

Planning Policy Team  
Enfield Council  
Civic Centre  
Silver Street  
Enfield  
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7<sup>th</sup> September 2011

Dear Planning Policy Team,

**Detailed Green Belt Boundary Review**

Thank you for consulting the North London Waste Authority (NLWA) on the proposed review of Green Belt boundaries in Enfield. The NLWA would like to comment on the amendment proposed at 'Site 24.1 Meridian Water - Boundary to the west of Advent Way' as this could impact on the future operations of the Edmonton EcoPark, a site protected for waste use within the London Plan and designated within the emerging North London Waste Plan as a 'key site for the delivery of waste services'.

The proposed change will bring the boundary of the Green Belt adjacent to an area reserved by the NLWA for potential future water transport. Work has been carried out to investigate the feasibility of using the Lee Navigation for transport by barge and we would wish to retain this as an option for the future. Should this be found to be feasible it is likely that the NLWA would propose works to the wharf and associated water frontage to enable this, bringing with it associated carbon benefits of reducing the percentage of vehicle movements to and from the site by road. Any such works would bring this existing wharf back into a productive use, but would potentially impact on the "openness" of the adjacent Green Belt and there is consequently a risk that planning permission would not be granted.

Waste is an ideal material to be transported by water and this sustainable means of transport can significantly reduce the carbon impact and local transport 'nuisance'. The work that has been undertaken on the lower part of the Lee Navigation associated with the Olympic and Paralympic Games' site development provides a good potential for any transport by water from an Upper Lee Valley site. The NLWA is pleased to be working to fully investigate the opportunity this presents.

The principle of using water to transport waste in a sustainable way is supported in national, regional and local planning policy. Policy 5.17 Waste Capacity of the recently adopted London Plan, states:

*"Proposals for waste management should be evaluated against... the full transport and environmental impact of all collection, transfer and disposal movements and, in particular, the*

*scope to maximise the use of rail and water transport using the Blue Ribbon Network” and “Land to manage borough waste apportionments should be brought forward through...safeguarding wharves (in accordance with policy 7.26) with an existing or future potential for waste management”.*

Furthermore transport of waste by water is supported by Enfield’s own Core Strategy, Policy 22 Delivering sustainable waste management states: “*The Council will require active consideration of sustainable transport of waste where it is not treated at source (e.g. via rail and water)*”.

The Green Belt Review should be consistent with the Core Strategy, as well as regional and national policy, which emphasise the potential of moving waste by water and support new facilities to be located in riverside locations. The NLWA therefore urges LB Enfield to reconsider this designation within the context of the above in order to facilitate the potential delivery of sustainable transport for waste in the future and to enhance the flexibility that this site presents for modern waste management. Should the Green Belt be amended as proposed the NLWA would wish to ensure that the new boundary is along the line of the Lea Navigation and does not cover the wharf itself so that the opportunities for reducing the percentage of road transport movements to a key waste site are not constrained.

Please do not hesitate to contact me should you require any further information.

Yours sincerely



**David Beadle**  
**Managing Director**