
SSSI	Site of Special Scientific Interest
MWWB	Meridian Water Western Bank
NPPF	National Planning Policy Framework
ELAAP	Edmonton Leaside Area Action Plan
SIL	Strategic Industrial Location
SIW	Strategic Infrastructure Works
SMINC	Site of Metropolitan Importance for Nature Conservation
SPA	Special Protection Area
GP	Guiding Principals
BNG	Biodiversity Net Gain
SINC	Site of Importance for Nature Conservation

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15th December 2022

Dear Helen

RE: CONSULTATION ON THE DRAFT MERIDIAN WATER WESTERN BANK SUPPLEMENTARY PLANNING DOCUMENT - LEE VALLEY REGIONAL PARK AUTHORITY COMMENTS

Thank you for consulting the Regional Park Authority on the draft Meridian Water Western Bank SPD. The Authority welcomes the opportunity to comment on further planning guidance for this important regeneration area given its relationship to the Regional Park.

A report on this matter was considered by the Authority's Members at the Lee Valley Regeneration and Planning Committee on the 15 December 2022 when the following comments were agreed.

Draft SPD Vision and Objectives

The Authority supports the Vision concept for the Meridian Water Western Bank as a highly sustainable mixed use community. The emphasis placed on "improved and restored waterways and new open space" within the Western Bank to "knit this new community" into the Regional Park will be important to ensure sufficient space of good quality and variety is provided to meet the needs of new residents and employees. The Vision statement should make reference to the creation of Brooks Park and indeed its possible extension westwards within the former Ikea site. Its waterside location and proximity to the Regional Park at Tottenham Marshes offers significant opportunities for leisure and recreation on a meaningful scale.

The open spaces within the Regional Park are under increasing recreational pressure from new users or visitors due to the level of growth planned or currently being developed along its boundaries. It is fundamental to the quality of the new communities such as MWWB, and the wider environment benefits of the Regional Park that new development and co-ordinated regeneration of areas such as Meridian

Water create spaces for people's enjoyment, leisure and well-being from the outset as an integral part of the areas transformation.

The objectives highlight the need for the MWWB to connect to and celebrate the Lee Valley Regional Park, and to enhance blue/green networks, and this is welcomed. But equally more detail is required as to how the MWWB will create and embrace new areas of public open green space within its own site boundary, and how these will be safeguarded and managed as a sustainable resource for the long term.

Objective 4 which is focused on delivering sustainable regeneration starts to address this where it identifies the need to "Ensure an uplift in biodiversity across the site through the provision of new multifunctional green spaces linking to existing green networks, and naturalisation and restoration of watercourses". Substantial areas will need to be provided within the MWWB to provide sufficient room for both biodiversity and recreational/leisure needs. Connecting this 'scale' of resource with the Regional Park's spaces and habitats will contribute positively to placemaking at MWWB extending the Park into the Western Bank.

Guiding Principles

Movement and Connectivity

The emphasis on active travel is supported. The design of development proposals should place the highest priority on walking and cycling particularly within the street network, public realm and open spaces. However there is also a need to integrate and connect the Western Bank with its surroundings and this should include the Regional Park. The SPD guidance identifies the new links needed to connect with the surrounding area including foot and cycle links over the railway in the west, from Main Street which runs through the centre of the Western Bank site and via bridges (for cyclists, buses and pedestrians) over the Lee Navigation, Pymmes and Salmons Brooks.

Connections from Main Street, the central route from the station through to the rest of Meridian Water are welcome – they will enable people to access Edmonton Marshes in the Park and move onto the Lee Navigation towpath to travel north and south further into the Park, connecting with key venues such as the Lee Valley Leisure Complex at Pickett's Lock and Walthamstow Wetlands. Supporting text references the importance of bridge crossings as high quality placemaking features sympathetic to the waterways beneath especially where these form part of the canal edge or towpath. This detail should form part of the formal guidance under GP1 – the Navigation and its towpath form part of the Regional Park in Enfield and the SPD shows at least 3 crossings over the Navigation; Guidance should consider the cumulative impact of these crossings particularly in terms of their visual and ecological impact on the waterway corridor.

The SPD also needs to address links south onto Tottenham Marshes. This would need to come forward as part of the improvements to Leaside Road, a key east west connecting route along the southern boundary of the Western Bank identified under the guidance to be enhanced as part of development.

Leaside Road is an important point of access into Tottenham Marshes via the existing Leaside footbridge and the future of this connection remains unclear. This matter was raised in the Authority's response to the reserved matters application for residential led redevelopment of the former Gasholder Site off Leaside Road, Plot Z02-01 of Phase 2 (our ref: RP/61/22). The SPD should support the creation of a

safe and attractive gateway or access point into the Regional Park at this point and provide guidance to secure this improvement as part of development and infrastructure proposals linked to the public realm interventions.

Sustainable Places – Blue Green Infrastructure Network

The content of Guiding Principle 3 Blue and Green Infrastructure Network is supported. The emphasis on enhancing biodiversity and maximising opportunities for nature recovery is welcomed and reference to the Lee Valley Biodiversity Action Plan is helpful as the Authority would wish to see habitat creation and native planting within MWWB that complements the adjoining Park areas. The Authority supports the Council in seeking to achieve a 10% Biodiversity Net Gain and would encourage this to be the minimum sought through development given the likely low base from which this assessment will be calculated. Guidance should specify that the BNG will need to be provided on site within the MWWB.

Guidance also proposes that new spaces and habitats should be designed to link up with existing green and blue assets and connect with existing Sites of Importance for Nature Conservation (SINCs). In principle this is supported, although Guidance should be clear that this would include the River Lee Navigation Site of Metropolitan Importance for Nature Conservation (SMINC). The Authority's PDF Biodiversity Area Proposals 4.A.2 highlight the importance of habitat creation to strengthen ecological connectivity between the reservoir Site of Special Scientific Interest, i.e. William Girling in the north and the waterway and open grassland habitat on Tottenham Marshes. Proposals also seek to ensure that "New waterside space proposed alongside the River Lee Navigation in the Meridian Water Masterplan should include appropriate waterside habitat creation to aid establishment of an ecological corridor"

Making these landscape scale connections between MWWB and sites beyond its boundary is important but this will require careful design and management of habitats and biodiverse features provided as part of development to ensure the same spaces do not face unsustainable pressure from recreation/leisure use that devalues biodiversity.

The waterway corridors and associated waterside open space within MWWB are an example. Guidance identifies these features as part of the Green Loop, a continuous linear park with an optimum width of 20 to 30 metres which loops through the heart of Meridian Water providing open space, pedestrian footway and two way cycle route and other amenities. The design and long term management of this feature will require careful consideration to ensure a biodiversity function can succeed. Proposals for the extension of the Lee Navigation linear open space as a north south movement corridor for people and spill out area for public activity relating to adjacent development and creation of a new public 'Riverside Square' part of the proposed Town Centre, is also unlikely to offer much biodiversity value in the long term. Guidance needs to be clear as to the primary role of the waterways and how the various demands can be balanced.

The requirement for development to reduce flood risk through sustainable and natural flood risk management is supported. The naturalisation and de-culverting of Pymmes Brook would be welcome, although as stated in the SPD this would require detailed feasibility work. It is understood that as part of the creation of Brooks Park a section of Pymmes Brook will be naturalised and this is identified as a project within the Infrastructure Delivery Plan included in the SPD. The Authority's previous comments on this proposal (in its response to the Gas Holder application) sought the inclusion of channel softening alongside the development's boundary with Pymmes

Brook. It was suggested that floating reedbeds and Sand Martin nest holes might be incorporated as part of these softening works. It is understood that proposals for channel softening are being discussed with the EA.

Lighting

Guidance needs to be included on lighting, and an additional Guidance Principle should be added, in particular to ensure sensitive lighting schemes are considered as an integral part of development and to ensure developments avoid light pollution.

This will be of particular relevance where development overlooks the waterways such as the Lee Navigation and open spaces such as Brooks Park and Tottenham Marshes, and where maintaining dark corridors and spaces are important for biodiversity. The 'Institute of Lighting Professionals (2018) Bats, and Artificial Lighting in the UK Guidance Note 08/18' should be used to inform development and lighting strategies.

Lighting is a matter that should also be covered in guidance relating to Sustainable Construction Management under GP 4. Construction Environmental Management Plans will be an important mechanism for minimising disturbance within the adjoining areas of the Park, particularly given that development within the Western Bank will be phased over a lengthy period of time.

Social Infrastructure

Reference under GP 8 'Social Infrastructure Provision' to the provision of flexible indoor and outdoor sports and leisure facilities is noted. Guidance should make reference to the facilities within the adjoining areas of the Regional Park, such as the Athletics Centre at Pickett's Lock and future sports and recreational provision on Edmonton Marshes. Complementary provision and programmes should be encouraged.

Tall Buildings

The guidance on tall building should allow for a considerable reduction in height where buildings are positioned adjacent or close to the Regional Park, in particular Tottenham Marshes in the south and alongside the River Lee Navigation in the east. The Authority's Landscape Strategy and proposals seek the restoration of poor quality and fragmented landscape character, protecting and enhancing the openness of the valley floor to the north and south of the North Circular. In respect of Tottenham Marshes (Landscape Character Area (LCA) C2) the Landscape Strategy notes "Where tall buildings begin to intrude on views and diminish the sense of scale and openness that the marshland has, this affects the sense of the area as a semi-natural space, removed from and providing a break between busy urban areas that abut it". The strategy states that areas where open skylines predominate should be protected.

The Lee Navigation falls within LCA F1 'Peri-urban Valley Floor'. Strategy Guidelines state "Ensure any future development protects existing valued features and enhances the landscape framework across the area - it should demonstrate careful design that integrates development physically, visually and functionally into the wider LVRP landscape".

An additional guidance point 3 should be added under GP10 to reflect the above Strategy – the following wording is suggested for consideration:

Guiding principle 10 Tall Building definition and height strategy

3. The height of buildings positioned close to the Regional Park should step down towards the Park in particular the open spaces at Tottenham Marshes and alongside the River Lee Navigation respecting and announcing the transition to areas of open space and the waterside environment, enabling views out across the Lee Valley to be retained and enhanced.

High Level Guidance for Key Sites

A number of the points raised above will be relevant to future development within the Ravenside Retail Park area, identified as a key site within the SPD and located adjacent to the River Lee Navigation. The specific 'high level' guidance currently included references the need to:

- "Activate the waterside setting, and incorporate elements of the green network, including the Green Loop and Lee Navigation Linear Open Space"

This guidance is supported but the level of activation will need to consider the location of the site adjacent to the River Lee Navigation and balance other requirements such as provision for biodiversity, sensitive lighting, and safe routes for people as part of the Green Loop.

Infrastructure Delivery

The wide range of infrastructure identified in the SPD is noted and the detail of the site related infrastructure requirements is helpful in understanding the level of detail still to come in terms of securing green and blue infrastructure, bridge links and pedestrian and cycle routes that will connect the Meridian Water Western Bank with the Regional Park and deliver substantial new public open space within the Park's boundaries.

The Authority should be consulted on these elements to ensure new green networks and open spaces are complementary to the Park's open spaces and recreational offer. The detail of physical links, pathways and cycle routes between MWWB and the Park need to be agreed with the Authority to ensure a co-ordinated access and wayfinding strategy for the whole SDP area. This is important if funding and delivery is likely to be triggered by the development on a plot by plot basis and secured via developer contributions (S106 or Community Infrastructure Levy) or direct provision by developers.

Included within the site related infrastructure category are the Green and Blue Infrastructure elements referred to in the SPD Guiding Principle 3, such as the Green Loop which will include improved access to the Regional Park and is intended to deliver biodiversity and flood attenuation. The trigger for these elements will be development on Phase 2 sites – Ikea, Tesco and the Ravenside Retail Park and the Authority should be involved in the detail of these infrastructure elements as early as possible in the development process to ensure they are complementary to the adjoining Park areas and improve connectivity and biodiversity. A similar course of action is required for the proposed pedestrian and cycle bridge crossings over the Lee Navigation and Pymmes Brook at Leaside.

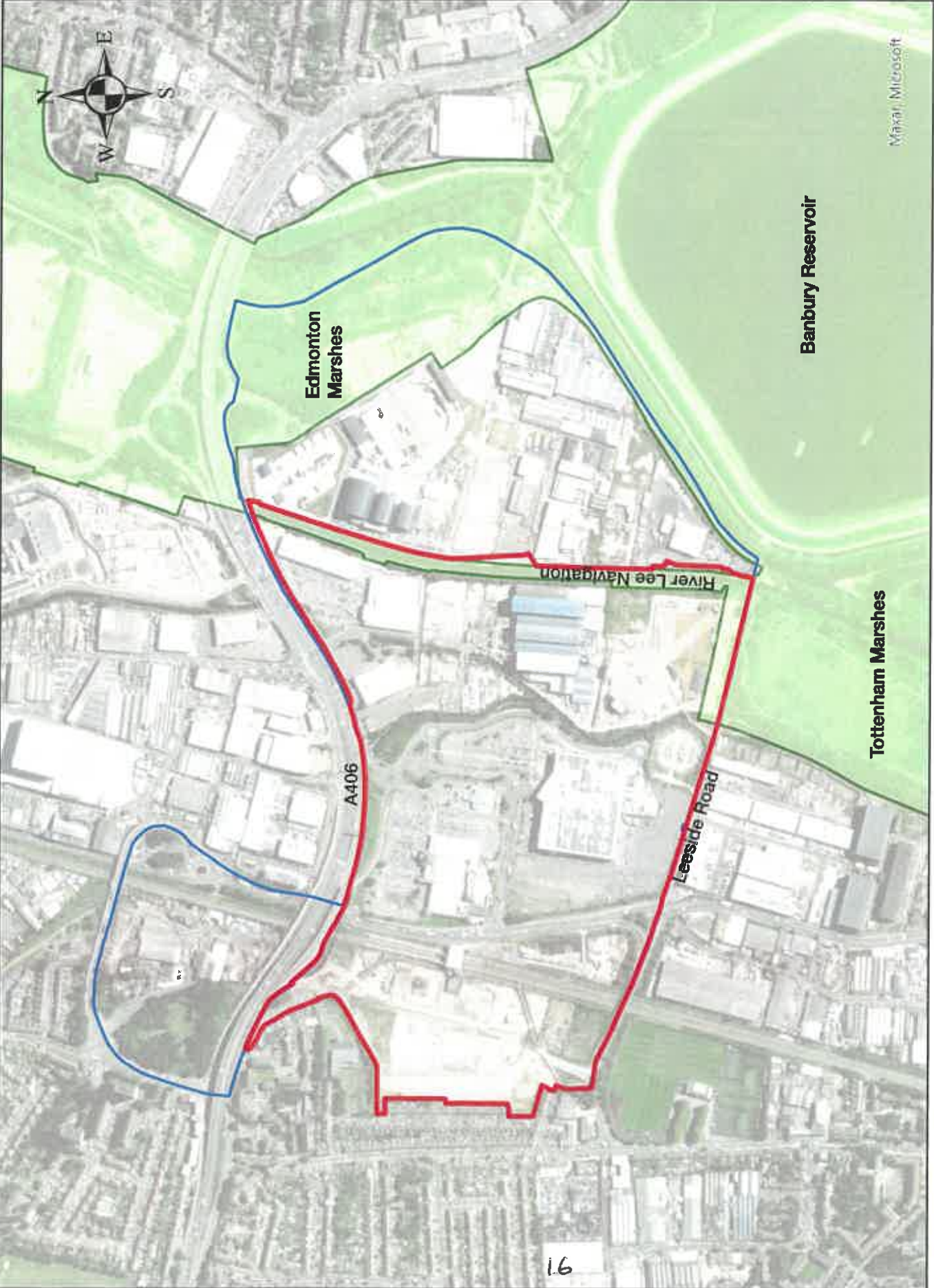
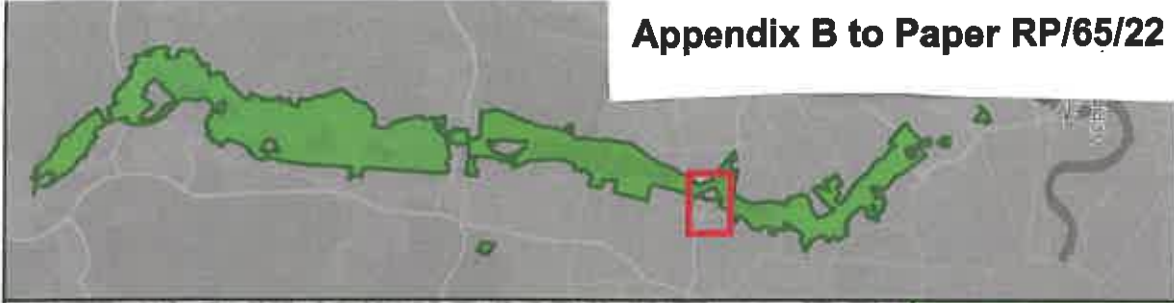
The Authority would welcome further discussion on these matters particularly as the detail of some infrastructure designs and works are progressing and would welcome

the opportunity to engage further on the detail of guidance contained within the SPD as it is amended following this consultation.

Yours sincerely

Claire Martin
Head of Planning

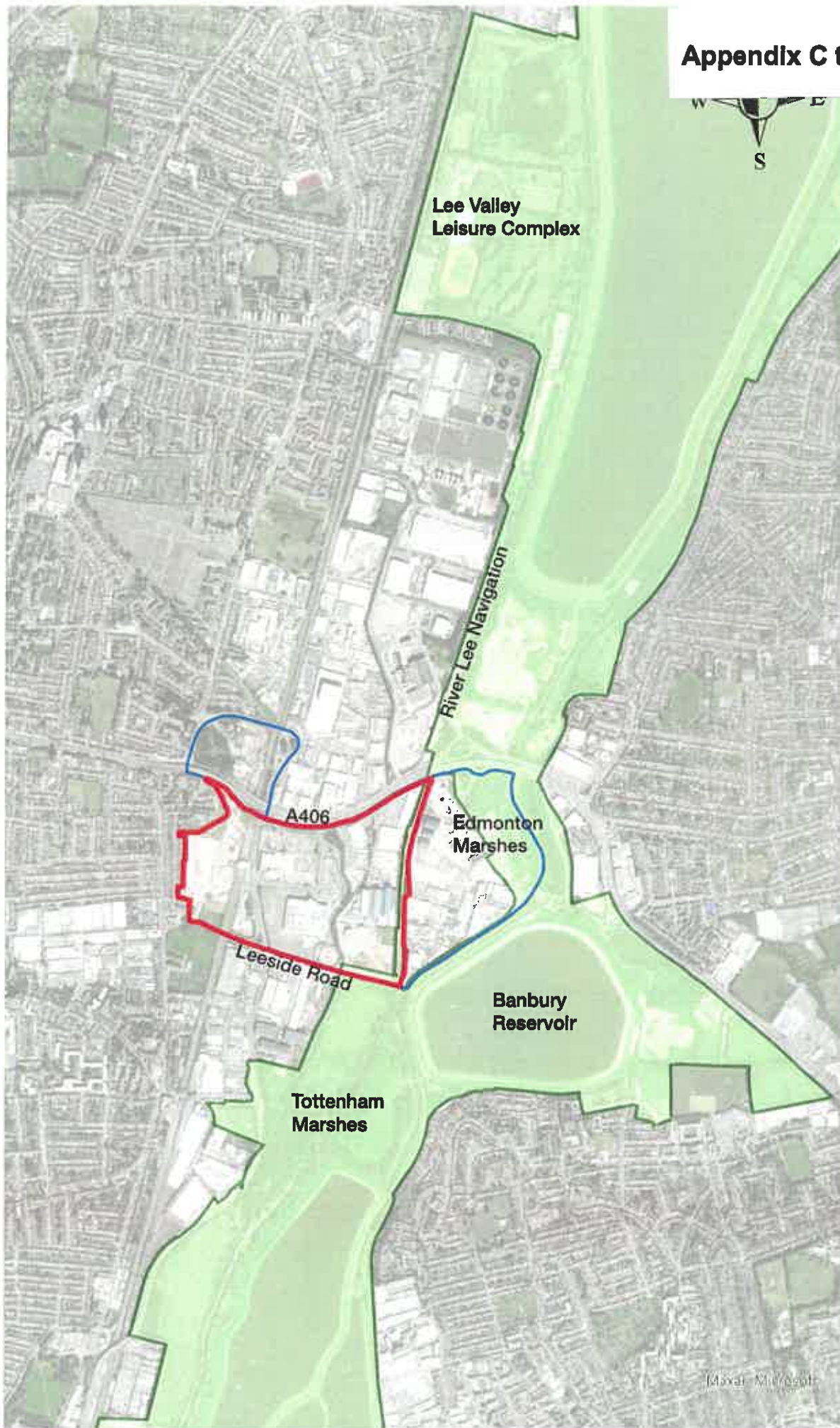
Appendix B to Paper RP/65/22



Meridian Water Western Bank area

Scale: 1:8,000
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- Meridian Water Western Bank area
- Meridian Water site
- Park Boundary

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Appendix D Extracts from the draft SPD

Extract from draft SPD Fig 4.3 Blue and Green Network



-  The Green Loop (indicative route)
-  Green connections
-  Extension of Lee Navigation Linear Open Space
-  New park (indicative area)
-  Naturalisation of brooks
-  Culverted brook
-  Pedestrian and cycle bridges
-  Indicative civic spaces with a mix of hard landscape and planting

Extract from draft SPD Figure 5.1 Key Sites










- 1 IKEA
- 2 Ravenside Retail Park
- 3 Tesco
- 4 Teardrop
- 5 MW Phase 1
- 6 MW Phase 2

Extract from draft SPD Fig 4.7 Height Strategy



Key

-  Spine road (indicative location)
-  Angel Edmonton Road
-  New bridge (indicative location)
-  New civic space /activity hub (indicative location)
-  New park (indicative)
-  61m Tall building cluster (with maximum height indicated)
-  57m Tall buildings permitted along route