

Response to Inspector's Second Questions for and on Behalf of the London Borough of Enfield

	Question to:	Question:	Response:
2Q 1.6	London Borough of Enfield (LBE)	The LIR from LBE (REP3-003) is an appraisal of the application against the National Planning Policy Framework. Is there any further advice in terms of this application the Council wishes to offer when assessed against National Policy Statements EN 1 and EN 3?	<p>The Council considers that the material considerations outlined by the NPPF and the NPS EN1 and EN3 thematically are very similar. The Council would wish to point out the emphasis the Statements provide on good design, landscape and green belt sensitivities, flood risk and the advocacy for CHP plant to serve Decentralised Energy Networks. The LPA consider that all of our comments when assessed against EN1 and EN3 remain applicable and consistent with these documents and the LPA respectfully requests that these representations should be taken as material considerations in the ExA's assessment.</p> <p>In examining elements of our representations in greater detail, Section 10(3)(b) of the Planning Act 2008 requires the Secretary of State to have regard, in designating an NPS, to the desirability of good design. Section 4.5 of EN-1 sets out the principles of good design that should be applied to all energy infrastructure. Given the importance which the Planning Act 2008, the NPPF and the Local Plan places on good design and sustainability, it is considered that the representations made by the LPA in respect of the design of the ERF, the use of materials with high visual quality, the need to use a wider range of materials and soft landscaping measures to the former EfW site and indeed our</p>

			<p>objection to the provision of a viewing platform are valid and should be robustly addressed through a revised Design Code, amended requirements and the removal or relocation of viewing platform.</p> <p>Consistent with EN1 the ExA needs to be satisfied that energy infrastructure developments are sustainable and, having regard to regulatory and other constraints, are as attractive, durable and adaptable as they can be. The ExA must be satisfied that the applicant has taken into account both functionality and aesthetics as far as possible. It is acknowledged that the design ethos adopted for the ERF has sought to minimise its overall size and indeed that the nature of much energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area, however, this elevates the importance of the visual quality of the materials selection and in providing a viewing platform to the more sensitive eastern elevation it is considered that its presence directly contravenes a design approach that has sought to demonstrate good design in terms of siting and size relative to the more sensitive eastern corridor.</p> <p>The viewing platform is not required for the functioning of the ERF and its removal cannot be resisted for operational reasons particularly where it is considered that the platform is harmful to visual amenity in the wider surround.</p> <p>In terms of the former EfW site, EN1 states that adverse landscape and visual effects may be</p>
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			<p>minimised through appropriate siting of infrastructure within that site, design including colours and materials, and landscaping schemes, depending on the size and type of the proposed project. The LPA consider that a wider palette of surfacing materials including soft landscaping options to the EfW site will achieve the objectives of EN1.</p> <p>EN1 is very clear in its support for the provision and off-take of heat for larger heat networks. The Lee Valley Heat Network serving the redevelopment at Meridian Water is a known Council project supported by the Local Plan and the subject of a wider masterplan and emerging AAP. The contribution of the Ecopark to facilitating this network is significant and accordingly it is considered that significant weighting should be afforded to securing connection and heat supply from the EFW as part of this DCO application.</p>
2Q 3.1	LBE	Please confirm what constitutes the statutory development plan applicable to this application.	<p>The statutory development plan comprises:</p> <ul style="list-style-type: none"> • The London Plan (MALP 2015) • The Core Strategy (adopted 2010) • The Development Management Document (adopted 2014) • The s106 SPD (adopted 2011)
2Q 4.1	LBE	In view of the observations in paragraphs 5.2 and 5.4 of the Council's written representations (REP2-012) about the sensitivity of land along the eastern boundary of the EcoPark within the Metropolitan Green Belt to inappropriate development, does LBE accept the	The LPA considers that the proposed temporary laydown area is an inappropriate use within the green belt. However, this given, the use of the land to facilitate delivery of the ERF and wider works covered by the DCO constitutes exceptional

		<p>proposed use of the site for the temporary laydown area for the expected construction period regardless of the nature of proposals for reinstatement?</p>	<p>circumstances only where the use of the land is temporary (to cover the construction period) and the land is appropriately and positively reinstated consistent with the provisions of NPS EN1 that seek to exploit opportunities for building-in beneficial biodiversity or geological features as part of good design and where this aligns with the use of the area for flood alleviation. A permanent use of this area would not be supported, would be inappropriate and would be contrary to the provisions of the NPPF and the Local Plan.</p>
2Q 7.1	LBE, Thames Water Utilities Ltd (TWUL)	<p>The indicative construction programme (paragraph 3.5.6 et seq, APP-039, Doc AD06.02) shows that the temporary laydown area will be required between approximately 2019 and 2026, with the provision for restoration of the site up to two years after that. When is the Meridian Water development anticipated to use this land for compensatory flood storage and is this use agreed yet with TWUL?</p>	<p>It is unlikely that this potential compensation area would have a significant benefit for Zone 1 of Meridian Water.</p> <p>Zone 1 is programmed for construction between 2016 and 2023, assuming that house building starts in 2017 and approximately 300 units are released per year from 2018.</p> <p>However, future Zones to the east of the railway could potentially start construction in 2024. This could be earlier depending on market conditions and the Master developers strategy. It is these areas to the east which would benefit by the creation of the potential fluvial compensation area. The area therefore would be required in or around 2026.</p> <p>This future use is yet to be agreed with TWUL, however, its reinstatement and enhancement are supported by the provisions of EN1. The land is designated as Metropolitan Green Belt.</p>
2Q 7.2	LBE	<p>Are there any current planning permissions relating to</p>	<p>There are no current planning permissions relating to</p>

		the land identified for the temporary laydown area?	the land. The land is designated as Green Belt.
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