

Date: 13 September 2021

Draft Enfield Local Plan 2019-2039

Thank you for consulting us on the document 'Enfield Local Plan Main issues and preferred approaches June 2021'. We responded previously to the earlier Regulation 18 consultation undertaken by Enfield Council in 2019. We understand that this revised plan builds on the information originally submitted and that you are seeking comment to help refine a draft strategy and associated policies. We are glad to see that our earlier concerns have been addressed through this new iteration and have some comments below that we hope that you find useful. However if you have any issues or queries please don't hesitate to contact us.

Environment Agency position

Our aim is to assist you prepare and implement a sound, robust, and effective plan that is reflective of national policy and your local evidence base. We hope that this collaborative process leads to a plan that delivers sustainable development, contributes to a stronger economy, and safeguards the environment for future generations.

Flood risk

Overall in terms of flood risk this submission is very encouraging and we consider it to have some strong flood risk policies. There is work to be done on the place-based strategic policies, relating to those sites being allocated which are partially in flood plains, as these must be informed by the Level 2 SFRA and include any site-specific flood risk recommendations (following demonstration that the Sequential Test has been passed).

Pg. 20, Strategic Objective 10

This objective currently makes reference to sustainably managing flood risk, but it would be useful if there could be specific mention of developments making the most of opportunities to reduce flood risk elsewhere.

Pg. 88, Strategic Policy SP SE1

Responding to the climate emergency, point 7

Currently it says '*reduce flood risk (including through the use of Sustainable Drainage Systems), improve wastewater infrastructure in line with the Council's Infrastructure Delivery Plan*)' We support the intention of this policy, but it would be useful for there to

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be a reference to reducing all sources of flood risk, as this is very specific to surface water/drainage.

Pg. 99, Policy DM SE8: Managing flood risk, point 2

We would also like to be mentioned when it comes to early engagement – resource allowing we encourage applicants in flood zones to approach us for pre-application work to ensure the application will be acceptable.

Pg. 100, Policy DM SE8: Managing flood risk, point 6

'Developments in proximity to culverts and watercourses must have a minimum of 8 metre set back (unless otherwise agreed with the Environment Agency, LLFA, Thames Water and the Canal and River Trust) with a means to facilitate river naturalisation, ecological enhancements and de-culverting, which improves maintenance of land drainage, enhances local amenity and improves the ecological function of river corridors'.

We strongly support the inclusion of this policy and are very pleased to see that Enfield are asking 8 meters setback as a minimum.

Pg. 100, paragraph 4.8.5

'Developments must prepare a site-specific FRA in line with the guidance set out in the SFRA. In some cases, developments that are located in flood zone 1 may be subject to the 1 in 100 year plus climate change flood extent. The assessment of flood risk should also include the risk of blockages in culverts and overland flow routes'.

While it is very encouraging that Enfield have identified instances where there may need to be greater consideration of flood risk for certain sites in Flood Zone 1, it is not clear whether it would be ourselves or the Lead Local Flood Authority picking up on any consultations in these instances. Our ability to do this work may not be possible given it may go beyond what we are resourced for.

Pg. 101, paragraph 4.8.8

It would be useful if this paragraph clarified whether developments that only offered safe refuge only would ever be acceptable? There is further mention of safe access / refuge in paragraph 4.8.12, so it would be useful if all this information could be pulled together to avoid confusion.

Could this paragraph also include discouraging the use of stilts / voids as a means of flood storage compensation?

**Pg. 102, Policy DM SE9: Protection and improvement of watercourses
& Pg. 126 Policy DM BG7: Watercourses**

The previous mention of a minimum 8m setback within Policy SE8 would be useful to reiterate/reference here to avoid confusion.

Protecting nature

We are very pleased to see our earlier concerns have all been addressed in this submission and that net gain is now a requirement for all new developments.

Pg. 118, paragraph 6.2.5

"Where a designated site or priority species/habitat is likely to be adversely affected, an ecological assessment will be required as part of the planning application."

This is supported, however, all developments should be expected to provide an ecological assessment, ensuring an ecological baseline is created, from which it can be ensured biodiversity is conserved and enhanced.

Groundwater protection

P. 103, Policy SE10 – SuDS

Whilst it is good to see consideration of site condition and appropriateness for SuDS, the discussion of SuDS solutions at potentially contaminated sites should be expanded (or explanation provided) to discuss the potential need for an Environmental Permit for discharges of surface water run-off. Chapter G of the Environment Agency's [Approach to Groundwater Protection](#) notes;

“Discharges of surface water run-off to ground at sites affected by land contamination, or from sites used for the storage of potential pollutants are likely to require an environmental permit.

This applies especially to sites where storage, handling or use of hazardous substances occurs (for example, garage forecourts, coach and lorry parks/turning areas and metal recycling/vehicle dismantling facilities). These sites will need to be subject to risk assessment with acceptable effluent treatment provided. “

P.133, Policy BG10 Burial and crematorium spaces

It would be helpful if this section could promote relevant guidance, particularly Section L (cemetery developments) of the Environment Agency's [Approach to Groundwater Protection](#), and [Cemeteries and burials: groundwater risk assessments](#)

P. 298, Water pollution paragraph 14.1.14

For ease of access the link provided in this section should be updated to the specific Environment Agency Source Protection Zone (SPZ) guidance page (<http://apps.environment-agency.gov.uk/wiyby/37833.aspx>), which provides an overview of SPZs and links to relevant maps and data.

Policies should require developers to avoid potential dewatering activities being located in the most sensitive locations (i.e. SPZs) from a groundwater protection viewpoint. Policies should steer high risk developments away from SPZ1. This includes proposals that have the potential to release hazardous substances to ground, involve effluent discharge or will physically disturb an aquifer (E.g. Petrol filling stations in SPZ1).

P. 298, Contaminated Land

It would be helpful if this section could link to and promote relevant guidance such the Environment Agency's [Approach to Groundwater Protection](#) and [Land Contamination Risk Management \(LCRM\)](#).

The [Approach to Groundwater Protection](#) should be considered with regard to development proposals that we would object to in principle (E.g. petrol filling stations and non-inert landfills within SPZ1)

P. 299, Waste and hazardous installations

This section should recognise that new waste activities and installations will require an [Environmental Permit](#).

Site allocations

The following information in regard to groundwater protection relates to the following sites.

Source Protection Zone 1 (SPZ1)

The following sites fall within SPZ1:

SA1 St Anne's Catholic High School for Girls
SA4 Enfield Town Station and the Former Enfield Arms SA6 Tesco, Southbury Road
SA19 IKEA store; Tesco Extra, 1 Glover Drive; Meridian Water Willoughby Lane And Meridian Way
SA32 Sainsburys Green Lanes
SA39 Travis Perkins Palmers Green, Bridge Drive, Broomfield Lane
SA42 Fords Grove Car Park
SA43 Lodge Drive Car Park (incl. Depot), Palmers Green
SA44 Land opposite Enfield Crematorium (known as The Dell). Great Cambridge Road
SA47 Ravenside Retail Park
SA51 Montagu Industrial Estate
SA52 Land West of Rammey Marsh
SA53 Car Park Site, Wharf Road
SA55 Land to the North West of Innova Park
SA59 Firs Farm Recreation Ground (Part)

Sites within SPZ1 are particularly sensitive with respect to groundwater, and additional constraints will be placed on the above development proposals. With respect to the Environment Agency's [Approach to Groundwater Protection](#), the following chapters would apply to these sites:

D1-General principles-all storage facilities
D2-Underground Storage (and associated pipework)
D3-Subwater table storage
G2- Sewage Effluent Discharges within SPZ1
G4- Trade effluent and other discharges within SPZ1
G8-Sewage pipework
G13- Sustainable Drainage systems
N7- Hydrogeological risk assessment
N8-Physical disturbance of aquifers in SPZ1

Please note that we would recommend planning conditions for any piled foundation proposals at these sites. The use of piled foundations would require a robust supporting Foundation Works Risk Assessment demonstrating that they are appropriate at the particular location and would not result in a deterioration of groundwater quality. Without such a risk assessment we would object to the use of piled foundations at these sites.

Potable groundwater abstractions

For sites in close proximity to potable groundwater abstractions we would strongly advise that the abstraction licence holder are also consulted with respect to piled foundation proposals. We note the following sites are within a 250m radius of a potable groundwater abstraction:

SA1 St Anne's Catholic High School for Girls

SA4 Enfield Town Station and the Former Enfield Arms
SA6 Tesco, Southbury Road
SA32 Sainsburys Green Lanes
SA39 Travis Perkins Palmers Green, Bridge Drive, Broomfield Lane
SA42 Fords Grove Car Park
SA43 Lodge Drive Car Park (incl. Depot), Palmers Green
SA44 Land opposite Enfield Crematorium (known as The Dell). Great
Cambridge Road
SA50 6 Morson Road
SA51 Montagu Industrial Estate
SA52 Land West of Rammey Marsh
SA53 Car Park Site, Wharf Road

Former Gasworks sites

SA25 and SA26 are associated with a former gasworks site, a highly contaminative former use. These sites will require detailed intrusive investigation to characterise any soil and groundwater contamination on site, and any development scheme will be required to fully establish the risks to controlled waters. Groundwater is sensitive at this location as the sites lie atop a Secondary A Superficial aquifer (River Terrace Deposits).

Industrial sites

We note that a number of sites have an industrial proposed use. These sites are:

SA30 Claverings, Centre Way, London N9 0AH
SA46 Crown Road Lorry Park
SA47 Ravenside Retail Park
SA48 Land at 135 Theobalds Park Road
SA49 Land to the south of Millmarsh Lane, Brimsdown Industrial Estate
SA50 6 Morson Road
SA51 Montagu Industrial Estate
SA52 Land West of Rammey Marsh
SA53 Car Park Site, Wharf Road
SA54 Land East of Junction 24
SA55 Land to the North West of Innova Park

The exact end uses of these sites have not been specified. Certain industrial activities (such as an installation or waste activity) will require an Environmental Permit. Operators of these sites should use the [Check if you need an environmental permit](#) guidance for specific permitting requirements for their site, and if further guidance is required then contact the Environment Agency.

Cemetery developments

The following sites are proposed for burials, crematoria and cemetery developments:

SA58 Alma Road Open Space
SA59 Firs Farm Recreation Ground (Part)
SA60 Sloemans Farm
SA61 Church Street Recreation Ground

Developers for these sites should refer to Section L (Cemetery Developments) of the Environment Agency's [Approach to Groundwater Protection](#) and Cemeteries and burials: [prevent groundwater pollution](#)

Historic landfills

The following sites have been identified as partly or fully overlying historic landfills:

SA8 Sainsburys, Crown Road

SA9 Colosseum Retail Park

SA40 Land known as Brimsdown Sports Ground

SA44 Land opposite Enfield Crematorium (known as The Dell). Great Cambridge Road

SA46 Crown Road Lorry Park

SA47 Ravenside Retail Park

SA50 6 Morson Road

SA51 Montagu Industrial Estate

SA52 Land West of Rammey Marsh

SA53 Car Park Site, Wharf Road

SA55 Land to the North West of Innova Park

SA56 Land at Picketts Lock

Development on historic landfills may require an Environmental Permit. Developers for these sites would need to make enquires regarding potential requirements under the Environmental Permitting Regulations 2016.

Duty to Co-operate

Most natural resources extend across multiple Local Authority areas. We encourage the Council to make full use of the Duty to Co-operate when revising this draft local plan. Cross-boundary, collaborative working will ensure that strategic priorities across local boundaries are properly co-ordinated. Please consider this when addressing climate change, flood risk, waste management, habitat and biodiversity enhancement, watercourse protection and improvement, water and waste resources.

Final comments

We would be happy to work with the Council to review any evidence base documents and draft policies prior to the Regulation 19 consultation. This will be chargeable in line with our planning advice service. If you wish to request a document review or meeting, please contact us using the details below. Further information on our charged planning advice service is available at; <https://www.gov.uk/government/publications/planning-advice-environment-agency-standard-terms-and-conditions>.

Thank you for consulting us on the draft local plan, we hope that our comments are useful. Please don't hesitate to get in touch if you have any questions.

Yours sincerely