

7. Planning and Environmental Policy Context

7.1 Introduction

7.1.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) and Section 70(2) of the Town and Country Planning Act 1990 require that planning applications must to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.

7.1.2 This Chapter identifies the provisions of the statutory development plan and other relevant policy and guidance that have informed or otherwise apply to the proposed development. Figure 2.5 in Chapter 2 of this Statement illustrates the location of the proposed development and key planning and environmental designations in its vicinity.

7.1.3 The statutory development plan covering the LBE in Greater London, against which the planning application for the proposal has to be considered, consists of the following:

- The London Plan, Spatial Development Strategy for Greater London (2011);
- The London Plan – Revised Early Minor Amendments (October 2013);
- The Enfield Plan Core Strategy 2010-2025 (2010), and
- Saved Policies from Enfield Borough Council’s Unitary Development Plan (1994).

7.1.4 Emerging planning policy and guidance documents have also been reviewed as, dependent upon their stage in the preparation, they can provide guidance that is material to planning decisions.

7.1.5 These adopted and emerging provisions of the development plan sit under a comprehensive body of European Directives, Government regulations and national policy. This Chapter identifies the relevant provisions of this body of policy in the following order:

- European Policy and Guidance
- National Policy and Guidance
- Regional Policy and Guidance – The London Plan and Supplementary Guidance
- Sub-Regional Policy and Guidance
- London Borough of Enfield Policies
- Other Relevant Considerations

7.1.6 This chapter sets the context for Chapter 8 of this statement, in which the Upgrade is assessed against relevant policy and other material considerations.

7.2 European Policy and Guidance

Urban Waste Water Treatment Directive (1991/271/EEC)

7.2.1 The objective of the Urban Waste Water Treatment Directive (UWWTD), as implemented by the Urban Waste Water Treatment Regulations (England and Wales) 1994, is to protect the environment from the adverse effects of wastewater discharges. It sets treatment levels on the volume of the discharge and the sensitivity of the waters receiving the discharge. In July 1998, the River Lee and Lee

Navigation were designated as a sensitive area (eutrophic) under the UWWTD. Rivers with this eutrophic designation have a high level of nutrients which can cause excessive growth of algae and other plants which affect aquatic biodiversity, and the quality of the water overall.

- 7.2.2 Previous Asset Management Plan (AMP) projects have included investment at Thames Water sewage treatment works higher up the River Lee catchment which have reduced nutrient inputs to the river. Thames Water has also made significant investment in upgrades to the London Tideway sewage works during AMP5 (2010-2015). However, the River Lee and Lee Navigation remain eutrophic and there is a need to reduce nutrient inputs to the lower stretches of the river from Deephams Sewage Works. Hence the new Environmental Permit which comes into force in March 2017.

Freshwater Fish Directive (2006/44/EC)

- 7.2.3 The Freshwater Fish Directive (FFD) (2006/44/EC) has been integrated into the Water Framework Directive (2000/60/EC) and as a result was repealed on 22nd December 2013, 13 years after the Water Framework Directive entered into force. The Directive sought to improve and protect those fresh water bodies identified as waters suitable for sustaining fish populations. For those waters it sets monitoring requirements and physical and chemical water quality objectives for salmonid waters and cyprinid waters or other species such as pike, perch and eel.
- 7.2.4 In 2003, the stretch of the River Lee downstream of Deephams Sewage Works was designated as a cyprinid water under the Directive. The Directive sets physical and chemical water quality objectives for these type of waters to support fish belonging to the cyprinids. Since fish are particularly sensitive to ammonia which is present in sewage, the Environment Agency's National Environment Programme (NEP) requires that Deephams Sewage Works be improved in order to provide more effective removal of ammonia and meet a tighter environmental permit.

Water Framework Directive (2000/60/EC)

- 7.2.5 The Water Framework Directive (WFD) as implemented by the Water Environment (WFD) (England and Wales) Regulations 2003, is designed to improve and integrate the way water bodies are managed throughout Europe. It aims to enhance the status and prevent further deterioration of aquatic ecosystems, groundwater and associated wetlands, which depend on them. In England and Wales, the Environment Agency is the competent authority responsible for implementation of this Directive.
- 7.2.6 The lower stretches of the River Lee into which Deephams Sewage Works discharges (via Salmons Brook) currently fail the chemical water quality requirements of the Directive. The Environment Agency's NEP requires various improvements at Deephams Sewage Works.

Waste Framework Directive (2008/98/EC)

- 7.2.7 The purpose of the Directive is to protect the environment and human health by preventing or reducing the adverse impacts of the generation and management of waste and by reducing overall impacts of resource use and improving the efficiency of such use.

Habitats Directive (92/43/EEC)

- 7.2.8 The Habitats Directive aims to contribute towards ensuring biodiversity through the conservation of natural habitats and of wild fauna and flora.

Environmental Impact Assessment (EIA) Directive (2011/92/EC)

- 7.2.9 The EIA Directive applies to the assessment of those projects likely to have significant effects upon the environment. Thames Water is undertaking an EIA and therefore the provisions of this Directive will apply.

- Common Strategy on the Implementation of the Water Framework Directive, 2001
- Water Quality Standards Directive (2008/105/EC)

7.3 National Policy and Guidance

Future Water – The Government’s Water Strategy for England

- 7.3.1 The Government’s National Water Strategy is set out in Future Water published in February 2008. The Strategy aims to improve, by 2030, the quality and ecology of the water environment and ensure sustainable use of water resources.
- 7.3.2 The strategy recognises that nutrient pollution from sewage works effluent is an issue and that action needs to be taken at sewage treatment works to address the issue.

Water for Life – Government’s White Paper on Water

- 7.3.3 The Water for Life, published in December 2011, sets out the current Government’s plans for the water industry. A key component of the White Paper is to sustainably improve water quality in the natural environment and to meet the Government’s obligations under European Directives.
- 7.3.4 The White Paper states that *“improvements to London’s sewage system, would reduce the current unacceptable level of sewage overflowing into the tidal Thames, bring the water quality up to a standard that meet international benchmarks, and help ensure that the system has the capacity to meet the future needs of a growing population and changing rainfall patterns caused by climate change”* (Page 55).

Water Act (May 2014)

- 7.3.5 The Water Bill was presented to Parliament in June 2013 and was enacted in May 2014. The Act brings forward various measures relating to the operation and regulation of the water supply and sewerage systems in the UK, including reforms relating to Sustainable Urban Drainage Systems and Environmental Permitting.

Defra’s Strategic Policy Statement to Ofwat – Incorporating Social and Environmental Guidance (May 2013)

- 7.3.6 The Strategic Policy Statement stems from Government’s White Paper on Water - Water for Life and provides the overarching context for the more detailed Social and

Environmental Guidance. The policy statement has been issued to assist Ofwat to contribute to the Government's wider social and environmental goals as set out in their sustainable development duty.

- 7.3.7 Defra's Social and Environmental Guidance to Ofwat states, "*Water and Sewage Companies should continue to actively plan for new development and increasing demand on both water and sewerage networks, and to engage with planners, consumers, developers and others to ensure that the system is resilient and capable of supporting sustainable growth*" (Paragraph 3.8.2).

National Planning Policy Framework (NPPF), March 2012

- 7.3.8 The NPPF was published in March 2012, replacing the previous planning policy guidance notes and planning policy statements, with the exception of Planning Policy Statement 10. The NPPF is based upon a presumption in favour of sustainable development, incorporating economic, social and environmental roles. Local planning authorities are required to apply the presumption in favour of sustainable development when assessing and determining development proposals (paragraph 197).
- 7.3.9 The NPPF identifies 12 core land use policy principles that should underpin both plan-making and decision-taking. It sets out Government policy relating to infrastructure, flood risk, nature conservation, protection of the historic environment, good design and alongside various other issues that have informed the detail of the Deephams Sewage Works Upgrade.
- 7.3.10 The NPPF explains at paragraph 109 that "*The planning system should contribute to and enhance the natural and local environment by ... preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of ... water ... pollution*".
- 7.3.11 When considering the evidence base for future developments paragraph 162 of the NPPF requires that Local Planning Authorities "*work with other authorities and providers to: assess the quality and capacity of infrastructure for ... water supply, wastewater and its treatment ... and its ability to meet forecast demands*".

National Policy Statement for Waste Water, March 2012

- 7.3.12 The National Policy Statement (NPS) for Waste Water, designated on 26th March 2012 forms part of the overall framework of national planning policy. As stated in Chapter 1, the Deephams Sewage Works Upgrade is not considered to fall within the definition of a Nationally Significant Infrastructure Project (NSIP). However, whilst aimed principally at providing guidance in the preparation and determination of applications for Development Consent for NSIPs under the Planning Act 2008, the NPS can be a material consideration under the 1990 Planning Act (as amended) and therefore applicable to this planning application, as confirmed in paragraph 1.1.7 of the NPS.
- 7.3.13 The NPS identifies the importance of providing adequate infrastructure to meet current and future needs and outlines the Government's key objectives for waste water:

- Sustainable development
- Public health and environmental improvement
- To improve water quality in the natural environment
- To reduce water consumption
- To reduce demand for waste water infrastructure capacity
- Climate change and mitigation adaption
- Water hierarchy

7.3.14 As explained in Chapter 4, the NPS recognises that the need for improvement of wastewater treatment at Deephams Sewage Works is driven by European and national statutory water quality requirements. The improvements are essential to ensure that Salmons Brook and the River Lee (to which it flows) meet environmental quality standards to comply with the Freshwater Fish Directive, and Water Framework Directive and to ensure that there is no deterioration in the current classification as a result of increased volumes of discharge.

7.3.15 The NPS reiterates the presumption in favour of sustainable development and identifies that good design is essential and that proposals need to consider the impacts of climate change. The NPS explains that decision takers should focus on whether a development itself is an acceptable use of the land, and the impacts of that use, rather than the control of processes or emissions. The NPS also provides guidance on generic impacts of waste water infrastructure that the decision maker should take into account, including:

- Water quality and resources
- Odour
- Flood risk
- Biodiversity and geological conservation
- Landscape and visual impacts
- Land use, including public space, green infrastructure and green belt
- Noise and vibration
- Historic environment
- Air quality and emissions
- Dust, artificial light, smoke, steam and insect infestation
- Traffic and transport impacts
- Waste management
- Socio-economic

Planning Practice Guidance (PPG), Launched March 2014

7.3.16 The PPG website was formally launched on 6th March 2014. As a consequence of the launch of the PPG a series of previous guidance documents have been cancelled.

7.3.17 The PPG provides guidance a range of topics including the following of relevance to the proposed development:

- Air quality
- Climate change
- Conserving and enhancing the historic environment
- Design
- Environmental Impact Assessment

- Flood risk
- Heath and wellbeing
- Land affected by contamination
- Light pollution
- Natural environment
- Renewable and low carbon energy
- Travel plan and transport assessment
- Water supply, wastewater and water quality

7.3.18 The PPG identifies the importance of adequate water supply and wastewater infrastructure to support sustainable development.

Waste Management Plan for England, December 2013

7.3.19 The Waste Management Plan has been prepared to fulfil the requirements of the Waste Framework Directive and replaces the Waste Strategy 2007. The plan sets out how the Waste Hierarchy is applied in England, and how waste management is regulated by the Environment Agency to prevent harm to human health and the environment. The plan also sets a number of targets including recovery of construction and demolition waste. The plan also highlights the Government's ambitions for waste highlighting the importance of putting in place the right waste management infrastructure at the right time and in the right location.

7.3.20 The plan does not apply to the management of wastewater as this is specifically excluded from the Waste Framework Directive as wastewater is covered by other legislation.

Planning Policy Statement 10 (PPS10) – Planning for Sustainable Waste Management, March 2011

7.3.21 PPS10 identifies the Government's commitment to protect human health and the environment by producing less waste and by using it as a resource wherever possible. PPS10 promotes a more suitable waste management system, moving the management of waste up the 'waste hierarchy' of prevention, preparing for reuse, recycling, and other recovery, with waste disposal as a last resort.

7.3.22 The PPS encourages the provision of sustainable waste management infrastructure of the right type, in the right place and at the right time. A key objective of the PPS is to help secure the recovery or disposal of waste without endangering human health and without harming the environment. The PPS also sets out a series of locational criteria against which the suitability of sites for waste management and the likely impact upon the environment and on amenity should be considered.

Updated national waste planning policy: Planning for sustainable waste management (Consultation Draft), July 2013

7.3.23 The updated national waste policy statement is intended to replace PPS10 when adopted. The draft statement carries forward many of the same principles as PPS10 and seeks to ensure positive planning delivers sustainable waste management and development, driving waste up the waste hierarchy. The draft statement carries forward the locational criteria against which the suitability of sites for waste

management and the likely impact upon the environment and on amenity should be considered.

The UK Renewable Energy Strategy 2009

- 7.3.24 The UK Renewable Energy Strategy published in July 2009 sets out the action plan up to 2020 to increase the use of renewable energy. The Government has committed to sourcing 15% of its energy from renewable sources by 2020. The strategy states that biomass is a versatile source of renewable energy and can be used in a number of different ways to create bioenergy.

Circular 17/91 – Water Industry Investment: Planning Considerations

- 7.3.25 Circular 17/91 provides guidance to planning authorities on the need to plan for the long-term requirements and implications of water industry investment programmes. The Circular advises local planning authorities to *“give sympathetic consideration to development proposals aimed at enhancing the treatment of sewage”* (Paragraph 7). It highlights the need to avoid delays in obtaining planning consent and the need to expedite works that meet water companies’ obligations; *“in considering development proposals expeditiously, local planning authorities should nevertheless assess and weigh thoroughly all material considerations and any conflicting demands”* (Paragraph 21).
- 7.3.26 The Circular notes, *“for some discharges the [Environment Agency] will require more extensive works to provide secondary or even further stages of treatment”* (Paragraph 5). It advises, *“treatment plant are an integral part of the outfall and, for reasons of hydraulics and cost, must be reasonably near it. The scope for water companies to vary the location of surface works is therefore limited. The works will usually, although not always, be too large to accommodate underground.”* (Paragraph 5)

Circular 06/05 – Biodiversity and Geological Conservation

- 7.3.27 The Circular provides administrative guidance on the application of the law relating to planning and nature conservation.

Urban Waste Water Treatment (England and Wales) Regulations 1994 (as Amended 2003)

- 7.3.28 The Urban Waste Water Treatment Regulations implement the Urban Waste Water Treatment Directive 1991 (see Section 7.2 above), with the aim of protecting the environment from the adverse effects of wastewater discharges.

The Water Environment (Water Framework Directive) (England and Wales) Regulations 2003

- 7.3.29 The Water Environment Regulations implement the Water Framework Directive which aims to improve and integrate the way water bodies are managed, with a focus on ecology.

The Town and Country Planning (Environmental Impact Assessment) Regulations 2011

7.3.30 As with the EIA Directive, as the proposed development has been confirmed as being a project for which an EIA is necessary, the provisions of these Regulations will apply.

7.4 The London Plan – Spatial Development Strategy for Greater London (2011)

7.4.1 The London Plan is part of the statutory development plan against which the planning application for the proposal must be considered. A policy-by-policy assessment of the London Plan's consistency with the National Planning Policy Framework March 2012 (NPPF) has been undertaken by the Greater London Authority (GLA) with Revised Early Minor Alterations to the London Plan published in October 2013 which serve to ensure the Plan is consistent with provisions in the NPPF.

7.4.2 The London Plan provides the spatial strategy for the capital up to 2031, and anticipates that there will be significant growth and regeneration in north London through planned redevelopment and enhancement within identified opportunity areas. The main focus of growth and regeneration within the Deephams Sewage Works catchment will be within that part of the catchment that lies within the Upper Lee Valley Area of Opportunity. The 2011 London Plan anticipates that across the 3,884 hectares that make up the Opportunity Area, 15,000 jobs will be created and a minimum of 9,000 new homes will be constructed in the plan period up to 2031.

7.4.3 The London Plan Policy 5.14 recognises that adequate sewage treatment provision is a fundamental component to achieving sustainable communities. The London Plan also supports proposals that would benefit water quality and development proposals to upgrade London's sewage treatment capacity.

7.4.4 The London Plan policies that are relevant to the proposed development include:

Strategy

- Policy 1.1: Delivering the strategic vision and objectives for London

London's Places

- Policy 2.1: London in its global, European and United Kingdom context
- Policy 2.2: London and the wider metropolitan area
- Policy 2.6: Outer London: vision and strategy
- Policy 2.7: Outer London: economy
- Policy 2.13: Opportunity areas and intensification areas
- Policy 2.17: Strategic industrial locations
- Policy 2.18: Green infrastructure: the network of open and green spaces

London's People

- Policy 3.2: Improving health and addressing health inequalities

London's Response to Climate Change

- Policy 5.1: Climate change mitigation
- Policy 5.2: Minimising carbon dioxide emissions
- Policy 5.3: Sustainable design and construction

- Policy 5.5: Decentralised energy networks
- Policy 5.6: Decentralised energy in development proposals
- Policy 5.7: Renewable energy
- Policy 5.9: Overheating and cooling
- Policy 5.10: Urban greening
- Policy 5.11: Green roofs and development site environs
- Policy 5.12: Flood risk management
- Policy 5.13: Sustainable drainage
- Policy 5.14: Water quality and sewerage infrastructure
- Policy 5.16: Waste self-sufficiency
- Policy 5.17: Waste capacity
- Policy 5.18: Construction, excavation and demolition waste
- Policy 5.20: Aggregates
- Policy 5.21: Contaminated land

London's Transport

- Policy 6.1: Transport – Strategic approach
- Policy 6.3: Assessing effects of development on transport capacity
- Policy 6.9: Cycling
- Policy 6.10: Walking
- Policy 6.13: Parking
- Policy 6.14: Freight

London's Living Places and Spaces

- Policy 7.1: Building London's neighbourhoods and communities
- Policy 7.2: An inclusive environment
- Policy 7.3: Designing Out Crime
- Policy 7.4: Local character
- Policy 7.5: Public realm
- Policy 7.6: Architecture
- Policy 7.8: Heritage assets and archaeology
- Policy 7.13: Safety, Security and Resilience to Emergency
- Policy 7.14: Improving air quality
- Policy 7.15: Reducing noise and enhancing soundscapes
- Policy 7.16: Green Belt
- Policy 7.19: Biodiversity and access to nature
- Policy 7.21: Trees and Woodlands
- Policy 7.24: Blue Ribbon Network
- Policy 7.26: Increasing the use of the Blue Ribbon Network for freight transport
- Policy 7.27: Blue Ribbon Network: supporting infrastructure and recreational use
- Policy 7.28: Restoration of the Blue Ribbon Network
- Policy 7.30: London's canals and other rivers and waterspaces

Implementation Monitoring and Review

- Policy 8.2: Planning Obligations
- Policy 8.3: Community Infrastructure Levy

Draft Further Alterations to The London Plan January 2014

- 7.4.5 In January 2014 the GLA published Draft Further Alterations to the London Plan (FALP) for consultation, which closed on 10th April 2014. The FALP have been prepared primarily to address key housing and employment issues emerging from an analysis of census data released since the publication of the London Plan in July 2011, and which indicate a substantial increase in the capital's population. When adopted, these alterations will take the plan forward to 2036, with the Upper Lee Valley Area of Opportunity now expected to provide a minimum of 20,100 new homes.
- 7.4.6 The FALP include various minor changes to the wording of Policies in the London Plan, although the changes are not considered to fundamentally change the emphasis or relevance of policies identified above.

7.5 The London Plan – Associated Supplementary Planning Guidance and Strategies

Draft Control of Dust and Emissions during Construction SPG (September 2013)

- 7.5.1 The Mayor has issued for public consultation draft supplementary planning guidance (SPG) on the Control of Dust and Emissions during Construction and Demolition.
- 7.5.2 This SPG provides guidance on the implementation of London Plan policy 7.14 - Improving Air Quality, as well as a range of policies that deal with environmental sustainability, health and quality of life.

Upper Lee Valley Opportunity Area Planning Framework (July 2013)

- 7.5.3 The Upper Lee Valley Opportunity Area Planning Framework (ULV OAPF) was adopted by the Mayor in July 2013 in accordance with London Plan Policy 2.13. It has been produced by the GLA working with TfL and the London Boroughs of Enfield, Haringey, Waltham Forest and Hackney. The ULV OAPF sets out an overarching framework for the regeneration of the area and is to be amplified where necessary by each boroughs' own planning documents for specific areas. It is Supplementary Planning Guidance to the London Plan and is a material consideration in the determination of planning applications.
- 7.5.4 Deephams Sewage Works is located within the Upper Lee Valley Opportunity Area, and the ULV OAPF has therefore informed the details of the Deephams Sewage Works Upgrade. Deephams Sewage Works is identified as part of an area for regeneration, with growth areas at Ponders End and Meridian Water to the north and south respectively. The ULV OAPF acknowledges that Deephams Sewage Works will continue to be a feature of this area and states that this will need to be considered when allocating other land uses (Section 5.4, Page 98).

Safeguarded Wharves Review – Final Recommendation (March 2013)

- 7.5.5 The review has been carried out to update the Safeguarded Wharves Implementation Report 2005 in accordance with London Plan Policy 7.26: Increasing the use of the Blue Ribbon Network for freight transport. The 'Final Recommendation' and supporting documentation has been submitted to the

Secretary of State for approval and issue of required new/revised Safeguarding Directions.

- 7.5.6 The review identifies opportunities to transport construction and demolition materials on London's canal network in connection with major waterside development sites such as Meridian Water, and recognises that Ash Wharf, adjacent to Edmonton EcoPark, has potential as a site for the loading and unloading of barges with a payload of up to 100 tonnes. The review concludes that: *"specific development projects that are occurring alongside the canal network have the opportunity to be supplied with construction materials and have demolition waste removed. However this would be on a temporary basis so would not require safeguarding of specific wharves"* (Paragraph 4.5.3). However, the report also acknowledges that this is subject to it being practical, economic and environmentally desirable to do so.

Shaping Neighbourhoods: Character and Context SPG (June 2014)

- 7.5.7 Although there is no specific requirement in the SPG for planning applications to be supported by an assessment of character and context, development proposals are required to provide high quality design in accordance with London Plan Policy 7.4. The SPG therefore provides guidance on how the requirements of the policy can be considered, and has therefore been taken into account in the detailed proposals for the Deephams Sewage Works Upgrade.

Shaping Neighbourhoods: Play and Informal Recreation SPG (September 2012)

- 7.5.8 The SPG supports the implementation of policies in Chapter 7 of the London plan regarding shaping neighbourhoods. It therefore promotes an approach that supports the presence of children and young people in the built environment.

Draft Social Infrastructure SPG (May 2014)

- 7.5.9 The draft Social Infrastructure SPG emphasises the importance of social infrastructure in contributing to quality of life. It provides guidance to support London Plan Policy 3.16 on the protection and enhancement of social infrastructure, along with policies 3.17 on health and social care facilities, 3.18 on education facilities and 3.19 on sports facilities.

Draft SPG on Accessible London (April 2014)

- 7.5.10 The draft SPG contains guidance on the implementation of Policy 7.2 within the London Plan regarding the creation and promotion of an accessible and inclusive environment, and on other policies that specifically reference inclusive design.

London Planning Statement SPG (May 2014)

- 7.5.11 The 'London Planning Statement' SPG is intended to fill the gap left by the Government's revocation of the former Government Office for London Circular 1/2008 by pulling together information about the Mayor's role in the London Planning system, both in preparing the London Plan and in taking planning decisions on strategic developments.

- 7.5.12 Under the Town and Country Planning (Mayor of London) Order 2008, the Mayor of London will be consulted on the Upgrade planning application as it falls within the definition of a strategic application as a waste development occupying a site over one hectare. In addition to commenting on the application, the Mayor has the right to issue a direction to the LBE to require the application to be referred to him for final determination if he so requires.

Use of Planning Obligations in the Funding of Crossrail and the Mayoral Community Infrastructure Levy SPG (April 2013)

- 7.5.13 The SPG updates guidance on implementation of London Plan policies on the funding of Crossrail, planning obligations and the Community Infrastructure Levy (CIL) and replaces the SPG on "use of planning obligations in the funding of Crossrail" published in July 2010. The Deephams Sewage Works Upgrade does not fall within any of the identified areas or categories that would be subject to contributions towards Crossrail.
- 7.5.14 The Mayor has brought forward a CIL charging schedule to enable him to use the Levy to fund strategically important infrastructure. The Mayoral CIL for Enfield is set at a rate of £20 per square metre of gross internal floor space. However, this will not apply to the majority of the Deephams Sewage Works Upgrade, due to the nature of the development proposed. Under the CIL Regulations, developments comprising buildings into which people do not normally go, or go only for the purposes of inspection or maintenance, do not give rise to a CIL liability.

Green Infrastructure and Open Environments: The All London Green Grid SPG (March 2012)

- 7.5.15 The All London Green Grid (ALGG) SPG takes the principles of the East London Green Grid (ELGG). It applies them across London by providing guidance on the implementation of London Plan Policy 2.18 to protect, conserve and enhance London's strategic network of green and open natural and cultural spaces; encourage greater use of, and engagement with, London's green infrastructure, and secure a network of high quality, well designed and multifunctional green and open spaces.
- 7.5.16 The concept of a "green grid" – an integrated network of green and open spaces together with the Blue Ribbon Network of rivers and waterways – is at the centre of the London Plan's approach to the provision, enhancement and management of green infrastructure (Policy 2.18). This network of spaces functions best when designed and managed as an interdependent 'grid'.
- 7.5.17 The ALGG SPG aims to promote the concept of green infrastructure, and increase its delivery by boroughs, developers, and communities, by describing and advocating an approach to the design and management of green and open spaces to deliver hitherto unrealised benefits. These benefits include sustainable travel, flood management, healthy living, and creating distinctive destinations; and the economic and social uplift these support.
- 7.5.18 The SPG identifies land to the north and east of Deephams Sewage Works as part of the Lee Valley and Finchley Ridge Green Grid Area, which extends the Lee Valley Green Grid established as part of the ELGG.

Sustainable Design and Construction SPD (April 2014)

- 7.5.19 The SPG provides guidance on the implementation of London Plan Policy 5.3 - Sustainable Design and Construction, as well as a range of policies, primarily in Chapters 5 and 7 that deal with matters relating to environmental sustainability.

The Mayor's Air Quality Strategy: Clearing the Air (December 2010)

- 7.5.20 The Mayor's Air Quality Strategy aims to reduce air pollution in London from both transport and from buildings and development. It sets out a package of measures, including proposals to make construction and demolition sites cleaner through the implementation of Best Practice Guidance (BPG). The BPG will be replaced by the 'Control of Dust and Emissions during Construction and Demolition' SPG once the latter is published.

The Mayor's Climate Change Mitigation and Energy Statement: Delivering London's Energy Future (October 2011)

- 7.5.21 The Mayor's Climate Change Mitigation and Energy Statement includes specific objectives to reduce London's CO₂ emissions to mitigate climate change; to maximise economic opportunities from the transition to a low carbon capital; ensure a secure and reliable energy supply for London, and to meet, and where possible exceed, national climate change and energy objectives. The strategy recognises that one of the main opportunities to increase renewable energy generation in London is through advanced conversion technologies, including anaerobic digestion.

The Mayor's Climate Change Adaptation Strategy: Managing risks and Increasing Resilience (October 2011)

- 7.5.22 The Mayor's Climate Change Adaptation Strategy sets out a strategic approach to managing climate risks. It includes policies to reduce and manage current and future flood risk and the impact of extreme weather events in London, and identifies actions to improve the resilience of London's infrastructure to climate change.

The Mayor's Water Strategy: Securing London's Water Future (October 2011)

- 7.5.23 The Mayor's Water Strategy states that wastewater should be seen as a resource and that opportunities should be sought to reduce the greenhouse gas emissions generated from the treatment of wastewater, including through the use of sewage sludge as a source of low-carbon energy. In particular the Strategy seeks to *"minimise the release of untreated wastewater and diffuse pollution into the water environment"*.
- 7.5.24 The strategy encourages water companies to develop new wastewater resources cost effectively and with the least environmental and social impacts as possible. The strategy acknowledges at paragraph 6.6.2 that the treatment of sewage sludge can be used to generate renewable energy. Action 20 states that, *"The Mayor will work with Thames Water and other partners to identify ways in which the management of sewage can provide renewable energy and reduce greenhouse gas emissions"*.
- 7.5.25 At paragraph 6.8.8 the strategy states that the Mayor will work with Thames Water to investigate ways to develop the sewage sludge strategy to meet the objectives

and targets of the Mayor's Climate Change Mitigation and Energy Strategy by maximising the production of renewable energy whilst meeting the operational needs of Thames Water. Whilst the Upgrade is not upgrading the sludge treatment stream it is upgrading the CHP engines and increasing the use of sludge gas. Any future upgrade of the sludge treatment stream that may be funded would be the subject of a separate planning application.

The Mayor's Transport Strategy (May 2010)

7.5.26 The Mayor's Transport Strategy has been incorporated into the London Plan.

River Basin Management Plan – Thames River Basin District (2009)

7.5.27 River Basin Management Plans (RBMP) are drawn up by Defra as a requirement of the Water Framework Directive. The Thames River Basin District RBMP was adopted in 2009. It identifies that Thames Water is planning to upgrade the Deephams Sewage Works.

Greater London Authority Best Practice Guidance

7.5.28 The following relevant Best Practice Guidance (BPG) has been prepared in partnership by the Great London Authority and London Council's and have been used to inform the proposed development:

- BPG: Health Issues in Planning (June 2007)
- BPG: The Control of Dust and Emissions from Construction and Demolition (November 2006)

7.6 Sub-Regional Policy and Guidance

Lee Valley Regional Park Authority (LVRPA) Plan 2000 and the Park Development Framework

7.6.1 The area to the east of Deephams STW and north of Picketts Lock Lane forms part of the Lee Valley Regional Park, none of the application area is within the Park.

7.6.2 The LVRPA are a statutory consultee on planning applications within, or which impact upon the Park. The LVRPA adopted the Vision, Aims and Principles of the Park Development Framework in 2010, which states that LVRPA will *'seek to ensure that all planning approvals relating to land outside the Park boundaries will have no negative impact of the Park, and where possible lead to a positive contribution to our vision, aims and objectives'* (Page 3).

7.6.3 The LVRPA adopted its Park Development Framework Thematic Proposals in 2011 and these are being translated into a series of area based proposals to replace the preceding Park Plan 2000. The area of the Park closest to Deephams STW is known as Area 4.A.4 Picketts Lock and Lee Park Way, part of Area 4: The Wetlands. The riparian planning authorities are under a mandatory obligation to include those parts of the plan affecting their areas within their own relevant planning strategies and policies.

7.6.4 There are six aims that are expanded upon with objectives and proposals within the suite of documents that form the Park Development Framework. The six aims

reflect the range of demands for the future development and management of the Park:

- Visitors – A Park that is a high quality and regionally unique visitor destination;
- Sport and Recreation – A Park that delivers a range of high quality opportunities for sport and recreation;
- Biodiversity – A Park that delivers a high quality biodiversity resource for the region;
- Community – A Park that helps people improve their wellbeing;
- Landscape and Heritage – A Park landscape that embraces the physical, cultural and social heritage of the area's fantastic landscape; and
- Environment – A Park that contributes to the environmental sustainability of the region.

7.6.5 In respect of the water environment the Park Development Framework Thematic Proposals state that the Park Authority will continue to work with Thames Water and other partners to deliver improvements to water quality (page 92), and minimise and mitigate any impacts on the Park arising from new or increased wastewater treatment capacity (page 94).

7.6.6 The Area Proposals for Picketts Lock and Lee Park Way (Area 4.A.4) do not set out specific policies, rather a series of aspirations based upon the six aims, which include:

- Develop Picketts Lock as a strategic leisure destination within the Park;
- Continue to develop and operate Lee Valley Athletics Centre as a regional centre of excellence for sport providing world class facilities;
- Protect and enhance the ecological value of the Lee Park Way and the Lee Navigation as a wildlife corridor;
- Positive characteristics of the existing landscape to be protected and further improvements made throughout the area;
- Land in industrial use south of Picketts Lock adjoining Lee Park Way to be screened; and
- Work with the Canal and River Trust and other stakeholders on options for securing the Lee Navigation as a route for waterborne transport.

Emerging North London Waste Plan

7.6.7 Seven North London Boroughs (Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest) are working together to prepare the waste planning policies and proposals for the North London area. The North London Waste Plan is presently in its early stages of preparation following a launch consultation on the content of a new plan held between 19 April and 7 June 2013. This resulted in the publication of the Launch Consultation Report in July 2013. Consultation on a new draft NLWP is expected in early 2015, with the Plan due to be adopted in 2017.

7.7 London Borough of Enfield Policies

Enfield Plan Core Strategy 2010-2025, adopted November 2010

7.7.1 The Enfield Core Strategy sets out the spatial planning framework for the next 15 to 20 years including the broad strategy for the scale and distribution of development. The Core Strategy policies that are relevant to the proposed development, and which are assessed in Section 8 of this statement, include:

- Core Policy 1: Strategic growth areas
- Core Policy 11: Recreation, leisure, culture and arts
- Core Policy 14: Safeguarding Strategic Industrial Locations (SILs)
- Core Policy 20: Sustainable energy use and energy infrastructure
- Core Policy 21: Delivering sustainable water supply, drainage and sewerage infrastructure
- Core Policy 22: Delivering sustainable waste management
- Core Policy 24: The road network
- Core Policy 25: Pedestrians and Cyclists
- Core Policy 27: Freight
- Core Policy 28: Managing flood risk through development
- Core Policy 29: Flood management infrastructure
- Core Policy 30: Maintaining and improving the quality of the built and open environment
- Core Policy 31: Built and landscape heritage
- Core Policy 32: Pollution
- Core Policy 33: Green belt and countryside
- Core Policy 35: Lee Valley Regional Park and Waterways
- Core Policy 36: Biodiversity
- Core Policy 37: Central Leaside
- Core Policy 38: Meridian Water
- Core Policy 39: Edmonton
- Core Policy 40: North East Enfield
- Core Policy 41: Ponders End
- Core Policy 46: Infrastructure contributions

Enfield Unitary Development Plan (UDP) Saved Policies

7.7.2 The LBE's UDP was adopted in March 1994 and has been partly superseded by the adopted Core Strategy. A number of the policies contained in the UDP are saved and remain in force until such a time as they are replaced by other policies in Enfield's Local Plan. The saved UDP policies that are relevant to the proposed development, and which are assessed in Section 8 of this Planning Statement, include:

- Policies (II) G7 & G8: Landscape Measures
- Policies (II) G11, G17, G18 & G19: Environmental Measures affecting New Development
- Policies (II) G20 & G21: Urban Edge
- Policies (II) O3, O7, O8 & O9: Green Chains
- Policies (II) C36, C37, C38 & C39: Tree Protection
- Policies (II) GD3, GD6 & GD8: Planning Standards
- Policies (II) E14 & E15: Environmental Standards
- Policy (II) T1, T13: Land Use and Transportation
- Policies (II) T30 & T32: Parking

Enfield Borough Council: Proposed Submission Draft Development Management Document, March 2013

7.7.3 The Proposed Submission Development Management Document (DMD) (March 2013) was formally submitted to the Secretary of State for independent examination

on 24th January 2014 together with an Addendum of Focused Changes. In May 2014 Proposed Main Modifications to the DMD were published for public consultation, as a result of the Examination process. The emerging DMD policies that are relevant to the proposed development, and which are assessed in Section 8 of this statement, include:

- DMD 37: Achieving High Quality and Design-Led Development
- DMD 38: Design Process
- DMD 44: Preserving Heritage Assets
- DMD 45: Parking Standards and Layout
- DMD 47: New Roads, Access and Servicing
- DMD 48: Transport Assessments
- DMD 49: Sustainable Design and Construction Statements
- DMD 50: Environmental Assessment Methods
- DMD 51: Energy Efficiency Standards
- DMD 52: Decentralised Energy Networks
- DMD 53: Low and Zero Carbon Technology
- DMD 54: Allowable Solutions
- DMD 55: Use of Roof Space / Vertical Surfaces
- DMD 56: Heating and Cooling
- DMD 57: Responsible Sourcing of Materials, Waste Minimisation and Green Procurement

- DMD 58: Water Efficiency
- DMD 59: Avoiding and reducing Flood Risk
- DMD 60: Assessing Flood Risk
- DMD 61: Managing Surface Water
- DMD 62: Flood Control and Mitigation Measures
- DMD 63: Protection and Improvement of Watercourses and Flood Defences

- DMD 64: Pollution Control and Assessment
- DMD 65: Air Quality
- DMD 66: Land Contamination and Instability
- DMD 68: Noise
- DMD 69: Light Pollution
- DMD 70: Water Quality
- DMD 75: Waterways
- DMD 76: Wildlife Corridors
- DMD 77: Green Chains
- DMD 78: Nature Conservation
- DMD 79: Ecological Enhancements
- DMD 80: Trees on Development Sites
- DMD 81: Landscaping
- DMD 82: Protecting the Green Belt
- DMD 83: Development Adjacent to the Green Belt
- DMD 84: Areas of Special Character

Central Leaside Area Action Plan, Discover Central Leaside Towards a draft Area Action Plan (May 2012)

- 7.7.4 The Central Leaside Area Action Plan (CLAAP) covers the Jubilee, Lower Edmonton, Edmonton Green and Upper Edmonton wards (Deephams Sewage Works is located

in the Lower Edmonton Ward). The Central Leaside Interim Direction Document was published for consultation from the 8th May until the 3rd August 2012. It provides an outline of the emerging AAP content and its wider framework by introducing a number of potential opportunities related to Deephams Sewage Works, Picketts Lock, Edmonton Eco Park, Meridian Water and Angel Road Retail Park.

7.7.5 The Interim Direction Document identifies that the *“proposed upgrade works at Deephams Sewage Treatment Works presents significant opportunities to improve the quality of the effluent discharged to Salmons Brook and the River Lee. The upgrade has the potential to increase treatment capacity to cater for population growth and replace parts of the plant supported by energy and ecological links that maximises the potential of its location in Central Leaside”* (page 26).

7.7.6 The Interim Direction Document highlights at pages 88 and 89 that the Deephams Sewage Works Upgrade requires consideration of good design to minimise visual impacts. The potential for Deephams Sewage Works to contribute to a decentralised energy network is also highlighted as an opportunity for the Central Leaside Area along with the potential to use the River Lee Navigation to transport materials to and from the site. The document identifies the following opportunities that are expected to arise as a result of the proposed development:

- Sustainable treatment of wastewater;
- Provision of heat and energy to support the kick start phase of a decentralised energy network in Central Leaside with possible expansion into neighbouring authorities and connection into the Olympic Park;
- High quality design standards which effectively combines function and form to help address the visual impact on the local landscape;
- Measures to ensure that congestion on the wider transport network is not exacerbated;
- Measures to minimise noise impacts along the eastern boundary of the site adjacent to the Lee Valley Regional Park;
- The use of the River Lee Navigation to transport materials to and from the site;
- A design-led approach to provide a distinctive and well functioning environment with high quality design, materials and finish;
- Landscape treatment throughout the site to enhance ecological links to the wider Central Leaside area;
- Tree planting to visually improve and enhance the site’s image;
- An integrated long-term landscape and ecological management and maintenance plan;
- Increased biodiversity and an ecological link created by planting more waterside trees, shrubs and wild flower grass mixes;
- Increased connectivity into the Lee Valley Regional Park;
- Ground water protection;
- Surface water management;
- Promote sustainable transport for staff;
- Green industry employment; and
- Awareness raising.

Community Infrastructure Levy (CIL), Preliminary Draft Charging Schedule, May 2013

- 7.7.7 Under the provisions of the draft charging schedule the proposed development would fall under the “all other uses category” and is therefore not liable for CIL, being rated as it is at £0 per square metre.

Enfield’s Local Development Framework, Section 106 Supplementary Planning Document (November 2011)

- 7.7.8 The SPD details requirements for S106 agreements and is a material consideration in the determination of planning applications. The SPD sets out the circumstances in which a S106 agreement is likely to be required and provides details on the type and level of contribution necessary, having regard to the current economic climate and viability issues. A draft heads of Terms for a s106 agreement is submitted with this planning application. It is included in Planning Application Folder - Tab 10.

Edmonton EcoPark Planning Brief, Supplementary Planning Document to the Local Plan (Adopted May 2013)

- 7.7.9 The Edmonton EcoPark is located approximately 400m to the south of Deephams Sewage Works. The Edmonton EcoPark Planning Brief is a Supplementary Planning Document to Enfield’s Local Plan, which provides guidance on the future development of the EcoPark. Guidance in the SPD is a material consideration and will be considered by the LBE in the assessment of any future planning applications for the EcoPark site, or the potential effect upon the future delivery of development at the site.

Meridian Water Masterplan, Planning and Urban Design Guidance (Adopted 17th July 2013)

- 7.7.10 Meridian Water is located to the south of Deephams Sewage Works and the Edmonton EcoPark. The Masterplan expands on Core Policy 38 in the adopted Enfield Core Strategy (2010). Meridian Water is the largest regeneration priority area identified in the Core Strategy where it is proposed a comprehensive approach to development will take place. Meridian Water is also a key component of the Upper Lee Valley Opportunity Area Planning Framework. The Masterplan provides a framework for managing change and development in the area and explains how the key objectives established in the Core Strategy for Meridian Water could be delivered. It also provides further guidance about the impact of the changes proposed.

7.8 Other Relevant Considerations

Local Policy in Adjacent London Boroughs

- 7.8.1 The proposed development is located in proximity to the administrative boundaries of the London Borough of Haringey, and the London Borough of Waltham Forest. The following planning policy documents have therefore also informed the detailed proposals for the Deephams Sewage Works Upgrade:

London Borough of Haringey

- Haringey's Local Plan: Strategic Policies 2013 – 2026 (March 2013)
- Haringey's Local Plan: Draft Development Management Policies Consultation Document (March 2013)
- Haringey Unitary Development Plan (2006) Saved Policies – Refer to Appendix 1 of Haringey's Local Plan: Strategic Policies 2013 – 2026 (March 2013)
- Sustainable Design and Construction SPG (March 2013)
- Supplementary Planning Guidance 1a: Design Guidance (2006)
- Supplementary Planning Guidance 10a: The Negotiation, Management and Monitoring of Planning Obligations (2006)

7.8.2 The Environmental Statement has not identified any environmental effects arising from the Upgrade proposals within the London Borough of Haringey.

London Borough of Waltham Forest

- Waltham Forest Local Plan – Core Strategy (March 2012)
- Waltham Forest Unitary Development Plan (March 2006) Saved UDP Policies (Post Core Strategy Adoption) March 2012)
- Development Management Policies (Proposed Submission July 2012)
- Site Specific Allocations (Preferred Options 2013)
- Blackhorse Lane Area Action Plan (Proposed Submission March 2013)
- Blackhorse Lane Interim Planning Policy Framework (2006)
- Locally Listed Supplementary Planning Document

7.8.3 The Environmental Statement includes noise monitoring data for locations within LB Waltham Forest, and an assessment of the potential landscape and visual impact from viewpoints within that Borough.