Document reference **EXD105** is email correspondence between the Council and the Inspector over the period 13th December 2018 – 9th January 2019

**On 13th December 2018 the Inspector wrote to the Council:**

Thank you for the informal update regarding the January submission date. I would be grateful if you could provide me with an indication of which part of the interim findings letter will be addressed by which date, and the factors that are leading to the anticipated delays.

As you will be aware, I am unable to produce a report until the matters identified in the Interim Findings letter are addressed. Planning Practice Guidance advises that Plans should be produced in a timely manner. I am therefore very concerned about the prospect of the AAP examination being prolonged to an unnecessary degree by the lengthy delays the Council are anticipating.

Lengthy delays may lead to potential problems where other evidence becomes out of date. They can also leave the plan vulnerable to intervening changes to policy and other circumstances whilst the plan is being prepared and as such, could compromise the effectiveness of the plan. Delays also require additional work from all parties, with a resulting cost implication for the Council. The Council should therefore consider whether a protracted AAP examination is the most effective strategy for achieving the Council’s vision for the area,

I look forward to a response by Weds 19th of December.

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**On 19th December 2018 the Council responded to the Inspector:**

Enfield Council thank you for your Interim Letter and your comments on the Schedule of proposed Modification provided to us on 21 November 2018. These
will greatly aid us in ensuring that the Edmonton Leeside Area Action Plan (ELAAP) is sound.

In line with your comments and discussions with other stakeholders the Council has decided that, in order to ensure that the ELAAP is soundly underpinned by the adopted Core Strategy, the AAP will support 5,000 dwellings at Meridian Water and no SIL release.

The Council recognises that delivery of more than 5,000 units to take Meridian Water to a capacity of 10,000 homes, as well as the matter of SIL, need to be assessed and evidenced more strategically and have concluded that this would be best achieved through Enfield’s Local Plan production process. The Council’s Regulation 18 Local Plan document is currently out for public consultation.

The ELAAP, as well as the upcoming Meridian Water Masterplan, will therefore cover only residential development of 5,000 units on non-SIL land. The Central Spine Road corridor will remain unchanged from the version submitted to you in modifications following the EiP, as delivery of this key piece of infrastructure is still crucial to enabling the successful operation of the area, including 5,000 residential units, ongoing industrial operations on SIL land and improvements to connectivity and legibility and the functioning of the wider area.

The Council have contacted all of their relevant consultants who will be involved in preparing the pieces of evidence that your letter states are required to resolve outstanding matters of soundness. Our consultants have scoped the amount of work required, as well as the relevant interdependencies between different matters. The work required to make relevant changes to the AAP, as well as to address the majority of your concerns can be completed by March 2019.

The only two pieces of evidence which will not be possible to complete in this timescale are the full strategic transport and flood models. This is due to the run time of the models, the need to calibrate and subsequently validate the models, and the level of detail required. On matters of transport and flooding we will therefore only be able to provide you with answers to your questions based on the evidence of the adopted Core Strategy and modelling work completed to date, as presented at the EiP.

The transport and flood modelling to date do not assess the detail around the site or the link road. The existing flood model also does not take into account current climate change allowances.
Therefore the Council will still proceed with calibrated and validated strategic transport and flood models to run all of the relevant scenarios and fully assess impacts and measures required to address these. These will not be completed until July.

As the AAP is now fully consistent with the residential capacity and SIL situation of the adopted Core Strategy and London Plan and its position on transport and flooding to support 5,000 residential units, we hope that this will provide you with sufficient comfort, without the need to wait for the results of the full strategic transport and flood modelling.

If you are confident that the plan can be made sound on this basis, the Council will aim to respond to the matters you have raised by March 2019. If you believe that the plan can only be made sound on the basis of the full level of detail on transport and flooding from completed strategic modelling work, the Council will have to delay submitting further information to you until July 2019.

On 20th December 2018 the Inspector asked:

Can the Council clarify:

1. Is still the Council’s intention to intensify employment uses on the other sites identified during the hearings?

2. What is the proposed employment figure for Meridian Water? Is this in line with the adopted Core Strategy? (1,500 jobs)

Inspector’s letter to the Council 20th December is document reference EXD 106
On 9th January 2019 the Council responded:

Thank you for your e-mail asking two questions regarding the proposed employment strategy of the ELAAP.

Regarding your first question: Is it still the Council’s intention to intensify employment uses on the other sites identified during the hearings?

The Council’s intention is that intensification, modernisation and renewal of employment uses within the ELAAP boundary will take place as opportunities arise through planning applications and will be supported in line with adopted Core Strategy and London Plan policies. The Council is not intending, as part of ELAAP, to provide additional evidence to support more extensive industrial intensification on specific sites. In line with Core Policy 37, the aim is to strengthen the role of those existing industrial estates in active and beneficial employment use and extend their employment offer to support new and emerging businesses in sectors that are projected to expand in the long-term.

Regarding the mixed-use area of Meridian Water, again in line with Core Strategy Policies 37 and 38, it is intended that approximately 20% of the area will be dedicated to revitalised employment uses integrated into the wider development. It is the intention that many of these employment uses would be similar to those also accommodated on LSIS land.

Regarding your second question: What is the proposed employment figure for Meridian Water? Is this in line with the adopted Core Strategy? (1,500 jobs)

The Council’s intention is that, in line with the adopted Core Strategy, 1,500 jobs will be supported as part of Meridian Water.

This employment strategy and the Council’s new position on SIL is furthermore supported by the GLA, which will be expressed in a new Statement of Common Ground.

Finally, the Council has one more question of clarification on the subject of retail:

In your comments regarding Retail Provisions on page 8 of your Interim Letter dated 12 November 2018, in the final sentence you state that the Council should set a ‘local floorspace threshold for a sequential test’. Can you please confirm whether this should in fact say ‘impact test’?

We look forward to your response.

On 11th January the Inspector responded:

In response to the Council’s email, can you let them know that the comments on retail provision should read “The Council should modify the policy to include setting a local floorspace threshold for an impact test which takes account of the status of Meridian Water as a large local centre.”