



## **ADVANCED PUBLICATION OF REPORTS**

This publication gives five clear working days' notice of the decisions listed below.

These decisions are due to be signed by individual Cabinet Members  
and operational key decision makers.

Once signed all decisions will be published on the Council's  
Publication of Decisions List.

- 1. MAKING THE COMPULSORY PURCHASE ORDER FOR MERIDIAN  
WATER STRATEGIC INFRASTRUCTURE WORKS (Pages 1 - 386)**

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**London Borough of Enfield****Operational Report**

**Report of** **Programme Director of Meridian Water in consultation with the Acting Executive Director of Resources and Director of Law and Governance**

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**Subject:** **Making the Compulsory Purchase Order for Meridian Water Strategic Infrastructure Works**

**Ward:** **Upper Edmonton**

**Executive Director:** **Sarah Cary**

**Key Decision:** **4832**

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**Purpose of Report**

1. Make the CPO under delegation of Cabinet as of 22nd January 2020 (KD 4832).

**Proposal(s)**

2. To note that Executive Director – Place has approved the Statement of Reasons and the Order Map.
3. For the Programme Director of Meridian Water, in consultation with the Acting Executive Director of Resources, Financial Management Services and Director of Law and Governance to make the CPO under delegation of Cabinet as of 22nd January 2020 (KD 4832).
4. To note that in line with delegations outlined at paragraphs 2.5.6 – 2.5.8 of the Cabinet Report dated 22nd January 2020 (KD 4832), procedural steps subsequent to the making of the CPO are to be approved by Executive Director - Place in a further authority report.
5. To note that government guidance as regards current constraints and restrictions caused by COVID-19 does not prevent the Council from making the CPO and that modifications and mitigation measures comply with publicity and service arrangements relating to the CPO.

**Reason for Proposal(s)**

6. In line with the Cabinet decision as of 22nd January 2020 (KD 4832), reasons to make the CPO at this time are to:

- Enable the Council to exercise control over the land required to implement development of the SIW of the Meridian Water regeneration area;
- Avoid delays to delivering the infrastructure which could put at risk the £156 million HIF funding that has been conditionally awarded by central government and thereby the delivery of the SIW;
- Avoid delay and potentially putting at risk the Meridian Water regeneration and the related economic, social and environmental benefits for the Borough and the local area
- Demonstrate to MHCLG that every effort was made to meet the deadline even if the CPO case is delayed by other factors or bodies outside the Council's control;
- Maximise the chance that the CPO is processed in a timely manner considering the possibility of excess case load from other local authorities. Earlier application would increase likelihood of earlier consideration by NPCU, PINS and Secretary of State;
- Minimise risk of further delays to the programme as the social distancing measures around Covid-19 are not fully lifted and remain under periodical review.

Progress made to date provides confidence that despite planning and HIF funding contract uncertainties, these will be resolved in advance of a potential inquiry. Queen's Counsel has reviewed the case and his comments were addressed as to mitigate possible objections. See Confidential Appendix for details.

### **Relevance to the Council's Corporate Plan**

7. This proposal will contribute to the Council's priorities: Good homes in well-connected neighbourhoods; safe, healthy and confident communities; and an economy that works for everyone.

### **Background**

#### *General Background*

8. On 22nd January 2020 Cabinet (KD 4832) authorised a CPO for the delivery of Strategic Infrastructure Works (**SIW**) at Meridian Water, subject to delegations, as were outlined at paragraphs 2.4, 2.5 and 2.7 of the Report.
9. The Meridian Water programme budget for the rest of 2019/20, as well as 2020/21 and 2021/22, was authorised as part of the Cabinet Report of 16th October 2019 and Full Council Report of 20th November 2019 (KD4469). This includes £11.3 million for infrastructure related land acquisition.
10. The CPO is for the acquisition of land and rights required to deliver the SIW at Meridian Water, not for the entire Meridian Water Regeneration Area. The SIW are required to unlock the development of land at Meridian Water enabling the delivery of up to 10,000 homes across the site. This includes the development of 2,300 homes at development zones 2 (part), 4 and 5 (see the plan in Appendix 3 to the Statement of Reasons) for which the

Council resolved to grant planning permission for 24th March, subject to finalising conditions and a legal agreement.

11. The final form of Statement of Reasons in support of the proposed Order has been approved by the Executive Director of Place and is appended at Appendix 3 of this report. Although the Statement of Reasons is non-statutory, it is an important document and, when the Order is made, it will be served on relevant parties with the required statutory notices of making of the Order. The Statement of Reasons has been prepared in accordance with Government Guidance on Compulsory Purchase, "Guidance on Compulsory purchase process and The Crichel Down Rules" (MHCLG CPO Guidance July 2019) ("the Guidance") and the "Coronavirus (COVID-19): compulsory purchase guidance" (MHCLG May 2020).

### *Funding*

12. On 17th August 2019 Central Government announced that, subject to agreement of terms and satisfaction of pre-contract conditions, the Council's bid for £156 million of Housing Infrastructure Funding (HIF) to deliver the SIW was successful. Receipt of grant will be subject to agreement of detailed terms and the satisfaction by the Council of pre-contract and pre-funding conditions set by Ministry of Housing, Communities and Local Government (MHCLG). Stace and CMPS, the project managers for the delivery of the Housing Infrastructure Works (non-rail and rail respectively), have prepared a programme of the activities required to deliver the SIW that meets with the HIF funding requirements, which include spending of HIF funding and delivery of SIW by March 2024. The Council is working towards achieving vacant possession of all the land by Q4 of 2021 in order to achieve the build programme. Furthermore, MHCLG have indicated that they want assurance that the Council will have the means to be in control of all the land required for HIF works before funding for the infrastructure works is advanced.
13. The HIF is allocated for non-rail works (covering roads, bridges, remediation and flood alleviation) and rail upgrade works (works to increase the train capacity serving Meridian Water station). The procurement of the contractor for non-HIF works is underway, bids have been submitted which are within the budget envelope. While the actual infrastructure costs could vary from the amount of HIF grant due to various factors such as emerging design specification or fluctuating macroeconomic parameters, the Council is actively monitoring and managing these risks to ensure costs stay within budget.
14. With regard rail works, the Council is working closely with key stakeholders including Network Rail to optimise the rail design solution, to unlock benefits for the wider network. The current preferred option has a budget that is an estimated £11-15 million higher than the currently HIF rail allocation. In order to deliver this enhanced solution, the Council is actively working to secure the additional funding, including through central government and other stakeholders. The Meridian Water team is currently working to the time frame of 6 months to secure the additional funding.

15. In the unlikely event where we are unable to secure the extra funding for the enhanced rail solution, at that point we would identify mitigation measures which we would present in an authority report to Cabinet, (with a timeframe sufficiently prior to any CPO inquiry), to address budgetary position.
16. Detailed terms and conditions of grant funding are currently being negotiated between the Council and MHCLG. It is expected that the Grant Agreement will be entered into by August 2020. Conditions precedent to funding are at several levels:
  - a) Pre-commencement conditions – these are conditions that will need to be satisfied before the grant agreement can be entered into. Satisfaction of these conditions does not automatically make funding available. Since the beginning of 2020, all the pre-contract conditions were satisfied as confirmed by MHCLG.
  - b) Conditions precedent to making a claim for £26 million Preliminary Expenditure and Historic Cost – these are administrative in nature; and
  - c) conditions precedent to making any subsequent claim for funding i.e. funding for any works. The wording of the pre-works conditions is being finalised and the Meridian Water team is working closely with MCHLG and DfT to ensure all conditions can be satisfied. Progress to date provides confidence in the Council’s ability to satisfy outstanding conditions by Summer 2021, subject to their final wording which is currently being discussed.

Since January 2020, there has been a significant progress in agreeing the terms of funding conditions. While there is a risk that conditions to funding cannot be satisfied by the Council, the collaborative work undertaken with MHCLG to frame the conditions in a way that is achievable to the Council while ensuring that MHCLG’s funding safeguards are retained, forms a basis for confidence that outstanding conditions can be satisfied and will therefore not impede the delivery of SIW and drawdown of funding.

#### *Land Acquisition*

17. As at the present date, the Council secured ownership of circa 44 acres, that is 72% of the land to be acquired within the CPO area. In terms of the remaining land, in the first instance the Council is aiming to acquire land by private treaty, however, a CPO is necessary to ensure that land required for the SIW can be acquired. The Council has been acquiring land within the CPO area since 2015. In addition, TerraQuest, (the Council’s Land Referencing consultant) has identified registered ownership and rights in the CPO land to establish contact with the remaining qualified parties. Following diligent enquires, contact has been made with affected parties and the Council has informed all the owners of land interests affected by the Order. The Council is attempting to acquire interests by agreement and has commenced negotiations with all known parties. These negotiations will continue in parallel with the CPO process.

18. Since the 22<sup>nd</sup> January 2020 (KD 4832), the Council has agreed terms and completed the acquisition of land at Anthony Way together with land and buildings adjoining and continues to work towards concluding terms via private treaty on other land within the CPO area, so as to assemble land voluntarily and mitigate the extent of third party interests and risks. Terms have recently been agreed with another party and the Council is in the process of progressing this acquisition. Furthermore, negotiations are continuing with remaining parties, alongside the CPO process.

### *Planning*

19. In preparing the SIW planning application significant pre-application engagement was undertaken with the local business and residents, the Local Planning Authority, statutory and non-statutory consultees. Community consultation exercises were held in April and May 2019 including two engagement days, one on 23 April and one on 18 May. A Statement of Community Involvement was also submitted with the planning application and provides further details of the community consultation and engagement undertaken to date. A 'full' planning application (ref: 19/02717/RE3) for the SIW was granted on 22 July 2020.

### *Public Interest*

20. Officers are satisfied that there is a compelling case in the public interest to make the compulsory purchase order as described in detail in the Statement of Reasons. The CPO is based on the need for SIW which will contribute to the achievement of objectives specified in Sections 226 (1)(a) and 226(1A) of the 1990 Act: to facilitate the carrying out of development, redevelopment or improvement on or in relation to land in its area, and that such development will contribute to the promotion or improvement of economic, social and environmental well-being of the area.

Officers consider that the compulsory purchase order will satisfy all the tests set out in the Guidance on compulsory purchase orders and the Crichel Down Rules. Statement of Reasons describes in detail the following justification for use of Compulsory Purchase Powers:

- The purpose for which the land is being acquired fits with the adopted planning framework for the area.
  - The SIW will contribute to the social, economic and environmental well being of the area.
  - The design of the SIW proposed is the only viable means to achieve the planning policy objectives.
  - the Scheme is viable and SIW have general indication of funding intentions.
21. Since 22<sup>nd</sup> January 2020 (KD 4832), the Council has commissioned extensive review of Equalities Impact Assessment by Ottaway Strategic Management Limited and an action plan has been put in place for mitigation measures. This provides greater understanding of equality duty

consideration under Section 149 of the Equality Act 2010 and puts the Council in a more prepared position in regard to further progress on the CPO. Please see section 9 for details.

*Progress since January 2020*

22. The Council has undertaken all necessary preparations to make the CPO. The final Order Map (CPO Plan) and schedule are attached. Important programme milestones have been achieved since Cabinet authorised the CPO in January 2020, strengthening its case from planning policy and development management perspectives. Officers are satisfied that there is a compelling case in the public interest for acquiring the land compulsorily as set out in the Statement of Reasons (see Appendix 3). On 29<sup>th</sup> January 2020, the Council adopted Edmonton Leaside Area Action Plan (ELAAP), and on 22<sup>th</sup> July planning application for the SIW was granted permission.

*Updated programme*

23. On 11th March 2020, World Health Organization (WHO) recognised pandemic coronavirus SARS-CoV-2. Later that month, the United Kingdom government passed the Coronavirus Act 2020 and introduced measures to restrict non-essential travel, social contact, close large number public venues' categories and reduce public transport service. The measures are disrupting and delaying a range of services across public and private sector, potentially including CPO notice service and other procedures required by the Acquisition of Land Act 1981. It is therefore important to consider the current coronavirus outbreak and its impact on operations in deciding on timing of making the CPO. There is no certainty over when public and private sector could revert back to a normal regime of operations.

On 13th May 2020, the government published 'Coronavirus (COVID-19): compulsory purchase guidance' and updated this on 27 May 2020. This covered several practical considerations such as Royal Mail delivery recording and correspondence with NPCU. The guidance does recommend increasing time periods for people to respond to a CPO notice as some may not be able to reach a post box or there may be a delay in response due to illness or postal system. The guidance does not prevent local authorities from making CPOs. It also confirms that local authorities may publish the order and map online to comply with requirements to make documents available for inspection in a 'place'. These recommendations were incorporated into the Mitigation Plan (see 'Main Considerations for the Council'). In addition, the Council has consulted on its CPO COVID-19 mitigation measures with MHCLG, receiving feedback on the proposed steps as being reasonable.

24. There have been delays to the making of the CPO, principally as a result of the Covid-19 pandemic. Fortunately, the HIF delivery programme has contingencies built in to it to allow for unforeseen delays. Whilst part of this contingency has been used up, there is still an element of contingency remaining and we are confident that the current programme is robust and the Council will be able to meet the HIF delivery programme if the Council proceeds with the making of the CPO in accordance with the timeframe currently proposed. See Confidential Appendix for details.

## Main Considerations for the Council

25. The Council is pro-active in addressing any future factors of uncertainty as regards the CPO. Whilst it is acknowledged that the detailed terms of the grant agreement are currently being negotiated and the full amount of funding will not be advanced until a number of conditions have been satisfied, there is sufficient confidence in resolving these by the period of CPO inquiry given the progress to date described above.
26. It is acknowledged that the Council will need to have the resources to implement the scheme irrespective of how actual costs will vary from the HIF grant amount due to various factors such as emerging specification of design options or changing macroeconomic conditions. However, there are diminishing merits to postponing the decision to make the CPO until there is full clarity over these parameters, as the Council is actively and continuously monitoring these risks, discussing a range of scenarios with key stakeholders and preparing mitigation strategies. Programme budget approved in October 2019 includes contingency; moreover, CPO budget includes contingency costs for the CPO process delay (see Confidential Appendix for details). Finally, further delay to making the CPO could exacerbate the risk of not securing HIF grant due to failure of complying with MHCLG deadlines.
27. In light of COVID-19 social distancing measures, the Council developed a mitigation plan with its consultants to ensure compliance with the CPO requirements:

	<b>Requirement</b>	<b>Issues</b>	<b>Mitigation</b>
M1	Objection Period: statutory minimum objection period is 21 days.	Due to current 'lockdown' recipients of notices may receive their notices later, or these may be sent to business addresses whose employees are working from home so not received. Therefore it is possible that interested parties may miss the opportunity to submit an objection in time. Royal Mail are currently holding the undelivered post for an extended period of 30 days before returning to sender.	Provide an extended 42 day objection period. TerraQuest to monitor the status of recorded deliveries via the Royal Mail website, deal with undelivered post on a case-by-case basis, seek alternative address via establishing a contact with the served party.
M2	Publicity: statutory requirement is site notice; press notice and service of notice to qualifying persons	The current lockdown restrictions have relaxed, however, some social distancing measures are still in place, with some households shielding themselves until at least 31 <sup>st</sup> July 2020. As a result, there are fewer opportunities for people to see a site notice when passing by a public venue. Similarly, readership of newspapers may be reduced due to limited opportunities for people to purchase a copy. Royal Mail and other delivery services are providing a less frequent/reliable service and are scaling back the	Contact all parties by email/phone/letter before making the CPO to give them additional warning and ask if there are additional modes of service and addresses that can be used. Where no contact is possible, TerraQuest will search additional addresses on general web research or old copies of title information (or similar documentation). TerraQuest are regularly monitoring the advice of Royal Mail. The website will also be available for the public to inspect the Order.

services offered. Served parties may be hesitating or unable to travel to collect the notice due to the lockdown measures.

<p>M3 Publicity: the CPO and Map is required to be deposited for inspection within the locality.</p>	<p>The intention was to deposit a copy of the CPO in the Council Civic Centre and at a Fore Street library (close to Meridian Water). As at the date of this report, only two libraries in Enfield have re-opened to the public, but they are not in a normal mode of operation. Edmonton Green Library re-opened on 13<sup>th</sup> July and is intended to be used as the inspection venue, as it is close to Meridian Water. However, it is acknowledged that this could be subject to change, if there was a further lockdown and also there are restrictions in place due to COVID-19, including a cap on the number of people who can be at the library.</p> <p>The Civic Centre, whilst open for essential staff, is closed to the general public and only the Order and accompanying map will be displayed on the noticeboard outside the main entrance. The Order schedule will not be available to view at this location. Therefore, there are some restrictions to placing the CPO in a physical location for inspection by the public.</p> <p>However, redacted copies of the documents will be available on the Council's website and electronic or hard copies can be provided to parties on request.</p>	<p>The Council intends to publish the CPO, Maps, Schedule and Statement of Reasons on its website. This will be noted on the notices which will state the website address. Government's COVID-19 CPO guidance was followed in preparing publication measures plan and states that a website will be considered a place for inspection in compliance with the legal requirements. While MHCLG is not able to confirm as satisfactory any local authority's action plan, the Council's mitigation plan was shared with MHCLG who raised no concerns.</p>
<p>M4 Make the CPO in time under MHCLG deadlines.</p>	<p>Central government may introduce further isolating measures with a potential of higher uncertainty over or disruption of supply chain, making it harder or impossible for the Council to satisfy statutory CPO requirements and serve notices.</p>	<p>The reason for making the CPO at this time is that the HIF grant needs to be drawdown and spent by March 2024 making it essential that vacant possession of all the land is achieved in 2021. To mitigate the risk of missing the deadline, it is recommended to proceed with the CPO following the outlined mitigation plan.</p>

M5	Make the CPO in time under MHCLG deadlines.	Risk of criticism for an authority pursuing a CPO under current circumstances.	The Council or its agents are in contact with the majority of impacted parties. The website and newspaper notices exist to ensure wide publicity of the Order and avoid prejudice. The mitigation measures outlined above will also ensure that consultation is undertaken as fairly as possible.
M6	Make the CPO in time under MHCLG deadlines.	Even if the Council makes the CPO now, the CPO timetable may be impacted if Planning Inspectorate (PINS) postpone inquiries. Applications may be put on hold on any live objection periods.	Make the CPO at this time to increase the chance of earlier consideration of the application by NPCU, PINS and Secretary of State even in such a scenario that applications and objection periods will be put on hold or delayed by decision-makers outside the Council's control, assuming that consideration will resume on the 'first come first served' basis.

### Safeguarding Implications

28. Not applicable.

### Public Health Implications

29. See Cabinet Report KD 4832. An online copy of the Order will be published due to Coronavirus social distancing measures.

### Equalities Impact of the Proposal

30. The initial Equalities Impact Assessment was conducted in December 2019 internally by the Council, with a subsequent extensive review by external consultant Ottaway Strategic Management in February-March 2020. Both assessments identified no direct negative impact that would impede the CPO. The EQIA is attached at Appendix 2.

See Cabinet Report KD 4832 for equalities legislation framework relevant to a CPO.

### Environmental and Climate Change Considerations

31. Not applicable. Note that a separate report will be brought to Cabinet to appoint HIF main contractor for delivery of infrastructure.

### Risks that may arise if the proposed decision and related work is not taken

32. **Timetable for SIW delivery will not be met.** SIW land include parcels that are currently not owned by the Council. In the event that the CPO is not made the Council will continue to seek to acquire the necessary land by private agreement. However, there is no certainty that the Council will be

able to negotiate the acquisition of all the necessary land required to deliver the SIW.

33. **HIF grant will become unavailable.** It is a condition of HIF funding that the Council has assembled all the land in the infrastructure site to deliver the HIF works (SIW). Furthermore, it will be a requirement of the HIF grant that all £156m funding is claimed by the Council by March 2024. MHCLG has indicated that they are not prepared to extend their deadlines. Failure to make the CPO in time would highly likely result in HIF funding becoming unavailable.
34. **The wider Scheme delivery is jeopardised.** Failure to make the CPO and to comply with HIF grant requirements would result in significantly higher pressure on the Council to acquire all required land via private treaty and deliver needed infrastructure at its own risk, impacting both financing and timescales of the Scheme. Under resource constraint, the Council may need the scope of the Scheme to be reconsidered.

## Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks

35. Risks of making the CPO are explained in the table below:

	<b>Risk</b>	<b>Likelihood<sup>1</sup></b>	<b>Impact<sup>2</sup></b>	<b>Risk Score<sup>3</sup></b>	<b>Mitigation</b>
	<i>Relevant risks and the potential impact / consequence of each.</i>				<i>What existing processes / mitigations are in place to manage the risk?</i>
R1	NPCU may refuse to consider a CPO where the Council is unable to certify the requirements of the Acquisition of Land Act 1981 have been complied with.	1	5	5	See mitigation plan M2, M3. With known contacts of most parties affected and alternative publicity resources such as its website in accordance with the government-issued guidance, the Council has arranged alternative measures to certify its compliance with the Act's procedural requirements in accordance with the Government's COVID-19 CPO guidance. Moreover, the CPO Order, map and Schedule will be placed at Edmonton Green Library, which is proposed to serve as the physical inspection venue. However, it is acknowledged that this could be subject to change, if there was a further lockdown and also there are restrictions in place due to COVID-19, including a cap on the number of people who can be at the library.
R2	It is possible that parties may cite the Coronavirus pandemic as a grounds for objection.	2	2	4	See mitigation plan M5. The Council has already sought to mitigate risk of objections being successful by building a robust evidence base for the CPO and additional measures for serving the CPO and extending the time to object. If the Council becomes aware of particular difficulties that are being suffered due to the Coronavirus by those affected by the CPO, it could consider whether any additional help or assurances (such as a undertaking not to implement the CPO before certain date) could be provided. This would need to be considered on a case by case basis.

<sup>1</sup> 1=Remote 2=unlikely 3=possible 4=probable 5=highly probable

<sup>2</sup> 1=Insignificant, 2=minor, 3=moderate 4=major, 5=catastrophic, systemic failure

<sup>3</sup> Likelihood x Impact (Red Amber Green)

R3	Extending the period of objection from 21 days to 42 days would delay the point when the CPO is confirmed and land assembly for the SIW is completed, putting HIF programme deadline at risk.	5	2	10	See mitigation plan M1, M4, M6. While extending objection period may delay vacant possession by several weeks, it provides greater certainty over timeframe of the CPO as compared to delaying its making until the lockdown measures are lifted. It also strengthens robustness of the CPO.
R4	Objection received to the CPO by land interest holders. If any party with an interest in the land objects, this will likely result in a public local inquiry into the CPO, requiring time and significant resource. For a CPO of this size and complexity, it is highly likely that one of the parties will object to protect their position.	5	1	5	The team expects there to be objections to this Order and has built in adequate time for this in the CPO programme. The team is undertaking negotiations with third parties to seek to agree private treaty agreements, reducing the risk of objections. The team has prepared a robust Statement of Reasons to support the CPO case and receives ongoing legal advice. The programme and budget have allowed for a public inquiry. The experts that the team are working with will act as expert witnesses in the event of a public inquiry.
R5	The CPO is not confirmed in part or in whole, causing a delay in the delivery of the strategic infrastructure and, if the Council is unable to acquire land required by private treaty, also putting satisfaction of HIF funding agreement conditions at risk.	2	5	10	Potential grounds for this include objections over planning, deliverability and the impact on affected parties. Note that it is anticipated that a public inquiry will not happen for at least 6 months after making the CPO, by which time the factors above will be significantly more certain. The Council has the opportunity to address potential grounds for objection at a public inquiry, minimising the risk of the CPO not being confirmed. If it is not confirmed, there would be an abortive cost in relation to the fees. However, the Council also may fully address the cause of objection and then re-make the CPO or alternatively review infrastructure and development plan subject to land owned at that the time, albeit different from the scheme currently proposed.
R6	Actual HIF costs might vary from the funding allocation, especially since there is less certainty at the moment over the preferred rail solution: there is a possibility to deliver higher train frequency, but this would likely imply	3	3	9	To manage the risks associated with the rail, weekly Rail steering group meetings are taking place as well as design team meetings to resolve issues and monitor project delivery. To manage the strategic risks associated with project delivery, the executive management team hold monthly meetings to monitor the delivery of the HIF and the monthly spend. The

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costs above the allocation.

meetings are chaired by the Chief Executive of the Council. In addition, the Council is discussing emerging rail options with GLA, MHCLG and DfT, to determine potential funding gaps and identify additional funding sources. One scenario is to apply for additional funding from central government. This possibility will be ascertained within 6 months. Alternative scenario is to amend scope of rail work or negotiate rearrangement as to separate HIF rail and non-rail obligations. Costs of non-rail HIF works are continually monitored. Note there is potential to identify cost-saving opportunities through arrangements with HIF main contractor, whose appointment procurement is at its final stage.

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36. Note that risks 4 and 5 relate to strength of the CPO case which depends on fitness to planning framework, deliverability and funding. The Council acknowledges these factors and is pro-active in mitigating the associated risks as explained below:

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Deliverability and funding:

If MHCLG conditions are not satisfied, the Council would not be able to claim historic and preliminary costs, might miss the deadline of 31st March 2024 and ultimately risk the £156m funding.

The Meridian Water team is working closely with MHCLG, DfT, GLA and wider stakeholders to agree the grant documentation so that all parties are comfortable with the risks, obligations, requirements and conditions. All preconditions to contract have been satisfied and approved by MHCLG. The major matter outstanding is approval of rail design option and its funding before the contract can be signed.

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Planning:

Conditions of the Phase 2 planning permission are not satisfied (in time), or the planning application is rejected by the GLA, weakening the case for the CPO.

The SIW planning application was granted permission on 22 July 2020. Phase 2 outline application was granted permission subject to referral of the application to the Greater London Authority and the completion of a Section 106 Agreement. Current risk and status of planning is continually monitored to provide reasonable level of confidence that Phase 2 planning application has no major impediments. As the application is outline, the finer detail of the scheme will be secured through future reserved matters applications. Contributions to mitigate the impact of the development will be secured through a s106 legal agreement. The scheme is supported in strategic planning terms by the

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GLA and the majority of issues that were raised by the GLA have been addressed. It should be noted that waiting to make a CPO until planning permission is granted may not always be necessary and that may prejudice the development timetable (which is linked to and dictated by HIF funding). Proceeding to make the CPO while the planning application is still pending is a reasonable and calculated risk to take provided that there are no significant impediments to the planning application being granted permission.

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***Please note Part 2 report is now confidential appendix.***

## **Financial Implications**

37. See Confidential Appendix.

38. See Confidential Appendix.

## **Legal Implications**

**DRAFT: 20th July 2020 (MD & EP)**The Council has obtained advice on CPO matters from its internal Legal Services team, Trowers & Hamblins LLP and Guy Roots QC.

40. The Council proposes to use its compulsory purchase powers to help implement the strategic infrastructure which will form part of the Meridian Water Regeneration scheme. Under s226(1)(a) of the Town and Country Planning Act 1990 (as amended) (the **Act**) a local authority has a general power to make a compulsory acquisition of any land in their area to facilitate the carrying out of development, redevelopment or improvement in relation to the land. In order to exercise the s226 powers, the local authority must demonstrate that the proposed development/improvement is likely to contribute towards the promotion or improvement of the economic, social or environmental wellbeing of their area.
41. The making of a CPO should be a last resort and should be preceded by meaningful attempts to buy the land by agreement, save for lands where land ownership is unknown or in question.
42. The making of a CPO is an executive function by virtue of section 9D of the Local Government Act 2000 and the Local Authorities (Functions and Responsibilities) (England) Regulations 2000. Pursuant to section 9E(2) of the Local Government Act 2000, the Cabinet may arrange for the discharge of an executive function by an officer of the authority. At its meeting on 22nd January 2020 (KD 4832) Cabinet delegated authority to make the CPO to the Programme Director of Meridian Water in consultation with the Acting Executive Director of Resources and Director of Law and Governance.
43. On 13<sup>th</sup> and 27<sup>th</sup> May 2020, the government published its “Coronavirus (COVID-19): compulsory purchase guidance”. The additional protections as set out in paragraph 26 above will assist to demonstrate that the Council has acted carefully and in good faith in accordance with government guidance and mitigates the risk of challenge, giving the Council reasonable grounds to argue that an aggrieved person has not been 'substantially prejudiced' by the making of the CPO.
44. The Council will be required to demonstrate that there is a compelling case in the public interest for acquiring the land compulsorily. This is set out in the Statement of Reasons (see Appendix 3). In particular the Council must demonstrate that:
  - 44.1 it has, or will at least obtain, the resources to pay compensation for the land. Acquisition of any interests in land within the Order Land, including any statutory payments and disturbance compensation,

will be funded by the Council through its own resources. Payment of compensation will be made in accordance with the 'compensation code' which is the law as set out in the Land Compensation Acts 1961 and 1973 and the Compulsory Purchase Act 1965, as amended by subsequent legislation and supplemented by case law. Within the Meridian Water budget there are allocations for acquisition of land;

- 44.2 it has, or will at least obtain, the resources to implement the scheme. It is proposed that funding for the SIW will be secured by way of HIF grant from central government. On 17th August 2019 it was announced that the council's HIF bid for £156 million had been successful. However, the detailed terms of the grant agreement are currently being negotiated and the full amount of funding will not be advanced until a number of conditions have been satisfied by the Council. It is recommended that the CPO is made no earlier than a time when there is confidence, following negotiations with the GLA and MHCLG, that it can satisfy the conditions to funding and will be able to demonstrate this by the time of a CPO inquiry. It will be a requirement of funding that all grant funding must be claimed by March 2024. The advantages of delaying the making of the CPO must therefore be considered against the impact on delivery of the SIW in accordance with the milestone dates in the grant agreement. In the event that the HIF Grant Fund is insufficient to meet the full costs of infrastructure works delivery, the Council will need to demonstrate that it has or will obtain sufficient additional funding, including the timing of such funding; and
- 44.3 the scheme for which the CPO is made will not be prevented from proceeding due to some legal or other impediment, e.g. planning permission / non-supportive policy framework. The Edmonton Leaside area Action Plan ("ELAAP") was formally adopted by the Council on 29<sup>th</sup> January 2020. The scheme accords with the adopted policy framework. Ideally, planning permission should be in place (but CPO Guidance recognises that this is not always possible) and the scheme should accord with the adopted policy framework at the time of making of a CPO. Planning permission for the strategic infrastructure works was granted (subject to conditions) on 22<sup>nd</sup> July 2020. At its meeting on 24th March 2020 the Council's planning committee resolved to grant permission for the Phase 2 planning application subject to various conditions including Stage 2 referral to the GLA. The Mayor of London will have 14 days from the date of submission of the stage 2 referral to make a decision to allow the Local Planning Authority's decision to stand, to direct refusal or to take over the application. Proceeding to make a CPO while the planning application is still pending may be considered a reasonable and calculated risk to take provided that there is a degree of confidence that the planning application will be granted prior to the date of the public inquiry.
45. Once the Council makes a CPO, the timetable is no longer in the Council's control and will be set by the Secretary of State. As such it is important that

at the time of making a CPO the Council has met the Guidance criteria, or at least has sufficient confidence it will be able to meet the Guidance criteria by the time of a public inquiry (approximately six months later). Whilst a CPO can be withdrawn after it is made, this may expose the Council to risk of objectors being awarded their costs.

46. As an acquisition under the Act will extinguish third party rights, the Council will need to take care that it does not contravene the rights of individuals under the European Convention on Human Rights (the ECHR). Section 6 of the Human Rights Act 1998 makes it unlawful for the Council to act in any way which is incompatible with a right under the ECHR. Pursuant to Article 1 of the First Protocol to the ECHR, every person is entitled to the peaceful enjoyment of his or her possessions and no one shall be deprived of those possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law. In order to avoid contravening individual human rights by making a CPO, it must be demonstrated that the CPO is in the public interest and that it is necessary and proportionate to make the CPO. Provided the requirements of section 226 (1) and (1A) of the Act have been fulfilled (i.e. the development, redevelopment or improvement will contribute to the promotion or improvement of the economic, social or environmental well-being of the local authority's area), this will provide a very substantial basis upon which to make the case that the scheme is policy based and is consistent with statutory objectives.
47. The public sector equality duty under section 149 of the Equality Act 2010 requires the Council to have due regard to: (i) the need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010; and (ii) the need to advance equality of opportunity between persons who share a protected characteristic and persons who do not share it. The Equalities Impact Assessment prepared in connection with the Compulsory Purchase Order contains an Action Plan (see Appendix 2) which should be monitored throughout the process.
48. Officers must ensure that any processing of personal data in connection with the Compulsory Purchase Order complies with the provisions of the Data Protection Act 2018.
49. All legal documents to be entered into in connection with the subject matter of this report must be approved in advance by Legal Services on behalf of the Director of Law and Governance.

### **Workforce Implications**

50. Not applicable.

### **Property Implications**

51. There are no property implications arising directly from this report however it is anticipated that there will be future Property Implications as each individual property deal is negotiated as a result of the proposal set out herein.

52. Any future reports arising as a result of these proposals will need to be further reviewed and when property transactions are concluded Strategic Property Services will comment on the individual deals.
53. It may also be appropriate to add CPO property acquisitions monitoring to the risk register as well as delivery timetable is critical. And a delay on an acquisition of a property could have material effect.

### **Other Implications**

54. Not applicable.

### **Options Considered**

55. **Do not pursue a CPO.** This is not considered a viable option. The Council must ensure that it can acquire all land needed to deliver the SIW in accordance with the timetable set by MHCLG. It will be a requirement of the HIF grant that all £156m funding is drawn down by the Council and all SIW are delivered by March 2024. If the Order is not pursued at this time, there is significant risk that this timetable for delivery will not be met, jeopardising the availability of the full amount of HIF grant as well as the deliverability of the SIW and the wider Scheme. In the event that the CPO is not made the Council will continue to seek to acquire the necessary land by private agreement. However, there is no certainty that the Council will be able to negotiate the acquisition of all the necessary land required to deliver the SIW in time to meet the HIF deadlines.
56. **Delay making the CPO until there is greater certainty.** Ideally, relevant planning permissions and funding agreement with all conditions discharged would be in place and secure prior to making the CPO. There is also some uncertainty in relation to the Coronavirus pandemic, although the package of mitigation measures for making the CPO during the current Coronavirus pandemic and associated “lockdown” strictly follow (and in some cases exceed) the requirements set out in government guidance on making a CPO during the pandemic. However, as stated above, the HIF grant needs to be drawn down and spent by March 2024 and in order to achieve a build programme which meets this deadline, vacant possession of all the land needs to be achieved in Q4 2021. Furthermore, it is a condition of HIF funding that the Council has assembled all the land in the infrastructure site to deliver the HIF works. Making the CPO is necessary to ensure that this condition is satisfied in time to meet MHCLG’s contractual deadlines. Having reviewed the case, Queen’s Counsel agreed it would be reasonable to proceed to make the CPO at this time since delay in the hope of gaining more certainty would be counter-productive.

### **Conclusions**

57. Since the Cabinet’s decision to authorise making the CPO in January 2020, the Council has made significant progress in preparing the CPO case including a set of measures to comply with publicity requirements considering COVID-19 social distancing. Given its significance to the overall

HIF programme, timescales and funding agreement, it is recommended to make the CPO at this time.

---

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23.07.2020

### **Appendices**

1. Order Map
2. Equalities Impacts Assessment
3. Statement of Reasons

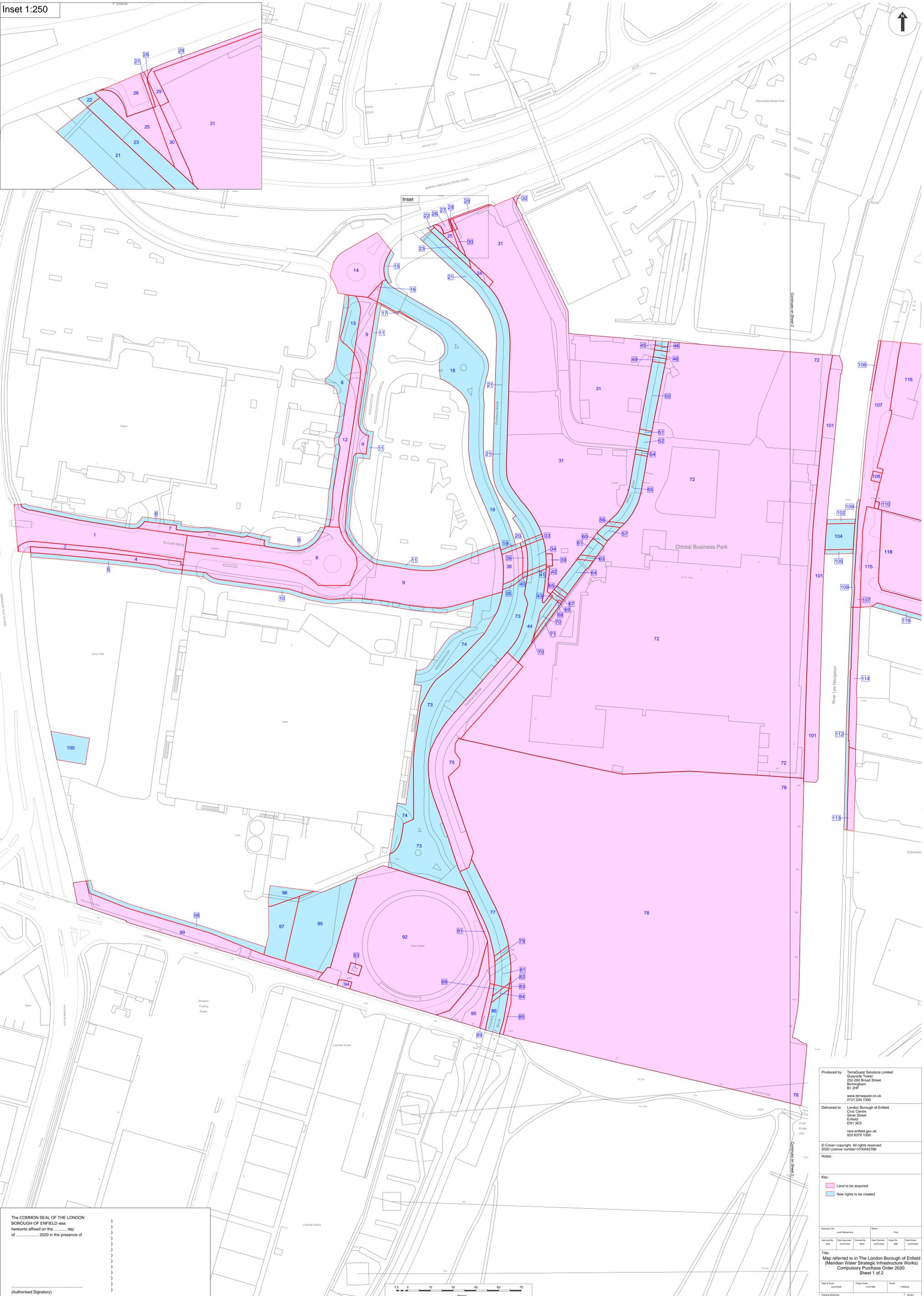
### **Background Papers**

The following documents have been relied on in the preparation of this report:

- 16/10/2019 – KD 4469 - Cabinet Meridian Water Financial Model and 10 Year Budget;
- 22/01/2020 – KD 4832 - Cabinet Meridian Water Infrastructure Compulsory Purchase Order;
- 12/02/2020 – KD 5085 - Cabinet Housing Infrastructure Fund grant agreement to deliver strategic infrastructure works at Meridian Water.

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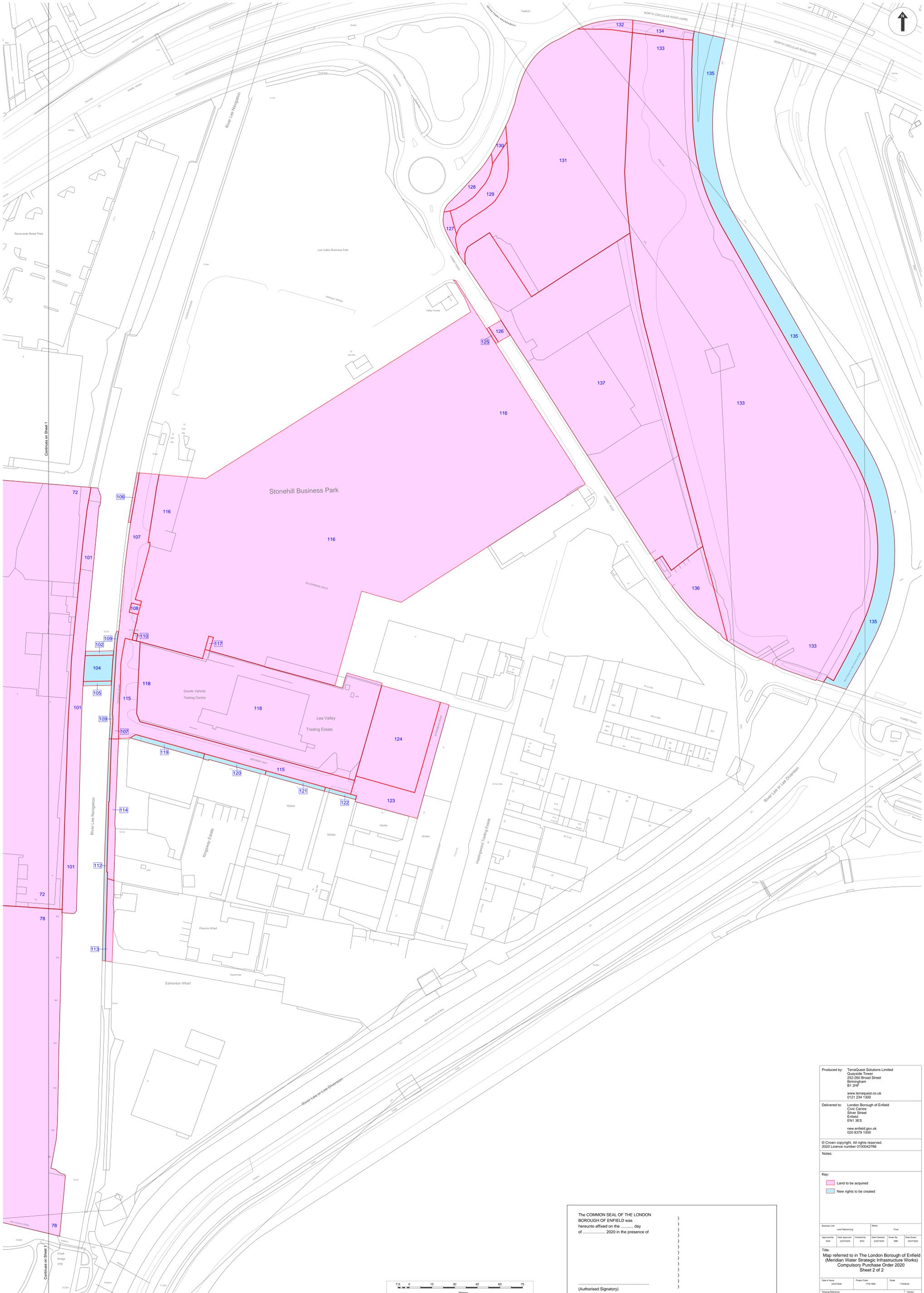
- Land to be acquired
- New rights to be created

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Date: 20/07/2020	Date: 20/07/2020	Date: 20/07/2020	Date: 20/07/2020

Title: Map referred to in The London Borough of Enfield (Meridian Water Strategic Infrastructure Works) Compulsory Purchase Order 2020 Sheet 1 of 2

Date of Issue: 20/07/2020 Project Code: 17/17/001 Scale: 1:250000  
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Business Unit	Lead Referring	Maker	Final
Approved By	Date Approved	Checked By	Date Checked
SAE	20/07/2020	500	20/07/2020
Drawn By	1/2/2018	1/2/2018	20/07/2020

Title:  
 Map referred to in The London Borough of Enfield  
 (Meridian Water Strategic Infrastructure Works)  
 Compulsory Purchase Order 2020  
 Sheet 2 of 2

Date of Issue: 20/07/2020  
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 Version: 01/0

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ENFIELD COUNCIL  
EQUALITY IMPACT  
ASSESSMENT  
MERIDIAN WATER  
STRATEGIC  
INFRASTRUCTURE WORKS

March 2020





**LB Enfield  
Equality Impact Assessment**

**Meridian Water Strategic Infrastructure Works**

**Independently Reported by Ottaway Strategic Management Ltd**

**March 2020**

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## 1 Executive Summary

### Introduction

- 1.1 The Council intends to make a Compulsory Purchase Order (CPO, the Order) in order to acquire land needed to deliver Strategic Infrastructure Works (SIW) as to unlock development of the area. This will have impacts and consequences to the businesses currently operating within the CPO boundary which need to be reviewed under the council's General Duty as set in the Equality Act 2010 through an Equality Impact Assessment.
- 1.2 Meridian Water is a major regeneration programme, of regional and sub-regional significance. Enfield Council is seeking to exercise its powers to CPO land critical to the completion of strategic infrastructure works (SIW) for the Meridian Water development scheme. The Council is the freeholder of the Orbital Business Park and the Stonehill Business Parkland, with its units occupied under non-protected tenancies. The CPO intends to acquire one business unit held in third party ownership that is currently operational on the site. Both the Council leaseholders and those occupying property in Third Party Ownership will have to vacate the site for the development and completion of the SIWs.

### Approach and methods

- 1.3 This Equality Impact Assessment (EQIA) has included a comprehensive desktop review of core legislation, policy and council papers (see appendix 3). It also includes a review of data held on the equality characteristic of the borough and the local ward, Upper Edmonton (see section 3). To support this desk top research an equalities survey of those businesses immediately affected by the regeneration proposals has been undertaken (see appendix 4). This specifically relates to those businesses occupying the land within the CPO red line, also referred to elsewhere as 'on site'.
- 1.4 There is no concrete information available about those who will be likely beneficiaries of the scheme once fully developed. However, it is clear that these potential beneficiaries will significantly outnumber those currently on the site and it is likely that they will be representative of all protected characteristics.

### Equality monitoring

- 1.5 Enfield is a borough with a diverse population. Ethnic profile data (2018) shows that in Enfield the Ethnic Minority<sup>1</sup> Population was 61.9% and the BAME<sup>2</sup> population was 36.8% and in Upper Edmonton, the ward where Meridian Water is situated, the Ethnic Minority population is 84.9% and the BAME population is 55.9%. The spread of other protected characteristics is broadly consistent between the Borough and Upper Edmonton, although in the case of age Upper Edmonton shows a higher proportion of younger people with 26.0% aged 0-15 compared to 22.9% for the borough.

---

<sup>1</sup> Ethnic minority is defined as people who differ in race or colour or in national, religious, or cultural origin from the dominant group of the country in which they live. For the purposes of this EQIA ethnic minority is used where people have not been defined as White British

<sup>2</sup> The acronym **BAME** stands for Black, Asian and Minority Ethnic and is **defined** as all ethnic groups except White ethnic groups

- 1.6 The equalities survey captured responses from 75% of businesses within the CPO red line. The findings addressed the protected characteristics of staff working in each business and key equalities data relating to business ownership. The survey was carried out via telephone and face to face engagement.
- 1.7 The survey identified that 66.1% of the workforce from responding businesses were from ethnic minorities and 33% BAME. These proportions are more consistent to the Borough than to Upper Edmonton, which in 2018 had a BAME population of 55.3%. The gender profile showed a 70%-30% male/female split, an age profile that shows 92% are aged between 22 and 54 years of age and a disability profile that shows 1.4% of the workforce. A fuller understanding of other protected characteristics is limited as many business managers and owners are not fully aware of their workforce make up in terms of faith, sexual orientation, and marriage and civil partnership. The level of pregnancy and maternity show 1.4% of the workforce are taking maternity leave.
- 1.8 Additional data showed that the workforce is predominantly local with 46% living in Enfield, and 72% living both in the borough and the immediate neighbouring boroughs. Moreover, the travel to work time for the workforce showed that 16% took less than 30 minutes and 82% took between 30 minutes and 1 hour. This also suggests that the workforce on the site is predominantly local.

#### **Regeneration proposals and consequences**

- 1.9 From a regeneration impact perspective, the CPO of the site, to secure the SIW will unlock the development, enable the wider investment into Meridian Water and thus progress to the Phase 2 Master Plan.
- 1.10 Specifically, the SIW will enable the development of:
- The Central Spine Road
  - Leaside Link Road
  - Brooks Park and River 'Naturalisation'
  - Edmonton Marshes and Flood Alleviation Works
  - Access Works
  - Earthworks, Remediation, Utilities and other ancillary works
  - Rail enhancement works
- 1.11 There will be consequential impacts on the businesses on the site who will have to vacate the site and find new locations in which to carry out their trades. This will have impact both on the businesses, their staff and the owners of these businesses. These regeneration consequences were seen by the majority as negative impacts to their businesses, with some suggesting there could be job losses and or business closures.
- 1.12 Staff and business owners from all protected characteristics will equally experience the indirect negative consequences of this regeneration activity. For example, if businesses must relocate then this would be applied to all their workforce irrespective of their protected characteristics. If a business were to close down this would apply to the owner and their workforce irrespective of their protected characteristics. If jobs were to be lost that would be irrespective of the protected characteristics of

these employees. What can however be established is the proportionality/disproportionality of these consequences and how these apply to different protected characteristics and different groups within each protected characteristic.

- 1.13 Whilst this EQIA is related to the CPO, it is important to note that the Order intention is to unlock wider Meridian Water development which will provide benefits for a significant number of future beneficiaries. There will be many more people who will benefit from the scheme in terms of housing, employment, leisure and amenity space and the appropriate infrastructure and connectivity needed to support the potentially huge growth in the population. It is likely that these beneficiaries will be from all protected characteristics. Whilst an EQIA is not a purely numbers based exercise it is clear that the regeneration impacts felt by those currently occupying the site will be outweighed by the volume of future beneficiaries.
- 1.14 The major findings of the business survey, supplemented by the reports from the interview team, have prioritised equality issues against the 9 protected characteristics, these are summarised below.

### Summary of EQIA findings

Table 1: Summary of EQIA findings by all 9 Protected Characteristics

Race	Gender	Trans-Gender
<ul style="list-style-type: none"> <li>• High levels of racial diversity 66% Ethnic Minority and 33% BAME</li> <li>• Resultant outcomes of the SIW likely to have positive impact from a race perspective</li> <li>• <b>From the evidence gathered there are no identified negative impacts of the CPO from a race perspective</b></li> <li>• <b>There are proportionally higher numbers of Ethnic Minority Staff that are exposed to possible business relocation/job losses</b></li> </ul>	<ul style="list-style-type: none"> <li>• Staff gender profile shows 71% men and 29% women</li> <li>• Inevitable impacts of business relocations with possibility of job losses - likely to be applied equally between male and female workforce members.</li> <li>• <b>From the evidence gathered there are no identified negative impacts of the CPO from a gender perspective</b></li> </ul>	<ul style="list-style-type: none"> <li>• No individuals identified who have undergone or are undergoing a gender transition process</li> <li>• <b>From the evidence gathered there are no identified negative impacts of the CPO from a gender re-assignment perspective</b></li> </ul>

## Disability

- 1.4% of the workforce on the site are stated as having a disability
- There may be some disturbance experienced by disabled people through moving away from the site, however this should be mitigated by their respective employers.
- **From the evidence gathered there are no direct negative impacts from a disability perspective.**

## Age

- The profile shows 45% of the workforce are aged 22-34, 32% are aged 35-44 and 15% aged 45-54.
- The workforce is relatively young and potentially mobile
- Older members of the workforce may find it more difficult to get re-employment should opportunities of moving with current business not work out, resulting in redundancy
- **From the evidence gathered there are no direct negative impacts from an age perspective**
- **There are however older members of staff who may find it harder to secure employment due to their age and skill sets and should be supported where possible.**

## Marriage/Civil Partnership

- Details about the marriage and or civil partnership status of those working on the site are not known
- The regeneration proposals do not manifest in a way to impact on the grounds of Marriage or civil partnership and therefore this characteristic is potentially irrelevant to this EQIA.
- **From the evidence gathered there are no direct negative impacts from a marriage/civil partnership perspective.**

## Pregnancy/maternity

- 3 staff members on site are currently on maternity/paternity leave representing 1.4% of the workforce
- The regeneration proposals do not manifest in a way to impact on pregnancy and maternity and therefore this characteristic is potentially irrelevant to this EQIA.
- **From the evidence gathered there are no direct negative impacts from a pregnancy/maternity perspective**

## Sexual Orientation

- 4% of the workforce identified as being LGBTQ, although for 28% of the sample, business owners did not know
- The regeneration proposals do not manifest in a way to impact on a person's sexual orientation and therefore this characteristic is potential irrelevant to this EqIA
- **From the evidence gathered there are no direct negative impacts from a sexual orientation perspective**

## Religion/belief

- For 53% of the workforce sample a person's religion/faith was not known
- Of the remainder 22% were Christian, 7% Muslim and 6% stated they had no religion
- The regeneration proposals do not manifest in a way to impact on a person's religion/belief and therefore this characteristic is potential irrelevant to this EqIA
- **From the evidence gathered there are no direct negative impacts from a religion/belief perspective**

1.15 From the assessment above there are no direct negative equality impacts identified against any of the protected characteristics in respect of the SIW CPO. However, there are some protected characteristics who are likely to experience proportionately greater regeneration consequences of this proposal and these are:

- White other staff, including Eastern European, Turkish and Greek
- BAME Staff
- Female staff in businesses operating in properties in third party ownership
- Older members of the workforce potentially less able to re-engage in the labour market if their jobs are lost to the relocation programme

### Positive impacts

1.16 It is difficult to substantiate all the positive impacts to accrue from the CPO and the termination of leases on site to clear the site for the SIW. However, one way is to assess what is being proposed in Phase two of the scheme which will immediately follow the SIW. This is summarised by the following elements:

- Up to 2,300 new homes, of which 40% shall be affordable
- Option to provide a Hotel circa 250 rooms with up to 16,000 sqm
- Option to provide Purpose Built Student Accommodation (PBSA) and/or Large-Scale Purpose-Built Shared Living with up to 18,000sqm
- Up to 26,500 sqm of commercial workspace development
- Up to 2,000 sqm of retail
- Up to 5,500 sqm of social infrastructure and
- A three-form entry primary school.
- The associated works to create hard and soft landscaping, new public open spaces including equipped areas for play, sustainable drainage systems, car parking provision, and formation of new pedestrian and vehicular access.

### Mitigations

1.17 There are however some key mitigating actions that can be considered as options to apply some level of relief to these regeneration impacts. Indeed, some of these mitigations can be of more value for some protected characteristics than others. These are set out as recommendations for action below. When and where an action is directly related to the CPO, it is referred to in the EQIA Action Plan (Section 7) with specified timescales and costs. Other mitigation actions are general recommendations for the Council to consider in future proposals including those relating to the wider Meridian Water development.

### Generic Actions

- The council and its agents to continue to maximise their engagement with businesses on site; licensees, leaseholders and those in third party ownership, ensuring that information flows and that parties are aware of the proposals for the site (See Section 7).The council and its agents to continue to provide information for businesses within the CPO boundary about when they need to vacate the site, which for the majority of business will be pursuant to powers under the Landlord and Tenant Act. Also conversely to inform businesses outside the CPO boundary, the timescale when they will not be affected by wider regeneration plans (See Section 7).The council to monitor locations with suitable industrial designation for relocation potential through regular property reviews (see Section 7).
- The council to consider impact of development on staff likely to be affected by the possibility of redundancy in its marketing and promotion of new business space and targeting job opportunities (see Section 7). Indeed, the Borough has completed its Meridian Water Employment Strategy 2020 and it

may consider Phase 2 planning application Section 106 provisions to enact some of the strategies priorities.

### **Specific Equalities Targeted Actions**

- The council to support businesses with information on alternative locations within the Borough and adjacent Boroughs (Section 7). This may be beneficial to safeguard the workforce that is both local and that has limited capacity to travel to locations too far outside the borough. This will have a potentially beneficial impact on older members of the workforce who may find the potential of relocation difficult/impossible.
- The Council to consider social value and impact on local supply chain when procuring a contractor for construction, development or service.
- The Council to consider a clause in the development agreement/contract and to monitor for a workforce that is made up of a proportion of local people and for a workforce that reflects the racial profile of the borough/ward. This would require construction companies to record their workforce profile by relevant protected characteristics and to report on regular basis.
- The Council develop Business Employment and Skills Plans with tenants to ensure that job opportunities are actively targeted to residents in the Upper Edmonton ward, and the uptake by BAME communities is monitored and supported, (through measures such as pre employment training, Information advice and guidance, and use of local networks to disseminate job opportunities) (see Section 7).
- Safeguard the Council's commitment to Equality and Diversity and to support the council's commitment to address its general duties under the Equality Act 2010 (see Section 7):
  - For development and construction partners to implement effective equalities monitoring so that outcomes proposed can be verified and based on clear equalities evidence
  - To ensure all residential buildings' ease of access and use where possible (Part M of the Building Regulations)
  - To ensure that new infrastructure including roads, footpaths, cycleways, and bridges meet inclusive design standards where possible
  - To ensure that local communities and representative equality groups are invited to engage in the future design and planning consultation to ensure that all people can have a say in the future development of Meridian Water and that regeneration is best suited to the needs of local people.

## **2 The regeneration proposals for the Meridian Water**

- 2.1 Meridian Water comprises approximately 85 hectares in the south east of the Borough and is one of the largest developable areas in London. Located within the Central Leaside growth area and the Mayor of London's wider Upper Lee Valley Opportunity Area. The timescale for the full scale development of Meridian Water is 20 years.
- 2.2 The Council's strategy is to acquire all land required for the Meridian Water scheme and to use its compulsory purchase powers to this end. This is justified in its Statement of Reasons through the extensive social, economic and environmental benefits it would derive for the regeneration of this part of the borough.
- 2.3 The Council's planning policy supports the delivery of 5,000 new homes, 1,500 full time jobs, schools, community facilities, health services and open spaces, within a new character area. Over the full life of development there is an aspiration to deliver up to 10,000 new homes and associated development which would be supported through future planning policy.
- 2.4 The ambition for Meridian Water is to reshape an area that is currently an industrial and retail site, to provide new homes and to grow and diversify the local economy, creating job opportunities across the salary spectrum. It is believed that the further development of new and existing economic sectors can unlock economic growth and thousands of new jobs. Meridian Water will make the most of the opportunities offered by a new railway station (potentially incorporating Crossrail 2), and its location in the Upper Lee Valley and Lee Valley Regional Park.
- 2.5 The Strategic Infrastructure Works (SIW) are an essential element of the Scheme. They are required to enable the delivery of Phase 2 and the subsequent phases of development at Meridian Water. In summary, they comprise the construction of new roads, footpaths, cycleways and bridges, rail improvements, land remediation, new utilities and the diversion of existing utilities, and flood alleviation works.
- 2.6 The statement of reasons also states that only one business in Third Part Ownership that needs to be relocated as a result of the Order. The Council is in discussions with that business about possible options for relocation or compensation.
- 2.7 There are other businesses on the Orbital and Stonehill Business Parks, on the land owned by the council. These businesses are within the CPO red line but are already under the ownership of the council. These businesses will need to vacate the site to facilitate the SIW. These businesses lease their properties from the council under non-protected tenancies, with a mutual break in option enabling vacant possession of the site when the SIW commence.
- 2.8 Impacts on existing business not being relocated or outside the CPO boundary will be mitigated by the Council. This includes measures to minimise detrimental impact upon access for IKEA, and the Arriva Bus depot. The Council has also engaged in a significant programme of dialogue with existing business to understand and appropriately mitigate any effects during construction.

### 3 Summary of equalities evidence held by LB Enfield

- 3.1 This EQIA seeks to review the current CPO on the Meridian Water site to enable strategic infrastructure works to unlock the next phases of the scheme.
- 3.2 In any EQIA there is a need for equalities monitoring and set out below are some of the currently held data sets both for the borough and the Upper Edmonton ward and the research findings from businesses on the site and that are operating within the red line of the CPO.

#### Upper Edmonton Population Profile

- 3.3 Upper Edmonton Ward is situated in the south-east of the Borough, bordered by Haselbury and Edmonton Green wards to the north, Bowes Ward to the west and by the London Boroughs of Haringey and Waltham Forest to the south and east. It is covered by postal district N18.
- 3.4 This profile has been collated using the most up to date local-level data relating to 2018/19 as far as possible. A variety of statistical sources, both national and local, have been used in its compilation.

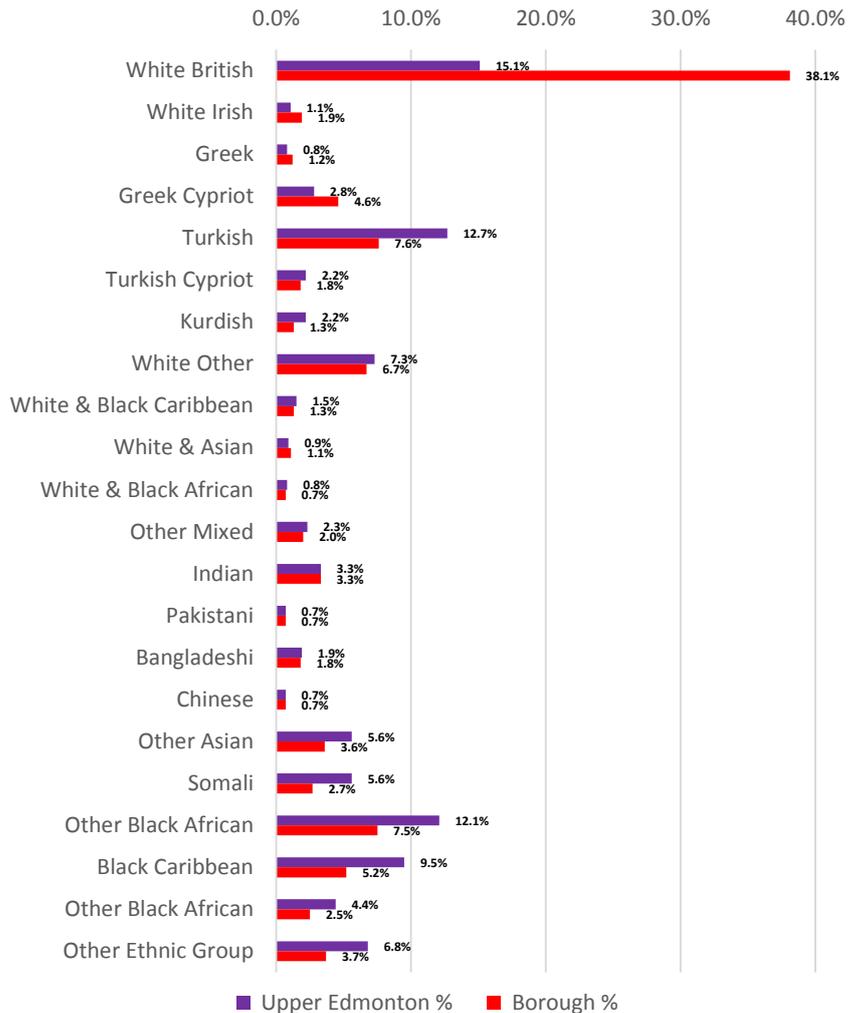
Table 2: Population Profile of Upper Edmonton

Measure	Upper Edmonton	Enfield	Source
Population Estimate (2018)	19,879	333,869	ONS mid-year estimates 2018
Children aged 0-15	5,174	76,366	ONS mid-year estimates 2018
Working-age people (16-64)	12,867	213,600	ONS mid-year estimates 2018
Older people aged 65+	1,838	43,903	ONS mid-year estimates 2018
% All Children aged 0-15	26.0%	22.9%	ONS mid-year estimates 2018
% All Working age (16-64)	64.7%	64.0%	ONS mid-year estimates 2018
% All Older people aged 65+	9.2%	13.1%	ONS mid-year estimates 2018
% BAME - 2018	55.9%	36.8%	Enfield Council Estimates 2018
% BAME - 2011	57.9%	39.0%	Census 2011
% Not Born in UK - 2011	48.4%	35.1%	Census 2011
% English is First Language of no one in household - 2011	22.7%	14.1%	Census 2011
Area - Square Kilometres	2.7	82.2	Ministry for Housing, Communities and Local Government
Population Density (People per sq km)	7,336	4,047	ONS mid-year estimates 2018/MHCLG

3.5 Upper Edmonton’s total population is estimated to be 19,879. This is the largest population of the 21 wards in Enfield. The population of Upper Edmonton Ward has increased by 14.4% since the 2011 Census, according to the latest estimate, which is higher than the average Enfield increase. The percentages of male and female residents in Upper Edmonton ward are 48.8% and 51.2% respectively. The ward contains a higher proportion of younger residents (children and adults under 44 years) than the Enfield average.

Chart 1: **Upper Edmonton and Enfield Ethnicity % Profiles 2018**

3.6 The ward contains relatively large numbers in the Turkish, Other Black African, Black Caribbean and Other Ethnic groups. As at the 2011 Census, the percentages of Black, Asian and Minority Ethnic Group (BAME) was 57.9% and Non-UK Born residents was 48.4%. The percentage of households without English as a first language was 22.7% Enfield Council’s own 2018 estimates give the ward’s BAME Group to be 55.9% of the total population.



3.7 The 2011 census identified that in Upper Edmonton the largest faith/religions groups was Christian with 50% of those included in the census, this is followed by 26.4% Muslim, 18.4% other, not stated or none.

3.8 In terms of socio-economic classifications, the 2011 Census results showed that Upper Edmonton had an above average proportion of people in routine occupations with about 23% more people than would be expected from the Borough average. Upper Edmonton residents are also underrepresented in managerial occupations.

3.9 Upper Edmonton had the 3rd lowest average (median) household income of the 21 wards in Enfield as estimated by CACI in 2019. Average household income in the ward is below the median level for the borough as a whole and lower than the

London average. The proportion of households with an income of less than £15,000 was put at 23.8% compared to a Borough average of 16.4%. This was the 3<sup>rd</sup> highest proportion of the 21 wards and higher than the London average.

- 3.10 With regards to benefit claimants, at November 2018 the number of people claiming the main working-age DWP benefits (including in-work benefits)<sup>3</sup> was 2,211 – 17.2% of the estimated working age population. This is compared to a Borough average of 15.1%. The estimated proportion of people in work or looking for work (the economically active) was lower than the borough average in 2011.
- 3.11 Analysis carried out by the Local Government Association indicates that, within Enfield, Upper Edmonton is the second most deprived of the 21 wards in the Borough. The same analysis estimates that it is among the 10% most deprived wards in England.

**Summary Findings from the Business survey 2020** (Detailed findings in Appendix 3)

- 3.12 Equality analysis of the survey captured responses from 75% of businesses within the CPO red line. This survey collected the protected characteristics of staff working in each business that responded to telephone and face to face interviews. The survey also gathered key data relating to business owners.

- The survey engaged 75% of businesses on site and 78% of units on site

Business Park Workforce

Across the 18 businesses that responded 218 people are employed on site:

- 188 are employed in units that were leased from LB Enfield and 30 were employed in a business that holds a third party ownership and thus who would be subject to the CPO<sup>4</sup>.
- Gender profile shows 155 men (71.1%) and 63 women (28.9%)
- There are no staff that were undergoing or who had undergone a transition
- 1.4% of staff employed on the site have a disability
- 45.0% of staff are aged between 22-34, the largest represented age groups, 32.2% aged 35-44, 15.0% aged 45-54, 4.4% were aged 55-64, 2.0% were aged 17-21 and 1.4% were over 65.
- 33.8% of staff were white British and thus 66.1% were from other racial groups

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<sup>3</sup> The benefits counted here are:

- Disability Living Allowance / Personal Independence Payment
- Incapacity Benefit / Severe Disablement Allowance
- Employment & Support Allowance
- Income Support (including Pension Credit for males aged 60 to 64)
- Jobseeker's Allowance
- Universal Credit

<sup>4</sup> In the case of this business the impact of the CPO is limited as that business would not need to leave the site, as the land to be compulsorily purchased is limited to the unit's forecourt.

- The ethnic minority population is made up of 33.4% White other, 2.8% mixed, 12.8% Asian/Asian British, 12.7% Black or Black British, and 4.5% other ethnic groups. The BAME population represents 33.0% of the workforce on site.
- Within the White Other profile 12.9% of staff on site are of 'other' eastern European origin, 8.0% are Polish, and 5.7% are either Turkish or Turkish Cypriot and 2.7% are either Greek or Greek Cypriot, 0.6% are Italian, and 3.4% are other.
- 67.9% of staff are heterosexual, 3.7% are LGBTQ and for 28.4% their sexual orientation was unknown
- For 52.8% of staff their religion/faith was unknown, of the remainder 21.7% are Christian, 6.7% are Muslim and 6.4% have no religion
- 1.4% of staff are on maternity/paternity leave.
- There was no data collected on Marriage/civil partnership status of the workforce as this characteristic was deemed to be irrelevant to the regeneration scheme
- 46.4% of staff were recorded as living in Enfield, 10.2% in Haringey, 7.5% in Waltham Forest and 7.5% in Barnet with 28.4% living further afield.
- 98.5% of the workforce had a 1 hour travel to work journey.
- 69.8% of staff are full time and 30.2% part time
- English is the main language spoken in all businesses but other languages are also spoken including Polish, Italian, Turkish and Gujarati
- 67% felt that their perceived impact would be mostly negative, 22% did not know and 11% felt that it was mostly positive (see 1.9 for more details)

#### Business Park Business ownership data

- 88.8% of business owners were male and 5.6% female and 5.6% institutionally owned
- No businesses were owned by a person with a disability
- 38.9% of businesses are owned by a person aged between 45-54, 16.7% are owned by people aged between 22-34, 35-44, 55-64 and 5.6% are owned by a person over 65 and 5.6 were unknown.
- 44.4% of business are owned by a person who is white British, 33.3% by a person who is white other, 16.7% by a person who is Asian and the remainder 5.6% by an institutional investor and hence the ethnicity was unknown.

3.13 A summary of the likely issues/concerns were raised by businesses regarding their perceptions of the impact of the proposals are set out below:

#### Suggested Negative impacts to the CPO for the SIW on site

- The majority felt it was negative because they had to leave the site through the termination of their lease and or the CPO
- Some felt the need for support in trying to find alternative locations from which to do their business
- Several indicated the potential loss of jobs for those working in their business in part because of the relocation impact on their current staff

- Some suggested they may need to close down.
- There were some who felt the move would cause a loss of storage
- Some felt the likelihood of higher cost of new premises
- Some stated they did not know about the likelihood of having to relocate and others felt they had a lack of awareness and or clarity about the proposals.

#### Likely Positive impacts to the CPO for the SIW on Site

- Many businesses understood the net benefits to the local area with the increased levels of housing and new industrial / business space and enhanced environment, connectivity, and infrastructure
- Some wanted to return to trade in the new development, with show rooms and their heavy industrial work to be done at other locations.
- Some felt that their business (construction training and employment) would be enhanced by the new development.

#### **Perceptions of the survey team**

3.14 In completing this survey, the Ottaway survey team drew some key perspectives through the survey which we deemed useful to report. These were:

- Employers were overall easy to engage with and spent time in considering their responses to questions
- Whilst recognizing the overall negative impact for their businesses, many recognized the benefits of regeneration
- There was general recognition that both Enfield and London have a massive housing shortage which regeneration can address
- Many felt that it would be useful to have further discussions regarding the timescale of the regeneration and that there was potential scope in establishing partnerships with businesses
- Some were unclear as to whether compensation was available, especially where significant investment had been made in capital equipment
- Some felt that not enough support was being provided
- There was a level of concern as to what will happen to members of the workforce when they relocate as some would be unlikely to find new jobs

#### **Note: Business concerns regarding their awareness of the scheme and engagement.**

3.15 It is clear from research that the Borough has worked with its agents to engage with businesses. Letters and site proposals and plans have been sent out to both those businesses in third party ownerships (freeholders) affected by the CPO and leaseholders on the site.

- A letter dated 7 May 2019 was sent to third party owners of business units, which included the offer to negotiate a price based on CPO compensation including disturbance, statutory loss payments and professional fees. Specifically, the letter addressed the project description, the purpose of the SIW, Timeframe, Negotiations and Purchase Price, and the way forward
- A letter was sent out in January 2020 to Council tenants on terminable interests. These letters state that these tenancies will be terminated by the

Council without compensation. Specifically, the letter addressed, the possible use of CPO, background, SIW, timeframe and the way forward.

## **4 Equality Impact Assessment**

4.1 This section incorporates analysis of key data to assess the regeneration proposals in light of the ways in which they may affect staff and owners of businesses that fall under the protected characteristics.

### **Aims of the proposal**

4.2 The Meridian Water regeneration scheme supports the delivery of 5,000 new homes, 1,500 full time jobs, schools, community facilities, health services and open spaces, within a new character area. Over the full life of development there is an aspiration to deliver up to 10,000 new homes and associated development which would be supported through future planning policy.

4.3 To release this development opportunity a CPO has been put in place to secure the site for the implementation of strategic infrastructure works (SIW).

4.4 To this end the EQIA will review the regeneration proposals under consideration and seek to assess plans in terms of their:

- Likely and actual benefits for the regeneration proposals
- Recognition of the negative impacts of the regeneration process
- An appraisal of impacts on staff in existing businesses with protected characteristics
- Assessment of the direct and indirect impacts of the regeneration programme and their proportional or disproportional distribution between different protected characteristics

### **Objective Justification for the Scheme**

- 4.5 The Statement of reasons for the CPO has made the case for the council to use its compulsory purchase powers to acquire the premises of the third party owned units on the site. This also sets out an objective justification for this regeneration scheme.
- 4.6 In short, the council has the powers through the Town and Country Planning Act 1990 to acquire land compulsorily in order to facilitate the carrying out of development, redevelopment, or improvement on or in relation to land in its area. Moreover, the proposals for SIW comply with existing and emerging local planning policy, the London Plan and the NPPF. To progress the regeneration of Meridian Water and to deliver further development the Council needs vacant possession of the site to secure both future investment and to fulfil the regeneration scheme and this cannot be achieved effectively by any alternative means.
- 4.7 In addition, the Council is satisfied that the Scheme is in accordance with the strategic objectives of the adopted planning framework in that it will contribute to the economic, social and environmental well-being of the area. The benefits to be accrued from the scheme are.
- 4.7.1 The SIW will contribute to the *economic well-being* of the Council's area by facilitating regeneration of Meridian Water. The main economic benefits will be:
- a Scheme value of c.£6bn
  - the creation of approximately 1,500 permanent jobs and thousands of jobs during construction with opportunities for apprenticeships for local people
  - increased economic activity by reason of increased employment and expenditure during construction phase of the Scheme; and
  - increased economic activity by reason of increased employment and expenditure during the operational phase of the Scheme and the introduction of expanded residential uses.
- 4.7.2 Promotion or improvement of *social well-being* will be achieved by:
- provision of new, well-designed, energy-efficient homes that will meet the needs of residents now and in the future
  - provision of up to 5,000 new homes with the potential for a further 5,000
  - the provision of c. 45% affordable housing on a habitable-rooms basis
  - shaping the new neighbourhood and giving it a distinct new character with high quality design led approach to planning applications guided by the ELAAP with a focus on open spaces and waterside living; and

- improved pedestrian, cycle and vehicular access links to improve permeability and to foster the creation of a healthy and safe community.

4.7.3 Promotion or improvement of *environmental well-being* will occur through enhancement of the townscape through the replacement of outdated buildings with a contemporary and well-designed residential development. The public realm will be improved, and heritage assets appropriately and respectfully treated within the Scheme. The main environmental benefits are:

- redevelopment of a brownfield site
- increased housing density appropriate to the increased and sustainable transport connectivity of the area due to the Meridian Water station, increased train service, increased bus capacity through the Central Spine consistent with the London Plan (adopted and emerging) and NPPF targets for optimising density
- creating new employment opportunities close to people's homes
- provision of efficient layouts and high quality public open space, community and recreational facilities.

- 4.8 In summary the Objective Justification for the removal of existing businesses from the site through the CPO and the termination of leases are to enable the council to commence the SIW, thus unlocking the Meridian Water Regeneration scheme. This would enable c£6bn of regeneration by developing a brownfield site and creating employment (permanent jobs and construction jobs) up to 5,000 new homes, schools, retail, health, transport links and enhancing the local environment.

#### **Relevance to the General Duty**

- 4.9 The potential impact of the CPO and the SIW will secure the future development of the Meridian Water Scheme. However, businesses and their staff will in the majority of cases have to vacate the site to allow this work to commence. This will have impacts and consequences to these businesses which need to be reviewed under the council's General Duty as set in the Equality Act 2010. Moreover, where feasible this EQIA will review the potential impact that this will have on particular protected characteristic and where feasible to address the likely proportional and or disproportional impacts that will result from the CPO and the SIW.
- 4.10 The table below sets out the key components of the regeneration programme as described in the Cabinet Report. It seeks to describe generic impacts of the regeneration proposals (CPO for the SIW) and to draw from that likely equality impacts.

#### **Regeneration activity, programme rationale, regeneration consequences and likely equality impacts.**

Activity planned	Programme Rationale	Regeneration consequences	Likely Equality impacts (Positive and Negative)
Demarcation of CPO area	This is central to assemble the development site and to commence investment required to unlock the Meridian Water scheme	<ul style="list-style-type: none"> <li>▪ The CPO highlights which business units are due to be included within the development red line area.</li> <li>▪ At present there are only 6 businesses that are affected by the CPO who are not in units owned by the council.</li> <li>▪ Those units owned by the council whilst within the CPO red line are on leases which have been given extension until the CPO phase is complete and until the site needs to be cleared for development</li> </ul>	<ul style="list-style-type: none"> <li>▪ This may have disproportionately negative impact on some businesses who have seen the development as 'forcing' them to move off the business parks</li> <li>▪ There is a general sense of stress, anxiety and disturbance for staff and business owners within the development red line area.</li> </ul>

Activity planned	Programme Rationale	Regeneration consequences	Likely Equality impacts (Positive and Negative)
Planning	Strategic Planning guidance	<ul style="list-style-type: none"> <li>▪ There is extensive strategic planning guidance which highlights Meridian Water as a strategic site for development both in Local and London wide plans</li> </ul>	<ul style="list-style-type: none"> <li>▪ The planning process itself should be equalities neutral</li> <li>▪ Residents of new homes and those accessing the new development and its infrastructure will benefit extensively</li> </ul>
CPO to enable the commencement of Strategic Infrastructure Works (SIW)	<p>The Strategic Infrastructure Works (SIW) are an essential element of the Scheme. They are required to enable the delivery of Phase 2 and the subsequent phases of development at Meridian Water. They comprise the construction of new roads, footpaths, cycleways and bridges, rail improvements, land remediation, new utilities and the diversion of existing utilities, and flood alleviation works</p>	<ul style="list-style-type: none"> <li>▪ There will be 6 businesses that will directly impacted on by the CPO. In most cases these businesses are only likely to lose a level of access to their site. There is however 1 business where they will lose their current site and thus will need to relocate.</li> <li>▪ There are 17 business occupying business units within the red line but they will be addressed as tenants of LB Enfield who have the Freehold interest in the Orbital and Stonehill Business Parks.</li> <li>▪ There will be 24 business that will need to vacate the site to enable the SIW to commence.</li> <li>▪ These businesses have been aware of the proposals as Meridian Water has been a site under consideration for many years.</li> </ul>	<ul style="list-style-type: none"> <li>▪ There are staff and owners that represent all protected characteristics.</li> <li>▪ Whilst the regeneration scheme is proposing the unlocking of the site through the CPO for SIW the impacts on staff are likely to be as a consequence of the regeneration per se rather than due to their protected characteristics.</li> <li>▪ The loss of jobs whilst not a direct Equality Impact is likely to have indirect impacts on those who suffer this consequence of the SIW CPO and termination of council leases for businesses occupying the site. This may have greater detriment for those older workers on site who may be less likely to re-engage in the labour market</li> </ul>

Activity planned	Programme Rationale	Regeneration consequences	Likely Equality impacts (Positive and Negative)
Generating the future outcomes of the scheme including the provision of increase housing	Council commitment to increase housing per se and social housing in particular	<ul style="list-style-type: none"> <li>▪ Increasing opportunities for those on the housing waiting list to access social housing in the borough</li> <li>▪ Benefits of enabling more people to access social housing. The waiting list is highly diverse with higher levels of people from ethnic minority communities and single parents on the housing waiting list</li> <li>▪ Future residents would be keen to see all new property built to lifetime homes standards, more energy efficient and with potentially less problems</li> </ul>	<ul style="list-style-type: none"> <li>▪ There are no people residing on the site, other than infrequent rough sleepers</li> <li>▪ The net gain for housing is likely to have benefits for people of all protected characteristics. (2,300 in Phase 2 with significantly more in future phases)</li> <li>▪ There is wide diversity of people on the borough's housing lists who will be supported through any social housing provided on the site.</li> </ul>
Socio economic growth and impact	Creation of employment on the future phases on the site.	<ul style="list-style-type: none"> <li>▪ There will be a range of infrastructural and employment opportunities arising out of phase 2 including:</li> <li>▪ Up to 26,500 sqm GEA of commercial workspace development</li> <li>▪ Up to 2,000 sqm GEA of retail</li> <li>▪ Up to 5,500 sqm GEA of social infrastructure and</li> <li>▪ A three-form entry primary school.</li> <li>▪ Additionally, the Phase 2 development is 'likely to support between 690-2,140 jobs are expected at the London scale, with 365-1,415 at the pan-Borough scale (defined as Enfield + Waltham Forest + Haringey)</li> </ul>	<ul style="list-style-type: none"> <li>▪ The benefits of this employment growth will be positive and will likely be impacting on all protected characteristics.</li> <li>▪ From a pure numbers' perspective, the loss of employment on the site (based on 75% response rate) is likely to be up to 300 staff. However, this will be outweighed by new employment post Phase 2 of the development of between 365-1,415 jobs at the pan-Borough scale.</li> </ul>

## Meridian Water SIW CPO Equality Impact analysis in summary

- 4.11 As part of this analysis and for each characteristic this EQIA has indicated the type of impact (i.e. positive, negative, positive and negative, none, or unknown). This EQIA seeks to explain these impacts. Data and evidence collected including from surveys has been incorporated.

### Ethnicity: EQIA Findings

#### Context:

- 4.11.1 Enfield has one of the highest ethnic minority populations in the country (61.9% in 2018 compared to 20% in England in 2011). The borough has a white other population of 25.1%, a Black, African/Caribbean/Black British population of 17.9% compared to England at 3%, an Asian/Asian British population of 10.1% compared to England at 8% and a 3.7% other ethnic group population compared to England at 1% and a mixed ethnic group of 5.1% compared to 2% in England. Upper Edmonton has a higher level again (84.9% ethnic minority). The business within the Meridian Water business parks had an ethnic minority population of 66.1%, larger than the borough but lower than upper Edmonton. The profile of was 33.9% White British, White other was 33.4%, Black and Asian categories were 12.7% each, mixed 2.8% and other ethnic groups came to 4.5%.

#### Racial profile of the Site

- 4.11.2 The business survey shows that the racial profile of the site to be 66.1% ethnic minority and 33.0% BAME. Hence the staff working within the red line of the CPO represent strong levels of racial diversity. This is broken down in the table below:

Table 3: Ethnic minority profile of the Workforce on site

Ethnic profile of the workforce	All Units		Council Leases		Third Party Owned	
	Count	%	Count	%	Count	%
White: British	74	33.9%	70.6	37.6%	3	10.0%
Other White	73	33.4%	48.8	26.0%	24	80.0%
Mixed/multiple ethnic group	6	2.8%	6.1	3.2%	0	0.0%
Asian/Asian British	28	12.7%	28	14.9%	0	0.0%
Black/African/Caribbean/Black British	28	12.7%	24.6	13.1%	3	10.0%
Any other ethnic group	10	4.5%	9.9	5.3%	0	0.0%
Prefer not to say	0	0.0%	0	0.0%	0	0.0%
Total	218	100%	188	100.0%	30	100.0%
Ethnic Minority Profile	144	66.1%	117	62.4%	27	90.0%
BAME Profile	72	33.0%	69	36.5%	3	10.0%

- 4.12 The white British population at 33.9% is the largest racial category, although only just, with the White other racial category with 33.4%. The proportions of Asian and Black members of the workforce was the same at 12.7%. There are clear differences in the workforce profile of council leased units and Third Party owned units. However only one business from a Third Party owned unit responded to the survey. Indeed, this business employs high levels of White other employees (80%) and as per the table below 50% are Eastern European, 30% are Polish, and 20% are Turkish or Turkish Cypriot.
- 4.13 Enfield has a large white other population 25.1% based on 2018 data sets. The White other profile of staff within the businesses that responded to the survey was 33.4% which is clearly higher. The table below shows how this group of staff is broken down. 38.6% of staff are of 'other' eastern European origin, 23.9 are polish, and 17.2% are either Turkish or Turkish Cypriot and 8.2% are either Greek or Greek Cypriot. However, the column in the table titled '% all ethnicities' shows how these ethnic groups fit into the overall sample. To this end the Eastern European proportion of the workforce represent 12.9% of the sample, Polish represent 8.0%, Turkish and Turkish Cypriot represent 5.7% and Greek/Greek Cypriot represent 2.8%, other 3.4% and Italian 0.6%.

Table 4: White Other Sub-profile of staff within responding businesses.

White Other profile of the workforce	All Units			Council Leases		Third Party Owned	
	Count	% White Other	% all ethnicities	Count	%	Count	%
Greek	5	6.8%	2.3%	5	10.1%	0	0.0%
Greek Cypriot	1	1.4%	0.5%	1	2.2%	0	0.0%
Turkish	10	13.9%	4.6%	8	15.8%	2	10.0%
Turkish Cypriot	2	3.3%	1.1%	0	0.0%	2	10.0%
Italian	1	1.9%	0.6%	1	2.9%	0	0.0%
Polish	17	23.9%	8.0%	10	20.9%	7	30.0%
Other Eastern European	28	38.6%	12.9%	16	33.0%	12	50.0%
Other	7	10.2%	3.4%	7	15.2%	0	0.0%
Total	73	100%	100.0%	49	100.0%	24	100.0%

### Assessment

- 4.13.1 The likely negative regeneration consequences for those on site, with a requirement to vacate their units either through the termination of their council lease or the CPO is real for these businesses. However, their departure will have a consequentially beneficial impact for the wider community and future uses on the site, in that the development of Meridian Water will be unlocked and this will have greater benefits going forward and many of these benefits will be experience with ethnic diversity.
- 4.13.2 As can be seen from the data above, the diversity of the staff in businesses currently operating within the site is strong. A critical factor is the need to

minimise the amount of negative impact i.e. loss of jobs. This will be inevitable particularly given the requirement for businesses to leave the site. Some businesses have indicated that they may want to return to the site once the scheme had been developed, however this is likely to be a longer time in the future and in the interim businesses will still need to vacate the site.

- 4.13.3 The data tells us that there are more people employed in the site from White Other backgrounds (predominantly Eastern European, Polish and Turkish). The CPO will have a greater impact on White Other staff than others. It is not inevitable that there will be job losses although this is a potential issue if they are unable to relocate their business. To this end the council may want to prepare to prioritise actions that would support those who may experience a negative consequence of this regenerations scheme and particularly to assess the needs of the white other population who seem to proportionally more likely to be affected.
- 4.13.4 From the evidence gathered there are no direct negative impacts of the CPO from a race perspective. However, there are proportionally higher numbers of ethnic minority staff that are exposed to possible business relocation/job losses and thus the following potential forms of mitigation should be considered.

**Potential mitigation actions:**

- The Council to consider a clause in the development agreement/contract and to monitor for a workforce that is made up of a proportion of local people and for a workforce that reflects the racial profile of the borough/ward. This would require construction companies to record their workforce profile by relevant protected characteristics and to report on regular basis.
- The Council develop Business Employment and Skills Plans with tenants to ensure that job opportunities are actively targeted to residents in the Upper Edmonton ward, and the uptake by BAME communities is monitored and supported, (through measures such as pre employment training, Information advice and guidance, and use of local networks to disseminate job opportunities).
- For the Council and development and construction partners to implement effective equalities monitoring so that outcomes proposed can be verified and based on clear equalities evidence.

## Gender: EQIA Findings

### **Context**

- 4.13.5 Enfield's gender split is 49% male and 51% female. The percentages of male and female residents in Upper Edmonton ward are 48.8% and 51.2% respectively.

### **Gender profile of the site**

- 4.13.6 Based on the business survey carried out the gender profile of the site indicated that there were 155 men (71.1%) and 63 women (28.9%) working in the businesses that responded to the survey. The profile for those working in businesses with council leases was 80.3% male and 19.7% female and for those working in businesses in units under third party ownerships was 13.3% male and 86.7% female.

### **Assessment**

- 4.13.7 There is a clear suggestion from the survey that the majority of the workforce within the site are men and this corresponds to the kinds of industrial uses and businesses operating with the site.
- 4.13.8 A critical factor is the need to understand the impact of businesses moving away from the site on both men and women and their respective abilities to move to new business premises to continue their employment.
- 4.13.9 From the evidence available there are no direct negative impacts of the CPO from a gender perspective and plans are broadly consistent for both genders. However, there will be inevitable indirect impacts of business relocations and the possibility of job losses which are likely to be applied equally between male and female members of the workforce. It will be subject to the departing businesses finding a suitable venue to recommence their work and one where the workforce can manage to travel to.
- 4.13.10 There are proportionally higher numbers of women working in businesses affected by the CPO with 86.7% staff in the one business that responded that are in this category. This business operates in the textile and clothing industry and the women on site are predominantly machine operators. Moreover, this business will however not need to relocate as their CPO interest relates simply to their forecourt.

### **Potential mitigation actions:**

- 4.13.11 The Council develop Business Employment and Skills Plans with tenants to ensure that job opportunities are actively targeted to residents in the Upper

Edmonton ward, and the uptake by BAME communities is monitored and supported, (through measures such as pre employment training, Information advice and guidance, and use of local networks to disseminate job opportunities).

### Gender re-assignment: EQIA Findings

#### Context:

- 4.13.12 Borough wide data for people going through or having gone through a transition is not available.

#### Gender re-assignment profile of the estate

- 4.13.13 There were no staff in any businesses surveyed that were undergoing or who had undergone a transition.

#### Assessment

- 4.13.14 It is arguable whether trans-gender is relevant to the CPO to support this regeneration scheme.
- 4.13.15 From the evidence gathered there are no direct negative impacts of the CPO from a gender re-assignment perspective.

### Disability: EQIA Findings

#### Context:

- 4.13.16 The most reliable data to quantify the level of the disabled population in any area is that from the 2011 Census. The question asked in the Census was: Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months? Subsequent estimates are produced by applying the rates of disability by age to the latest population projections. For Enfield this results in a total disabled population at mid-2018 of 52,101 (15.61%)<sup>5</sup>

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<sup>5</sup> <https://new.enfield.gov.uk/services/your-council/borough-and-wards-profiles/borough-profile-2019-your-council.pdf>

**Disability profile of the site**

- 4.13.17 Based on the business survey carried out the disability profile of the site indicated that there were 3 members of the workforce with a disability representing 1.4% of the total workforce.
- 4.13.18 The regeneration proposals do not manifest in a way so as to impact particularly on disabled people. Assessments suggests that the impacts on Disabled people are equality neutral. It could be argued that the disturbance of moving from the site may have a disproportionately greater impact on disabled workers, although this will need to be addressed by individual businesses.

**Future mitigation opportunities**

- 4.13.19 To ensure all residential buildings' ease of access and use where possible (Part M of the Building Regulations).

**Age: EQIA Findings****Context:**

- 4.13.20 There are proportionately more children and young people under 20 in Enfield than in both London and England overall. Enfield has a higher proportion of adults aged 20 to 44 years than the England average, but a significantly lower proportion than in London on average. Unsurprisingly, London attracts more adults of younger working age than any other part of the country. Despite the increase in the percentage of over 65s in Enfield, this proportion is still lower in Enfield than in England overall in all age bands from 65-69 to 90+<sup>6</sup>.

**Age profile of the workforce on the site**

- 4.13.21 The age profile of staff working for businesses engaged through this survey showed that 45% were aged between 22-34, the largest represented age group, this was followed by 32% 35-44, 15% 45-54, 4% were aged 55-64, 2% were aged 17-21 and 1% were over 65.
- 4.13.22 The regeneration proposals for the site will require those businesses with expired leases and those within the CPO to vacate the site. Any

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<sup>6</sup> <https://new.enfield.gov.uk/services/your-council/borough-and-wards-profiles/borough-profile-2019-your-council.pdf>

consequential regeneration impact will apply itself to all members of staff irrespective of their age.

- 4.13.23 The Regeneration proposals do not manifest in a way so as to impact on age. Thus, the assessment finds that there are no direct negative impacts identified from an age perspective.
- 4.13.24 However, there was a view from some businesses owners that older members of the workforce may find it more difficult to find work should they need to as a result of the business moving away from the site. This concern may require mitigating actions.

**Potential mitigation actions:**

- The council to support businesses with information on alternative locations within the Borough and adjacent Boroughs (Section 7). This may be beneficial to safeguard the workforce that is both local and that has limited capacity to travel to locations too far outside the borough. This will have a potentially beneficial impact on older members of the workforce who may find the potential of relocation difficult/impossible
- The council to develop Business Employment and Skills Plans with tenants to ensure that job opportunities are actively targeted to residents in the Upper Edmonton ward, and the uptake by BAME communities is monitored and supported, (through measures such as pre employment training, Information advice and guidance, and use of local networks to disseminate job opportunities).

## Sexual Orientation: EQIA Findings

**Context:**

- 4.13.25 There is only a limited amount of information on sexual orientation of the general population available. There are national survey samples that have generated a series of estimates. Therefore, assuming and applying those estimates to Enfield's population of 333,869, the LGB population in Enfield may be anywhere between around 6,677 (National estimate) and 8,681 (London estimate) by the ONS Annual Population Survey Estimate and to around 33,387 according to the Stonewall estimate. With 2,777 estimated to be males and 1,534 estimated to be females<sup>7</sup>

**Sexual orientation profile of the workforce on the site:**

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<sup>7</sup> <https://new.enfield.gov.uk/services/your-council/borough-and-wards-profiles/borough-profile-2019-your-council.pdf>

- 4.13.26 Based on the business survey carried out; 68% of staff were heterosexual and 4% were LGBTQ and the sexual orientation of 28% was unknown.

**Assessment:**

- 4.13.27 From a regeneration perspective the impacts are likely to be applied equally to both the heterosexual staff population as to the LGBTQ staff populations.
- 4.13.28 The regeneration proposals do not manifest in a way to impact on a person's sexual orientation and therefore this characteristic is irrelevant to this EQIA.
- 4.13.29 From the evidence gathered there are no direct negative impacts of the CPO from a sexual orientation perspective

## Religion and belief: EQIA Findings

**Context:**

- 4.13.30 Data for religion in Enfield is sourced from the 2011 Census. This states that Christianity is the most common religion in the borough in all its different forms (53.58%). 16.69% of residents are of the Muslim faith, and 15.53% hold no religion or belief at all.

**Religion and belief profile of the workforce on the site:**

- 4.13.31 From the business survey it was clear that, for the majority of staff working on site, their religion and or faith was unknown (53%), and of those that were known 22% are Christian, 7% are Muslim and 6% have no religion.

**Assessment:**

- 4.13.32 There were no discernible negative impacts, raised by businesses through the survey, which were seen to be a result of religion and beliefs.
- 4.13.33 The regeneration proposals do not manifest in a way to impact on a person's religion/belief and therefore this characteristic is potential irrelevant to this EQIA.
- 4.13.34 From the evidence gathered there are no direct negative impacts of the CPO from a religion/belief perspective.

### Pregnancy and maternity: EQIA Findings

#### Context:

- 4.13.35 The pregnancy/maternity profile was based on those staff identified by business managers and owners as being on maternity or paternity leave, this is a proxy measurement of pregnancy and maternity. However, it was something that it was felt would elicit an understanding of the proportions who are in this protected characteristic. From the responses given 3 members of staff (1.4%) of the sample were described as being on maternity or paternity leave.

#### Assessment:

- 4.13.36 There is little evidence that there will be any direct or indirect equality impacts on the grounds of pregnancy and maternity. There are no direct negative impacts identified from a Pregnancy/Maternity perspective.

### Marriage & Civil Partnership: EQIA Findings

#### Context:

- 4.13.37 The council recognises gay relationships and civil partnerships with respect to household composition. In the context of a business environment and from the perspective of the workforce within the site that are no known negative impacts on these groups.
- 4.13.38 There was no data collected on Marriage/civil partnership status of the workforce as this category was deemed to be irrelevant to the regeneration scheme.

#### Assessment

- 4.13.39 Details about the marriage and or civil partnership status of those working on the site are not known.
- 4.13.40 The regeneration proposals do not manifest in a way to impact on the grounds of Marriage or civil partnership and therefore this characteristic is potentially irrelevant to this EQIA.
- 4.13.41 From the evidence gathered there are no direct negative impacts from a marriage/civil partnership perspective.

**Language: EQIA Findings****Context:**

- 4.13.42 The impact of the regeneration proposals on staff who do not speak English as a primary language is unknown. However, the business survey identified that all businesses engaged spoke English as their main business language. There were staff that spoke other languages, and the research reported Polish, Italian, Turkish and Gujarati. It is likely that other languages are also spoken particularly given the diversity of the workforce.

**Assessment**

- 4.13.43 Language, on its own, is not likely to have any significant equality impacts as a result of the regeneration programme itself other than the ability to communicate and understand the implications of the regeneration process as it applies to different businesses. However, given that all business managers and owners engaged spoke English and that they stated that all used English as their main business, language this is unlikely to present any negative impacts.

## 5 Summary of Key Findings

- 5.1 Meridian Water is a major regeneration scheme, of regional and sub-regional significance. To secure this scheme the LB Enfield are undertaking a CPO to enable the completion of strategic infrastructure works (SIW) on the site. This is not the first CPO the borough has used in securing the Meridian Water development and this is likely not to be the last.
- 5.2 The SIW will enable development of, the Central Spine Road, Leaside Link Road, Brooks Park and River 'Naturalisation', Edmonton Marshes and Flood Alleviation Works, Access Works, Earthworks, Remediation, Utilities and other ancillary works and Rail enhancement works.
- 5.3 Prior to the commencement of the SIW the Council needs to have unencumbered access to the site so that these works can commence. The CPO is in place to acquire the business units which are held in third party ownership. The Council is also the freeholder of the Orbital Business Park and the Stonehill Business Park, and its units are occupied by the businesses under non-protected tenancies.
- 5.4 From a regeneration impact perspective, the CPO of the Site, is critical and will potentially unlock the development and hence enable the wider investment into Meridian Water and thus progress to the Phase 2 Master Plan.

### Generic Regeneration consequences

- 5.5 Clearly from this action there will be consequential impacts on the businesses on the site who will have, in time, to vacate the site and find new locations in which to carry out their trades. This will have impacts both on the businesses themselves and clearly the staff and owners of these businesses. These impacts are direct consequences of this regeneration activity. From the research undertaken these are seen by the majority of businesses as negative impacts to their businesses many of which have traded from the site for many years.
- 5.6 The purpose of this EQIA has been to establish the extent to which these negative regeneration impacts have implications on those within this development site from an equality and diversity perspective.
- 5.7 What seems clear is that these impacts are not directly negative from a purely equality perspective. Indeed, staff and business owners from all protected characteristics will equally experience indirect negative impacts as a consequence of this regeneration activity. For example, if businesses must relocate then this would be applied to all their workforce irrespective of their protected characteristics. If a business were to close down this would apply to the owner and their workforce irrespective of their protected characteristics. If jobs were to be lost that would be irrespective of the protected characteristics of these employees.
- 5.8 It is important to consider this CPO in a context of the wider regeneration scheme. Land assembly is critical to unlocking Meridian Water development. Looking to the proposals for Meridian Water there is an argument that there will be significant future beneficiaries to the regeneration of the site. Clearly there will be many people who

will benefit from the scheme in terms of housing, employment, leisure and amenity space and the appropriate infrastructure needed to support the potentially huge growth in the population. These numbers are hard to substantiate but will be extensive. Moreover, it is likely that these beneficiaries will be from all protected characteristics. Whilst an EQIA is not a purely numbers based exercise it is clear that the regeneration impacts felt by those currently occupying the site will be significantly outweighed by the volume of future beneficiaries. Equally it is critical that in pursuit of its General Duty the Council will want to ensure that the future regeneration of the Meridian Water Site will procure positive equality outcomes benefiting the whole community and to have due regard for the needs of all protected characteristics both in the design, development, construction and end use of the homes, offices, community buildings, infrastructure and services that will operate on the new site.

- 5.9 From the equality monitoring undertaken, this EQIA has identified a workforce where there is strong racial diversity with 66% being from ethnic minority communities, a 70%-30% male/female gender split, an age profile that shows 92% are aged between 22 and 54 years of age and a disability profile that shows 1.4% of the workforce. A fuller understanding of other protected characteristics is limited as many business managers and owners are not fully aware of their workforce make up against faith, sexual orientation, and marriage and civil partnership. The level of pregnancy and maternity show 1.4% of the workforce are taking maternity leave.
- 5.10 There were additional elements of data that show that the workforce working on the site are predominantly local with 46% living in Enfield, and 72% living both in the borough and within the immediate neighbouring boroughs. Moreover, the travel to work time for the workforce on site shows that 16% took less than 30 minutes and 82% took between 30 minutes and 1 hour. This suggests that the workforce on the site is predominantly local. It would also appear that if businesses were to want to retain their workforce, they would prefer to identify a site for relocation that was local to the area rather than to move further afield say outside the M25. Indeed, some businesses were keen to relocate to the new development if and when the opportunity arose.
- 5.11 It is critical that these needs are understood when working with businesses going forward to support their move from the site and to simply understand the needs that their workforce present.

### **Positive impacts**

- 5.12 It is difficult to substantiate the positive impacts to accrue from the CPO and the termination of leases on site to clear the site for the SIW. However, one way is to assess what is being proposed in Phase two of the scheme which will follow the SIW. This is summarised by the following elements:
- Up to 2,300 new homes (Use Class C3), of which 40% shall be affordable
  - Option to provide a Hotel (Use Class C1) circa 250 rooms with up to 16,000 sqm GEA (allowing for a range of specification from budget to luxury)

- Option to provide Purpose Built Student Accommodation (PBSA) and/or Large-Scale Purpose-Built Shared Living (LSPBSL) (Sui Generis) with up to 18,000sq m GEA in total
- Up to 26,500 sqm GEA of commercial workspace development (Use Class B1a, b, c)
- Up to 2,000 sqm GEA of retail (Use Class A1 and/or A2 and/or A3 and/or A4)
- Up to 5,500 sqm GEA of social infrastructure (Use Class D1 and/or D2); and
- A three-form entry primary school.
- The associated works to create hard and soft landscaping, new public open spaces including equipped areas for play, sustainable drainage systems, car parking provision, and formation of new pedestrian and vehicular access.

5.13 Another way is to review the environmental impact and the effects of the scheme. In 2019 ARUP completed their Environmental statement for the site and in particular for the next phase immediately after the SIW. To this end a set of clear positive impacts were identified. The table below summarises some of the health and socio-economic impacts.

Table 5: Effects of the of the Proposed development grouped by receptor/area<sup>8</sup>

Area	Positive Effect/Impact
Health	Health significant beneficial effects on health arising from: <ul style="list-style-type: none"> <li>• increased access to affordable housing</li> <li>• effects on mental and physical health resulting from new employment opportunities. Effects are likely significant depending on how many of the jobs are taken up by local people.</li> <li>• changes to social capital. Effects are likely to be beneficial but dependent on the quality and timing of measures introduced to encourage social cohesion and build social capital.</li> </ul>
	Effects on health resulting from changes in exposure to air emissions, crime and antisocial behaviour; noise impacts; provision of community facilities and access to education and training would not be significant
	Health effect arising from reduced access to green space would be minor-moderate adverse and therefore significant
Socio-economic	Significant beneficial effects on housing for existing and future residents resulting from delivery of 2,300 new homes including affordable housing and community cohesion resulting from new employment opportunities, mix of uses, good residential mix and new improved public spaces
	Effects from the proposed development on educational provision, play space provision and social infrastructure provision would be not significant
	Effects from the proposed development on open space provision

<sup>8</sup> Environmental Statement June 2019 ARUP

Area	Positive Effect/Impact
	would be adverse as open space would not meet the threshold with respect to local plan policy, however, effects are assessed as not significant as the Proposed Development includes proposals to improve quality and access to Tottenham Marshes to the immediate south of the site and an area of the Lee Valley Regional Park to the north-east.
	There is likely to be between 690-2,140 jobs are expected at the London scale, with 365-1,415 at the pan-Borough scale (defined as Enfield + Waltham Forest + Haringey)

- 5.14 From an equalities perspective it is most likely that these regeneration benefits will be shared across all protected characteristics.

### **Mitigations**

- 5.15 There are however some mitigating actions that can be considered as options to apply some level of relief to these regeneration impacts. Indeed, some of these mitigations can be more impactful for some protected characteristics than others. When and where an action is directly related to the CPO, it is referred to in the EQIA Action Plan (Section 7) with specified timescales and costs. Other mitigation actions are general recommendations for the Council to consider in future proposals including those relating to the wider Meridian Water development.

### **Generic mitigation activity**

- The council and its agents to continue to maximise their engagement with businesses on site; licensees, leaseholders and those in third party ownership, ensuring that information flows and that parties are aware of the proposals for the site (Section 7). The council and its agents to continue to provide information for businesses within the CPO boundary about when they need to vacate the site, which for the majority of business will be pursuant to powers under the Landlord and Tenant Act. Also conversely to inform businesses outside the CPO boundary, the timescale when they will not be affected by wider regeneration plans (See Section 7). The council to monitor locations with suitable industrial designation for relocation potential through regular property reviews (see Section 7).
- The council to consider impact of development on staff likely to be affected by the possibility of redundancy in its marketing and promotion of new business space and targeting job opportunities (see Section 7). Indeed, the Borough has completed its Meridian Water Employment Strategy 2020 and it may consider Phase 2 planning application Section 106 provisions to enact some of the strategies priorities.

### **Equalities targeted mitigation activity**

- The council to support businesses with information on alternative locations within the Borough and adjacent Boroughs (Section 7). This may be beneficial to safeguard the workforce that is both local and that has limited

capacity to travel to locations too far outside the borough. This will have a potentially beneficial impact on older members of the workforce who may find the potential of relocation difficult/impossible.

- The Council to consider social value and impact on local supply chain when procuring a contractor for construction, development or service.
- The Council to consider a clause in the development agreement/contract and to monitor for a workforce that is made up of a proportion of local people and for a workforce that reflects the racial profile of the borough/ward. This would require construction companies to record their workforce profile by relevant protected characteristics and to report on regular basis.
- The Council develop Business Employment and Skills Plans with tenants to ensure that job opportunities are actively targeted to residents in the Upper Edmonton ward, and the uptake by BAME communities is monitored and supported, (through measures such as pre employment training, Information advice and guidance, and use of local networks to disseminate job opportunities) (see Section 7).
- Safeguard the Council's commitment to Equality and Diversity and to support the council's commitment to address its general duties under the Equality Act 2010 (see Section 7):
  - For development and construction partners to implement effective equalities monitoring so that outcomes proposed can be verified and based on clear equalities evidence,
  - To ensure all residential buildings' ease of access and use where possible (Part M of the Building Regulations),
  - To ensure that new infrastructure including roads, footpaths, cycleways and bridges meet inclusive design standards where possible.

To ensure that local communities and representative equality groups are invited to engage in the future design and planning consultation to ensure that all people can have a say in the future development of Meridian Water and that regeneration is best suited to the needs of local people.

## 6 Mitigation Recommendations

### Recommended Action

6.1 Set out below are the key recommended mitigation actions as identified by EQIA.

### Generic Actions

- The council and its agents to continue to maximise their engagement with businesses on site; licensees, leaseholders and those in third party ownership, ensuring that information flows and that parties are aware of the proposals for the site (See Section 7). The council and its agents to continue to provide information for businesses within the CPO boundary about when they need to vacate the site, which for the majority of business will be pursuant to powers under the Landlord and Tenant Act. Also conversely to inform businesses outside the CPO boundary, the timescale when they will not be affected by wider regeneration plans (See Section 7). The council to monitor locations with suitable industrial designation for relocation potential through regular property reviews (see Section 7).
- The council to consider impact of development on staff likely to be affected by the possibility of redundancy in its marketing and promotion of new business space and targeting job opportunities (see Section 7). Indeed, the Borough has completed its Meridian Water Employment Strategy 2020 and it may consider Phase 2 planning application Section 106 provisions to enact some of the strategies priorities.

### Specific Equalities Targeted Actions

- The council to support businesses with information on alternative locations within the Borough and adjacent Boroughs (Section 7). This may be beneficial to safeguard the workforce that is both local and that has limited capacity to travel to locations too far outside the borough. This will have a potentially beneficial impact on older members of the workforce who may find the potential of relocation difficult/impossible.
- The Council to consider social value and impact on local supply chain when procuring a contractor for construction, development or service.
- The Council to consider a clause in the development agreement/contract and to monitor for a workforce that is made up of a proportion of local people and for a workforce that reflects the racial profile of the borough/ward. This would require construction companies to record their workforce profile by relevant protected characteristics and to report on regular basis.
- The Council develop Business Employment and Skills Plans with tenants to ensure that job opportunities are actively targeted to residents in the Upper Edmonton ward, and the uptake by BAME communities is monitored and supported, (through measures such as pre employment training, Information

advice and guidance, and use of local networks to disseminate job opportunities) (see Section 7).

- Safeguard the Council's commitment to Equality and Diversity and to support the council's commitment to address its general duties under the Equality Act 2010 (see Section 7):
  - For development and construction partners to implement effective equalities monitoring so that outcomes proposed can be verified and based on clear equalities evidence,
  - To ensure all residential buildings' ease of access and use where possible (Part M of the Building Regulations),
  - To ensure that new infrastructure including roads, footpaths, cycleways and bridges meet inclusive design standards where possible.

To ensure that local communities and representative equality groups are invited to engage in the future design and planning consultation to ensure that all people can have a say in the future development of Meridian Water and that regeneration is best suited to the needs of local people.

## 7 Action Plan

- 7.1 The EqIA was completed in March 2020. Its assessment was that there were no direct negative equality impacts identified against any of the protected characteristics in respect of the SIW CPO. Nonetheless it identified that there were some protected characteristics who are likely to experience proportionately greater regeneration consequences of this proposal. To address these consequences of the SIW CPO, Council staff reviewed the mitigating actions set out in section 6 and the following action has been proposed for implementation.
- 7.2 It should be noted that the EQIA reports contains more mitigation actions apart from those listed below, as general recommendations for the Council to consider in future proposals including those relating to the wider Meridian Water development

Ref	Identified Issue	Action Required	Lead officer	Timescale/By When	Costs	Review Date/Comments
<b>MW EQIA 20.1</b>	The need to maintain and intensify the information flow to business impacted on by the SIW and CPO on the Meridian Water site	The council and its agents to continue to maximise their engagement with businesses on site; licensees, leaseholders and those in third party ownership, ensuring that information flows and that parties are aware of the proposals for the site.	<b>MW Lead on Meanwhile Uses / Land Acquisition</b>	<b>Ongoing</b>	<b>Within existing budgets</b>	<b>CPO notices to be served in Q2 2020 with accompanying information: Qualifying parties to be served with Statutory Notices. Article on CPO to be included in summer Meridian Water newsletter</b>
<b>MW EQIA 20.2</b>	Need to ensure that Business impacted by the SIW CPO are informed of when they need to vacate from the site with sufficient notice to aid business planning	The council and its agents to continue to provide information for businesses within the CPO boundary about when they need to vacate the site, which for the majority of business will be pursuant to powers under the Landlord and Tenant Act. Also, conversely to inform	<b>MW Lead on Meanwhile Uses / Land Acquisition</b>	<b>Ongoing</b>	<b>Within existing budgets</b>	<b>November 2020</b>

Ref	Identified Issue	Action Required	Lead officer	Timescale/By When	Costs	Review Date/Comments
		businesses outside the CPO boundary, the timescale when they will not be affected by wider regeneration plans				
<b>MW EQIA 20.3</b>	Some businesses may request support in identifying alternative sites for relocation.	The council to monitor locations with suitable industrial designation for relocation potential through regular property reviews. This to be undertaken either in Council or through Council's Property agent. The council to support businesses with information on alternative locations within the Borough and adjacent Boroughs.	<b>CPO Officer</b>	<b>Ongoing</b>	<b>Under £10,000 for market bulletin (subject to market testing).</b>	<b>Half yearly market bulletin to inform of alternative locations.</b>
<b>MW EQIA 20.4</b>	Possibility of a loss of business unit operating at the site which is in third party ownership.	To agree measures to mitigate against disruption. To progress negotiations.	<b>CPO Surveyor</b>	<b>Ongoing</b>	<b>CPO budget</b>	<b>Ongoing</b>
<b>MW EQIA 20.5</b>	Need to safeguard the council commitment to Equality and Diversity and to support the council's commitment to address its general duties under the Equality Act 2010.	Specify key equality actions to support the future use of the CPO site including to:  The delivery of the CPO and implementation of the wider scheme will have regard to the following equality duties and commitments: <ul style="list-style-type: none"> <li>For development and construction partners to implement effective equalities monitoring so that outcomes proposed can be verified and based on clear equalities evidence</li> </ul>	<b>MW Lead on Employment, MW Lead on Design, MW Socio-economic Lead</b>	<b>Ongoing</b>	<b>Case by case</b>	<b>Ongoing</b>

Ref	Identified Issue	Action Required	Lead officer	Timescale/By When	Costs	Review Date/Comments
		<ul style="list-style-type: none"> <li>• The marketing and promotion of new business space to have specific regard to engaging ethnic minority and BAME businesses within the Borough</li> <li>• To develop Business Employment and Skills Plans with tenants to ensure that job opportunities are actively targeted to residents in the upper Edmonton wards, and the uptake by BAME communities is monitored and supported, (through measures such as pre employment training, Information advice and guidance, and use of local networks to disseminate job opportunities).</li> <li>• To ensure all residential buildings' ease of access and use where possible (Part M of the Building Regulations)</li> <li>• New infrastructure including roads, footpaths, cycleways, and bridges to meet inclusive design standards where possible</li> <li>• That local communities and representative equality groups are invited to engage in the future design and planning consultation to ensure that all people can have a say in the future development of Meridian Water and that regeneration is best suited to the needs of local people.</li> </ul>				



## 8 Appendix 1: Key Definitions

### Key Definitions

#### 8.1 **Diversity** equals difference:

The concept of diversity encompasses acceptance and respect. This means understanding that every person, family and group in the Enfield Estates Regeneration project is unique and has specific needs. The skill when offering services to individuals and groups is to take account of these characteristics sensitively and positively throughout this project.

#### 8.2 **Equality** is the concept of knowing when to 'treat people the same' in this regeneration project and when to 'treat them differently'.

Often, we have policies, guarantees and standards which guide us to treat people the 'same' so that they receive their entitlements. But regularly in 2019 we are also faced with challenges to deliver individualised and tailored housing services to individuals, families and groups. The skill is to know when 'sameness or difference' applies and having a rationale to explain your actions.

#### 8.3 **Inclusion** has been described as a sense of belonging.

A feeling of being respected, valued for who you are; feeling a level of support and commitment from others who consult and negotiate with you over important matters, so that your voice is heard as a tenant, leaseholder or owner of a property and you can then help, shape and make important decisions.

#### 8.4 **Human Rights** are the basic rights and freedoms that belong to all of us from birth until death. Our right to live, eat, be clothed and to be respected for private and family life.

The act protects ordinary people's freedom, safety and dignity and helps us hold authorities to account when things go wrong. In Britain, these important international rights are protected by the Human Rights Act of 1998, which is now enshrined as part of UK domestic laws.

#### 8.5 **Ethnic Minority**: is defined as people who differ in race or colour or in national, religious, or cultural origin from the dominant group of the country in which they live. For the purposes of this EQIA ethnic minority is used where people have not been defined as White British.

#### 8.6 The acronym **BAME** stands for Black, Asian and Minority Ethnic and is **defined** as all ethnic groups except White ethnic groups

## **9 Appendix 2: Equality Impact Assessments, introduction and context**

9.1 This Equality Impact Assessment (EQIA) has been commissioned as an independent report by LB Enfield's Regeneration team and it will focus on the key elements of the Strategic Infrastructure Works proposed for the Meridian Water site. It will address the equality impacts of:

- The proposals and master plan for Meridian Water
- The Compulsory Purchase Order (CPO)
- The requirement to move businesses off site to enable the Strategic Infrastructure Works, including those that have leases on units owned by LB Enfield
- The profile of the businesses and staff currently working in the site

### **What is an Equality Impact Assessment for?**

9.2 The Council must have due regard to its Public Sector Equality Duty (PSED) when making decisions at member and officer level. An EQIA is the best method by which the Council can provide the evidential analysis to comply with the equality duty, particularly for major decisions. However, the level of analysis required should only be proportionate to the relevance of the duty to the service or decision. Some decisions will require detailed equalities consideration, e.g. a decision on adult social care provision or reduction of grants to voluntary organisations, whereas the performance of other functions will have less of an equalities impact, e.g. the appointment of committees where only a limited assessment is required. In rare cases, the Courts have said there may be no impact.

9.3 In the context of this regeneration programme a full independent Equality Impact Assessment has been deemed appropriate.

### **Equality Act 2010**

9.4 The LB Enfield - like all other public must meet the public sector equality duty (s.149, Equality Act 2010) which requires the Council, when exercising its functions, to have "due regard" to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited under the Act,
- advance equality of opportunity between those who share a "protected characteristic" and those who do not share that protected characteristic and
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it (this involves having due regard, in particular, to the need to (a) tackle prejudice, and (b) promote understanding).

9.5 These are collectively referred to in this EQIA as the equality aims. Advancing equality (the second equality aim) involves having due regard, in particular, to the need to:

- Removing or minimising disadvantages suffered by people due to their protected characteristic
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people including steps to take account of disabled people’s disabilities *and*
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low

NB, for disabled persons, the Council must have regard to the possible need for steps that amount to positive discrimination, to “level the playing field” with non-disabled persons, e.g. in accessing services through dedicated car parking spaces.

**Equality Impact Assessments**

9.6 This EQIA broadly adopts the borough’s model for EQIAs set by the borough’s equalities policy leads. However, like most other authorities, Enfield’s EQIAs are a self-assessment tool to help look at the likely positive and negative impacts of the borough’s work on staff, citizens, partners and communities regarding equality of opportunity, and promoting diversity in employment and service delivery.

9.7 Enfield is one of the most diverse boroughs in the country and equalities is expressed through an ambition of fairness and the guiding values of equal opportunity and social justice. The protected characteristics and Enfield’s priority characteristics are set out below. Each of these protected characteristics were deemed relevant and appropriate will be assessed in this EQIA.

Chart 2: Protected Characteristics Equality Act 2010 + 3 additional Characteristics



9.8 The Equalities Impact Assessment will cover the following areas in the context of the council's general duty to:

- Address identified barriers
- Eliminate discrimination
- Promote equality of opportunity
- Promote good relations between different people
- Support employment opportunities
- Secure inclusive design

9.9 From a methodological perspective, the EQIA will focus on addressing:

- Likely regeneration programme impacts.
- Likely / expected equality impacts.
- Direct equality impacts.
- Indirect equality impacts.
- Proportionality of impact across protected characteristics/local characteristics including proportion and disproportional, thereby assessing proportional positive impacts and negative impacts and/or disproportional positive and negative impacts.
- As part of this process it is critical to enable the council to assess what it will undertake to address the outcomes of these assessments.
- This analysis will enable a process of prioritising these impacts, which will enable Enfield the opportunity to choose options for the mitigation of negative impacts accordingly.

## 10 Appendix 3: Equalities and regeneration policy consideration local, regional and national

10.1 This appendix sets out the core policy position for this Equality Impact Assessment and strategic policies and planning documents that would impact on the Strategic Infrastructure Works for the Meridian Water site.

### **Enfield Equality Policy<sup>9</sup>**

10.2 The policy states that, 'The Council will work towards equality of opportunity for all and will devote its energies and resources to the achievement of this aim'.

10.3 The Council will not discriminate on grounds of age, colour, disability, ethnic origin, gender, HIV status, immigration status, marital status, social or economic status, nationality or national origins, race, faith, religious beliefs, responsibility for dependents, sexual orientation, gender identity, pregnancy and maternity, trade union membership or unrelated criminal conviction. The Council will promote equality of access and opportunity for those within the community who suffer from unfair treatment on any of these grounds including those disadvantaged through multiple forms of discrimination.

10.4 The Council will strive to eliminate all forms of discrimination. The Council recognises that this requires not only a commitment to remove discrimination but also action through positive policies to redress the inequalities produced by past discrimination.

10.5 The policy recognises the Council's General duty to

- promoting equal opportunity for all
- opposing all forms of discrimination, intolerance and disadvantage by reducing inequalities that limit people's life chances
- making sure our workforce reflects the diverse communities of Enfield at all levels
- providing inclusive, accessible and excellent services to all

10.6 The borough's policy statement applies to all nine protected equality characteristics under the Equality Act 2010:

- age
- disability
- gender
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief

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<sup>9</sup> <https://new.enfield.gov.uk/services/your-council/about-equality-and-diversity-in-enfield/equality-and-diversity-information-valuing-diversity-and-equal-opportunities-policy-2012.pdf>

- sex and sexual orientation

10.7 The Policy states that the council will:

- review and improve our services regularly to make sure they respond to the needs of all parts of the community, making particular efforts to involve the usually under-represented groups
- take action on issues of major importance to the diverse communities who make up Enfield's population
- prepare and adopt service strategies that properly address the needs of traditionally under-represented groups
- improve access to the Council's services by providing appropriate information, translation and interpreting services, induction loops, minicom facilities, training of relevant staff and adaptation of buildings
- lead, train and encourage staff and elected members to become responsible for the achievement of equality of opportunity in their services and portfolios
- ensure that the specifications for contracted out or purchased services require contractors and sub-contractors to meet the needs of all sections of the community and monitor their performance to ensure that they do
- as an aid to the improvement of service quality, take steps to ensure that the workforce of each service better reflects the composition of the local community, and
- monitor and evaluate the effectiveness of all our services in meeting the needs of all parts of the community.

10.8 As an employer the Council will

- take action to ensure that the Council comes to be seen as a more attractive and safer place in which to work by all parts of the community, and as an employer of choice
- make sure that all parts of the community are aware of Council job opportunities
- introduce policies and practices that better reflect the needs of the under-represented groups, for example, in relation to the care of dependents
- regularly monitor the composition of the workforce to ensure that there is fairness in its employment policies and practices, and to establish the nature of positive action to redress imbalances as required. This will include recruitment, promotion, training opportunities, pay, grievances and exit from employment
- make further efforts to ensure that recruitment and selection procedures lead to the appointment of the best person for the job.
- ensure that employee development and training policies for all employees give fair and equitable attention to the needs of under-represented groups,
- continue to take determined action to ensure that employees are protected from all forms of harassment.

- 10.9 The Council will seek to promote a more effective "voice" for traditionally under-represented groups by
- setting up new means of consultation and involvement in the Council's decision-making that are more appropriate to their needs. This will be reflected in the Council's Engagement Framework and the Sustainable Community Strategy
  - developing existing means of consultation and involvement
  - advocating their views to other key bodies that have significant effects on their lives
  - encouraging groups to express their own views and promoting opportunities for them to do so
  - working to ensure that all parts of the community have an equal opportunity to vote in local and national elections, and
  - discussing issues of under-representation with the local political parties responsible for nominating candidates.
- 10.10 In its relationship with other bodies and interests in the Borough, the Council will
- recognise and value the diversity that exists in the voluntary and community sector
  - work to redress the disadvantage created by past discrimination
  - ensure equal access to the Council's support through grant aid and in other ways
  - seek to ensure equal access to other sources of funding and support
  - ensure that the bodies supported by the Council through grant aid and in other ways have effective equal opportunities policies
  - take action to ensure that the talents of traditionally under-represented groups are developed to the full, and
  - work to ensure that the particular aspirations and needs of under-represented groups are understood and acted upon
- 10.11 The Council will also act in appropriate ways to encourage understanding and co-operation between the various parts of the community.

### **Compulsory Purchase Order (CPO)**

- 10.12 Compulsory purchase powers are provided to enable Acquiring Authorities to compulsorily purchase land to carry out a function, which Parliament has decided is in the public interest. Anyone who has an interest in land acquired is generally entitled to compensation. Local authorities have CPO powers under the Acquisition of Land Act 1981, the Town and Country Planning Act 1990 and other specific Acts of Parliament in order to promote development and regeneration and for other public purposes.
- 10.13 The CPO process comprises a number of stages, including Decision to make a CPO, Public Inquiry (if objection to the CPO), Decision, Implementation and Assessment/Payment of Compensation stages. The acquiring authority does not have the powers to implement the compulsory acquisition of land until the CPO is

confirmed by the relevant Government Minister. However, they can acquire by agreement at any time and the general presumption is that they should endeavour to do so before acquiring by compulsion.

### **Statement of reasons<sup>10</sup>**

- 10.14 The Council's Statement of Reasons for the use of its compulsory purchase powers is based on the scheme's contribution to the social, economic and environmental well-being of the area.
- 10.15 The SIW will contribute to the *economic well-being* of the Council's area by facilitating regeneration of Meridian Water. The main economic benefits will be:
- a Scheme value of c.£6bn
  - the creation of approximately 1,500 permanent jobs and thousands of jobs during construction with opportunities for apprenticeships for local people
  - increased economic activity by reason of increased employment and expenditure during construction phase of the Scheme; and
  - increased economic activity by reason of increased employment and expenditure during the operational phase of the Scheme and the introduction of expanded residential uses.
- 10.16 Promotion or improvement of *social well-being* will be achieved by:
- provision of new, well-designed, energy-efficient homes that will meet the needs of residents now and in the future
  - provision of up to 5,000 new homes with the potential for a further 5,000
  - the provision of c. 45% affordable housing on a habitable-rooms basis;
  - shaping the new neighbourhood and giving it a distinct new character with high quality design led approach to planning applications guided by the ELAAP with a focus on open spaces and waterside living; and
  - improved pedestrian, cycle and vehicular access links to improve permeability and to foster the creation of a healthy and safe community.
- 10.17 Promotion or improvement of *environmental well-being* will occur through enhancement of the townscape through the replacement of outdated buildings with a contemporary and well-designed residential development. The public realm will be improved, and heritage assets appropriately and respectfully treated within the Scheme. The main environmental benefits are:
- redevelopment of a brownfield site
  - increased housing density appropriate to the increased and sustainable transport connectivity of the area due to the Meridian Water station, increased train service, increased bus capacity through the Central Spine

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<sup>10</sup> London Borough of Enfield Meridian Water Strategic Infrastructure Works Compulsory Purchase Order – Statement of Reasons

consistent with the London Plan (adopted and emerging) and NPPF targets for optimising density

- creating new employment opportunities close to people's homes
- provision of efficient layouts and high quality public open space, community and recreational facilities.

10.18 For the above reasons, the well-being tests set out in Section 226(1A) of the 1990 Act are fully satisfied in respect of the CPO as made and submitted for confirmation.

### **National Planning Policy Framework**

10.19 The National Planning Policy Framework July 2018 ("NPPF") sets out the Government's planning policies for England and how these are expected to be applied. It is a material consideration in planning decisions. The NPPF confirms that the development plan continues to be the starting point for the determining the acceptability of development. There is a presumption in favour of sustainable development, which the NPPF identifies as having three overarching objectives, namely economic, social and environmental. The development of Meridian Water will meet the economic, social and environmental objectives and the relevant policies are:

- In relation to economic objectives the NPPF supports the building of a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right paces and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.
- In relation to social objectives the NPPF supports strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.

10.20 In terms of housing supply, Paragraph 59 states: "To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

10.21 Paragraph 119 of the NPPF states that Local Planning Authorities should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development, using the full range of powers available to them. This should include identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers, where this can help to bring forward more land for meeting development needs and/or secure better development outcomes.

### **Enfield Local Plan 2018 to 2032<sup>11</sup>**

- 10.22 The Council's emerging growth vision is to deliver transformational change, unlocked through strategic infrastructure investments. The key aim is to reduce inequality to regenerate deprived neighbourhoods for the benefit of local residents, to promote development along key growth corridors and to enhance the borough's rich resource of green and blue infrastructure - which includes parks, river valleys, gardens, street trees, canals and more.
- 10.23 The council's local plan provides a framework for how the area will take shape over the coming years. The Plan covers major issues including housing, jobs and community facilities. This Local Plan will have a major influence on the borough's priorities up to 2032. The plan identified that the borough needs to plan for:
- A population of more than 400,000 people by 2032
  - Up to 2,300 new homes per year till then
  - 20 primary and 32 secondary forms of entry by 2029
  - 65,000M2 of retail by 2029
  - Over 13,000 jobs by 2036
  - Extra infrastructure facilities including utilities and transport
- 10.24 To address this need, the Local Plan is proposing to:
- Develop at Existing Green Belt Settlements; Settlements within the green belt existed long before the green belt was formed in the 1950s. Is there potential for development in these areas?
  - Develop Town Centres; Concentrating development within town centres and existing built up areas through better use of this space
  - Develop at Transport Hubs and Growth Areas: Focusing development within the growth corridors such as Upper Lee Valley and around transport nodes such as around stations on the Piccadilly Line and other rail routes.
  - Develop Industrial Land; Development of redundant or poorly sited industrial land or locations where regeneration benefits outweigh alternatives.

### **The Upper Lee Valley Opportunity Area Planning Framework (ULVOAPF)<sup>12</sup>**

- 10.25 The Upper Lee Valley Opportunity Area Planning Framework (ULVOAPF) (adopted July 2013) covers c. 3,900 hectares shared between the London Boroughs of Enfield, Haringey, Waltham Forest and Hackney. The headline objectives for the Upper Lee Valley include:
- Over 15,000 new jobs by 2031
  - Over 20,100 new well designed homes by 2031

<sup>11</sup> <https://new.enfield.gov.uk/services/planning/enfield-draft-local-plan-2036-planning.pdf>

<sup>12</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/opportunity-areas/opportunity-areas/upper-lee-valley>

10.26 The OAPF sets out eight objectives:

- Growth at Tottenham Hale, Blackhorse Lane, Meridian Water in Central Leaside and Ponders End
- Optimised development and redevelopment opportunities along the A10/A1010 Corridor, in particular the Tottenham High Road Corridor and Northumberland Park
- Over 15,000 new jobs by 2031 across a range of industries and a green industrial hub creating greater learning and employment opportunities
- Over 20,100 new well designed homes by 2031
- Full integration between the existing communities and the new jobs, homes and services provided as part of the new developments
- A Lee Valley Heat Network linked to the Edmonton Eco Park
- Significant investment and improvements to transport infrastructure, including four trains per hour on the West Anglia Main Line and improvements to help people walk and cycle more easily through the area
- A fully accessible network of green and blue spaces which open up the Lee Valley Regional Park. The networks between them will be improved benefitting both people and wildlife

10.27 Meridian Water, roughly in the centre of the Opportunity Area and at the junction of three London Boroughs, is identified as a Growth Area. Chapter 7.2 specifies the following principles for Meridian Water:

- Realising the scale of opportunity and the opportunity of scale,
- Delivering 5,000 new homes, and
- Facilitating economic growth: delivering at least 3,000 new jobs of varied types.

10.28 The ULVOAPF is currently being updated.

### **Edmonton Leaside Area Action Plan Jan 2017<sup>13</sup>**

#### A New Urban Neighbourhood

10.29 Delivering new homes and employment opportunities are key priorities for Enfield Council. At Meridian Water the council has a once in a lifetime opportunity to build a community for everyone through the transformation of derelict brownfield land. The riverfront location, combined with far better transport links, including a new railway station, will help to make Meridian Water a new and vibrant part of London. New shops and cafes, schools, community facilities and leisure facilities, with better access to the Lee Valley Regional Park, will make this a highly desirable place to live, work and spend time.

10.30 Development at Meridian Water will provide thousands of high quality new homes and jobs at the heart of the Upper Lee Valley. This new neighbourhood will be an

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<sup>13</sup> <https://new.enfield.gov.uk/services/planning/edmonton-leaside-area-action-plan-planning.pdf>

inclusive development and a well-integrated extension of Edmonton. The wider community will share in the new resources, including retail, leisure, educational, community and health facilities. There will be improved access to the waterways and parklands of the Lee Valley as well as new employment opportunities, ensuring that the positive benefits of the regeneration and investment reach beyond Meridian Water's boundaries.

#### Economic Growth

- 10.31 There will be ongoing development in growth sectors of the economy including the creative, digital media, e-commerce and software industries. Businesses will find a stimulating and attractive home at Meridian Water which will attract regional, national and international investors to deliver thousands of new jobs across the area. Employment training opportunities will be secured for local residents.
- 10.32 Edmonton Leaside's intensified industrial estates will be successful and thriving, supporting economic growth, innovation and enterprise. Their locational advantage within the Upper Lee Valley and the London-Stansted-Cambridge corridor will enhance the competitiveness of the borough, bringing growth and prosperity for its businesses and people.

#### Connectivity

- 10.33 The creation of a more frequent, resilient and flexible rail service will enable significant development and regeneration within the entire Lee Valley, resulting in huge transformation at Edmonton Leaside. A new station, Meridian Water (formerly Angel Road) will operate a four-train per-hour service, rising later to an eight train-per-hour rail service. The expected -tracking or Crossrail 2 schemes will provide additional capacity to support further growth and regeneration. This increased service will result in improved accessibility and attractiveness of the area as a place to live, work and visit.
- 10.34 A new road – the Causeway – will provide a strong, attractive and welcoming spine route through Meridian Water, allowing new access and connecting a previously fractured site. New bridges and linkages will open up this part of the borough and increase access to the Lee Valley Regional Park.
- 10.35 Residents, employees and visitors will benefit from a network of routes for walking and cycling, connecting Edmonton Leaside to the rest of the borough and beyond. The existing cycle path, the Greenway link from Meridian Water to Edmonton Green, will be extended as a key walking and cycling route.

#### Employment

- 10.36 The Upper Lee Valley contains London's second largest reservoir of industrial employment land, classified as SIL (Strategic Industrial Sites) or LSIS (Locally Significant Industrial Locations). The majority of the industrial estates are well used and have limited vacancies, which suggest high demand for sites and premises. Enfield is London's second largest waste management and recycling hub and

contains Edmonton EcoPark, a sub-regional facility that is one of London's largest recycling and sustainable waste management facilities. Green industries and advanced manufacturing are important sources of employment locally and growth sectors in London and Enfield<sup>2</sup>. Food and drink manufacturing businesses are also significant employers in Edmonton Leaside<sup>3</sup>.

### **Enfield Economic Development Strategy 2020-2030**

- 10.37 This includes an objective of diversifying and intensifying employment uses in industrial areas to attract higher quality employment to the borough. The strategy identifies the loss of 26,000 sq.m. of office accommodation within the borough through permitted development since 2013 and the need to provide an additional 24,000 sq.m. required up to 2036.
- 10.38 31% of businesses reporting that their premises cannot support additional jobs. Key actions on Inward investment and supporting businesses relate to the Council utilising its property portfolio to increase the availability and diversity of workspace and of working closely with business and training providers to ensure residents are equipped with the skills needed to take advantage of future roles.

### **The Meridian Water Employment Strategy Feb 2020**

- 10.39 The Meridian Water Employment Strategy sets out Enfield Council's approach to employment for the next 20-25 years. It is the council's ambition that Meridian Water will deliver 6,000 new high-quality jobs, 1,000 meanwhile employment uses and 1,000 construction related jobs.

#### **Outcomes:**

- Outcome 1) Create 6,000 permanent, high quality jobs paying London Living Wage or above, of which no less than 25% will be from local labour
- Outcome 2) Deliver 1,000 new high-quality jobs through Meanwhile Employment Uses on land intended for redevelopment, where possible rehoming these businesses within the new development
- Outcome 3) Enabling local Enfield employers to Supply Meridian Water, starting with its construction, with no less than 10% of all investment benefiting local employers
- Outcome 4) Deliver 1,000 construction jobs, sustained over 25 years, of which no less than 25%<sup>14</sup> will be from local labour

<sup>14</sup> This is the minimum percentage expected through Section 106 planning obligations

- 10.40 The current site is designated as Strategic Industrial Land (IL) and there is a mix of employment-generating activities including transport and storage, wholesale, manufacturing, construction, utility and retail. The current employment profile of the working population is dominated by low skilled and low payed roles in transport, distribution, industrial processing and big box retail.
- 10.41 The economic impact of Meridian Water is summarised below:

### Summary

- Meridian Water is in the Upper Edmonton ward, which has a number of challenges around deprivation: household income, part time employment and low skills.
- Meridian Water presents an opportunity to reshape Enfield's economy, generating thousands of higher-quality new jobs and driving prosperity in the local area
- Meridian Water has the key ingredients to deliver a step change in the local economy, including development scale, regeneration and placemaking, accessibility, local leadership and investment.
- Evidence established in the Edmonton Leaside Area Action Plan (ELAAP) demonstrates that Meridian Water can achieve significant employment growth and with the right approaches to land use and design, 6,000 jobs or more could be achieved, but densities require significant office and research footprints to deliver this target.
- Transformational change at Meridian Water requires a shift in the economic base away from big box retail and distribution, toward higher value sectors with denser job yields, such as office/serviced office and small studio spaces.
- The profile of change in the borough demonstrates that Meridian Water is well placed to capitalise on significant growth around micro businesses, office and research activities and the public sector.

- 10.42 A key outcome is the enablement of local Enfield employers to Supply Meridian Water, starting with its construction, with no less than 10% of all investment benefiting local employers.

### Summary

- The development will generate £3.9 Billion of investment, with the target being to secure 10% or £390 million of contracts through local employers
- This is regionally significant development with substantial benefit to the local economies of Enfield and adjacent boroughs
- All major capital works contracts will have obligations to optimise their use of the local supply chain
- The value of the contracts will help Enfield Business to grow, supporting additional employment within the borough

- 10.43 A further key outcome is the delivery of 1,000 construction jobs, sustained over 25 years, of which no less than 25%<sup>15</sup> will be from local labour

### Summary

- Over 1,000 construction jobs will be sustained every year over a 25-year period
- 25% or 250 local jobs per year of employment will go to Enfield Residents, or residents of adjacent boroughs
- The duration and geography of employment enables significant delivery of work-based apprenticeships that benefit local people
- Build Enfield, the vehicle for these job opportunities will be developed to support local people into work over a 25-year period
- A construction skills strategy with Construction Trades profiling will be produced to support the ongoing upskilling of the local community to ensure local benefit

## London-wide policy

### London Plan

- 10.44 The new London Plan was adopted with amendments in March 2016. The Plan includes strategic and planning policies to encourage equal life chances for all, in recognition of social inequalities existing within the city. A number of policies outlined in the Plan are relevant to the proposed regeneration, including tackling deprivation, promoting equality and enabling different groups to share in the benefits of development, specifically:

#### Policy 2.9

- Inner London Strategic planning requires that Boroughs and other stakeholders should work to realise the potential of London in ways that sustain and enhance its recent economic and demographic growth while also improving its distinct environment, neighbourhoods and public realm, supporting and sustaining existing and new communities, addressing its unique concentrations of deprivation, ensuring the availability of appropriate workspaces for the area's changing economy and improving quality of life and health for those living, working, studying or visiting there.

#### Policy 2.13

- This refers to "opportunity areas" that have been identified on the basis that they are capable of accommodating substantial numbers of new homes and employment and seeks to ensure the area's potential is optimised. The Upper Lee Valley (in which Meridian Water is situated) is identified in the London Plan, as an opportunity area. In October 2015, the GLA designated Meridian Water one of 20 new, Housing Zones in London, unlocking funding

<sup>15</sup> 25% local labour is the target sought through Section 106 planning obligations on new developments

for key infrastructure and enabling works, including the station, remediation and boulevard.

Policy 3.1

- 'Ensuring Equal Life Chances for All' requires that development proposals should protect and enhance facilities that meet the needs of particular groups and communities. The plan does not support proposals involving loss of these facilities without adequate justification or provision for replacement.

Policy 3.2

- 'Improving Health and Addressing Health Inequalities' is also relevant, requiring due regard to be had to the impact of development proposals on health inequalities in London.

Policies 3.17 - 3.19

- Concerning the provision of social infrastructure, including health and social care, education, sports and recreation facilities, are all relevant to equal opportunities.

Housing policies 3.3 - 3.16

- Concerning housing provision, affordable housing provision, mixed and balanced communities, housing choice and provision of associated play facilities, are all relevant to equal opportunities.

Policy 4.12

- Improving Opportunities for all requires that strategic development proposals should support local employment, skills development and training opportunities. The Plan notes continuing large inequalities in access to jobs and levels of worklessness, with Londoners from Black, Asian and Minority Ethnic (BAME) groups more than twice as likely to be unemployed as those from White groups.

Policy 7.1

- Lifetime Neighbourhoods policy for development which enables people to live healthy active lives, and maximises opportunity for community diversity and inclusion, and the design of places that meet the needs of the community at all stages of people's lives.

10.45 The London Plan suggests Major Centres should have Borough-wide catchment areas and are typically smaller than metropolitan centres. These centres may have developed sizeable catchment areas and normally have over 50,000 m<sup>2</sup> of retail floor space.

### **Equal Life Chances for All, the Mayor's equality strategy revised in June 2014<sup>16</sup>**

- 10.46 Equal Life Chances for All, the Mayor's equality strategy revised in June 2014 sets out priorities for achieving equality across a range of dimensions. It emphasises enabling the most vulnerable and disadvantaged people to benefit from London's success; supporting deprived communities, vulnerable people and promoting community cohesion; supporting businesses to consider social issues in their corporate planning to bring real change to people's quality of life; increasing the levels of employment of excluded groups; and decreasing the difference in income between the equality groups and others from deprived communities and the wider community.

### **Draft London Plan<sup>17</sup>**

- 10.47 The London Plan is the statutory Spatial Development Strategy for Greater London prepared by the Mayor of London ("the Mayor") in accordance with the Greater London Authority Act 1999 (as amended) ("the GLA Act") and associated regulations.
- 10.48 The legislation requires the London Plan to include the Mayor's general policies in respect of the development and use of land in Greater London and statements dealing with general spatial development aspects of his other strategies. The Mayor is required to have regard to the need to ensure that the London Plan is consistent with national policies. When published in its final form the Plan will comprise part of the statutory development plan for Greater London.
- 10.49 The current 2016 Plan<sup>18</sup> is still the adopted Development Plan, but the Draft London Plan is a material consideration in planning decisions. The significance given to it is a matter for the decision maker, but it gains more weight as it moves through the process to adoption.
- 10.50 Information about the Mayor's planning functions, including the preparation and content of the London Plan, is set out in the London Planning Statement Supplementary Planning Guidance published in May 2014.
- 10.51 A draft new London Plan was published by the Mayor for consultation in December 2017. The consultation period ended on Friday 2<sup>nd</sup> March. Greater London Authority officers are currently registering all representations received and preparing a report which will summarise the main issues.
- 10.52 In accordance with section 338 (3) of the GLA Act, the Secretary of State has appointed a Panel to conduct an examination in public ("EIP") of the London Plan. The Mayor may suggest changes to the draft London Plan in response to the

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<sup>16</sup> Mayor of London (Revised 2014) *Equal Life Chances for All* [online] available at:

[https://www.london.gov.uk/sites/default/files/equal\\_life\\_chances\\_for\\_all.pdf](https://www.london.gov.uk/sites/default/files/equal_life_chances_for_all.pdf)

<sup>17</sup> <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan>

<sup>18</sup> [\*\*The London Plan consolidated with alterations since 2011\*\*](#)

representations received, issues and questions raised by the Panel, or discussions at the EIP.

10.53 The plan states:

10.53.1 This London Plan is different to those that have gone before it. It is more ambitious and focused than any previous London Plans. The concept of Good Growth – growth that is socially and economically inclusive and environmentally sustainable – underpins the London Plan and ensures that it is focused on sustainable development.

10.53.2 This London Plan takes a new approach. It plans for growth on the basis of its potential to improve the health and quality of life of all Londoners, to reduce inequalities and to make the city a better place to live, work and visit. It uses the opportunities of a rapidly-growing city to plan for a better future, using each planning decision to improve London, transforming the city over time. It plans not just for growth, but for Good Growth – sustainable growth that works for everyone, using London’s strengths to overcome its weaknesses.

10.53.3 To ensure that London’s growth is Good Growth, each of the policy areas in this Plan is informed by the six Good Growth policies:

- Policy GG1 Building strong and inclusive communities
- Policy GG2 Making the best use of land
- Policy GG3 Creating a healthy city
- Policy GG4 Delivering the homes Londoners need
- Policy GG5 Growing a good economy
- Policy GG6 Increasing efficiency and resilience

10.54 In this context the Meridian Water Scheme seeks to meet these six Good Growth Priorities.

## **11 Appendix 4: Findings from the Business survey 2020**

- 11.1 This survey was specifically designed for this EQIA and was agreed with LB Enfield to ensure that the relevant and appropriate equality characteristics were captured. The survey was carried out over the phone with businesses between the 5<sup>th</sup> March and the 11<sup>th</sup> March 2020. A site visit had been undertaken previously on 24<sup>th</sup> February 2020.
- 11.2 The businesses targeted were those within the CPO red line and included businesses that were under leases provided by the Council and third party owned sites where an independent business was actively trading. Thus, some sites affected by the CPO were excluded including those that were owned by institutional investors and where there was no current activity on site. This also applied to those that were adjacent to the site and where minimal impact would be caused, this included Tesco and IKEA to the north of the CPO boundary/ site.
- 11.3 In total there were 24 separate business entities in the scope of the survey and these businesses occupied 27 units. Through the course of the survey each business was contacted between 2-3 times to ensure as complete a sample as possible. In our initial proposal we identified the possibility of securing between 60%-70% of surveys from the units affected. However, following completion of the telephone interviews, and to allow time for analysis to be included in this EQIA 21 units were surveyed and this represented 18 businesses. Thus, in terms of the rate of return on the survey completed this represented 77.8% of the units on the site and 75.0% of the businesses trading on the site.
- 11.4 Achieving 75% of the businesses on the site affected by the CPO provides a reasonable level of statistical validity to these survey findings.
- 11.5 As with any EQIA based survey our preoccupation was to target those most likely to be affected by the regeneration scheme and to draw together data that identified their protected characteristics. To this end the survey focused on the staff working in each business and the ownership of those businesses. Business managers and or owners of the business provided responses over the phone to the questions raised in the survey, on average each survey took between 20-30minutes to complete.
- 11.6 In addition, the data set out below has been broken down by all businesses engaged in the survey and then subsequently broken down by those businesses that hold a lease from the council and those that are in third party ownership (freeholds). This section will start with the profile of staff within the site:

### Total staff numbers

- 11.7 Across the 18 businesses that responded to the survey (75.0% of all businesses) the survey showed that there were 218 people employed on site. Of these 188 are employed in units that are leased from LB Enfield and 30 are employed in businesses that are in units with a third party ownership.

### Gender of Staff

- 11.8 In response to questions 2, 3 and 4 the survey established that there are 155 men (71.1%) and 63 women (28.9%) working in the businesses that responded to the survey. The profile for those working in businesses with council leases was 80.3% male and 19.7% female and for those working in businesses in units under third party ownerships was 13.3% male and 86.7% female.
- 11.9 There were no staff in any businesses surveyed that were undergoing or who had undergone a transition.

Table 6: Gender profile of staff within responding businesses.

Q2, Q3 & Q4. How many women, men and trans people work in this business?	All Units		Council Leases		Third Party Owned	
	Count	%	Count	%	Count	%
Female	63	28.9%	37	19.7%	26	86.7%
Male	155	71.1%	151	80.3%	4	13.3%
Trans	0	0.0%	0	0.0%	0	0.0%
Total	218	100.0%	188	100%	30	100.0%

### Disability

- 11.10 In response to question 5 there were three members of staff working in the businesses that completed the survey that were classified as having a disability this represented 1.4% of all staff working within the site. All three disabled staff worked in units that were leased from the council representing 1.6% of the staff working in these units.

Table 7: Disability profile of staff on site

Q5 How Many disabled people work in this business?	All Units		Council Leases		Third Party Owned	
	Count	%	Count	%	Count	%
Disabled People	3	1.4%	3	1.6%	0	0.0%

## Age

- 11.11 The age profile of staff working for businesses engaged through this survey showed that 45% were aged between 22-34, the largest represented age groups, this was followed by 32% 35-44, 15% 45-54, 4% were aged 55-64, 2% were aged 17-21 and 1% were over 65. The full breakdown, including the age distribution of council leased businesses and units that were in third party ownerships, is set out in the table below.

Table 8: Age profile of staff within responding businesses.

Q6. What proportion of your workforce are in the following age groups?	All Units		Council Leases		Third Party Owned	
	Count	%	Count	%	Count	%
17-21	4.4	2.0%	4.4	2.3%	0	0.0%
22-34	98	45.0%	83	44.1%	15	50.0%
35-44	70.2	32.2%	58.2	31.0%	12	40.0%
45-54	32.7	15.0%	32.7	17.4%	0	0.0%
55-64	9.7	4.4%	9.7	5.2%	0	0.0%
65+	3	1.4%	0	0.0%	3	10.0%
Total	218	100%	188	100.0%	30	100.0%

## Ethnicity

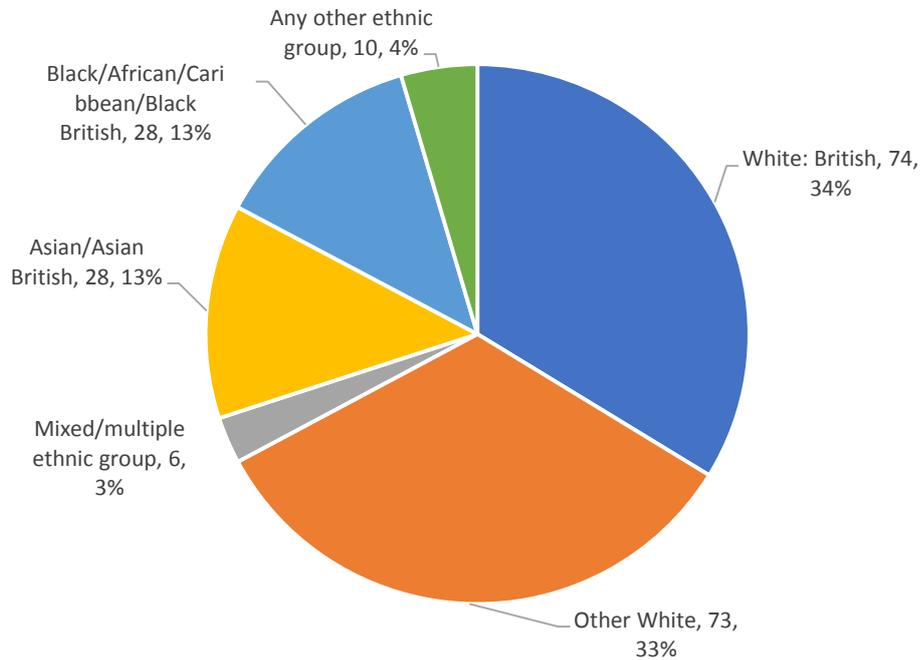
- 11.12 The ethnic profile was provided by business managers and owners. In designing the survey, it was agreed with Enfield that the survey would use broad ethnic categories of White British, White other, Asian/Asian British, Black/Black British, Mixed/multiple ethnic and other ethnic groups. This was so that business owners and managers responding to the survey were able to respond to the survey even if they did not have detailed racial profile of their staff. However due to the higher proportion of White other groups in the Borough, particularly the Greek and Turkish/Cypriot populations it was felt that a further examination of the White other population could be undertaken to better understand the workforce population as set against the Borough's population.
- 11.13 Respondents were asked to provide the different percentages of their staff that came from the main ethnic categories of White British, White Other, Mixed, Asian, Black and Any other ethnic group.
- 11.14 The profile of the staff within responding businesses shows that 34% of staff were White British and thus 66% were not. This demonstrates a strong level of racial diversity of those employed within the properties within the red line of the CPO. White other was 33% and this ethnic category is further broken down in Table 6 below. Black and Asian categories were 13% each and other ethnic groups came to 5%.
- 11.15 It is noted from the table below, that there is a level of comparison in the ethnic profile of staff within the red line and the borough. Indeed, the White British Population is below the boroughs' White British profile. The White Other and Asian profiles on the site are above these respective borough's profile. In contract the

Black profile on site is below the borough profile. In summary the ethnic minority profile of staff on the site is 66% compared to the Borough’s ethnic minority profile of 61.9%, showing that there is a higher proportion of staff that were not white British on the site.

Table 9: Ethnic profile of staff within responding businesses.

Q7. What % of your workforce come from the following ethnic groups?	All Units		Council Leases		Third Party Owned		Borough
	Count	%	Count	%	Count	%	%
White: British	74	33.8%	70.6	37.6%	3	10.0%	74
Other White	73	33.4%	48.8	26.0%	24	80.0%	73
Mixed/multiple ethnic group	6	2.8%	6.1	3.2%	0	0.0%	6
Asian/Asian British	28	12.8%	28	14.9%	0	0.0%	28
Black/African/Caribbean/Black Other/Black British	28	12.7%	24.6	13.1%	3	10.0%	28
Any other ethnic group	10	4.5%	9.9	5.3%	0	0.0%	10
Prefer not to say	0	0.0%	0	0.0%	0	0.0%	0
<b>Total</b>	<b>218</b>	<b>100%</b>	<b>188</b>	<b>100.0%</b>	<b>30</b>	<b>100.0%</b>	<b>218</b>

Chart 3: Ethnic Profile Business staff Feb 2020

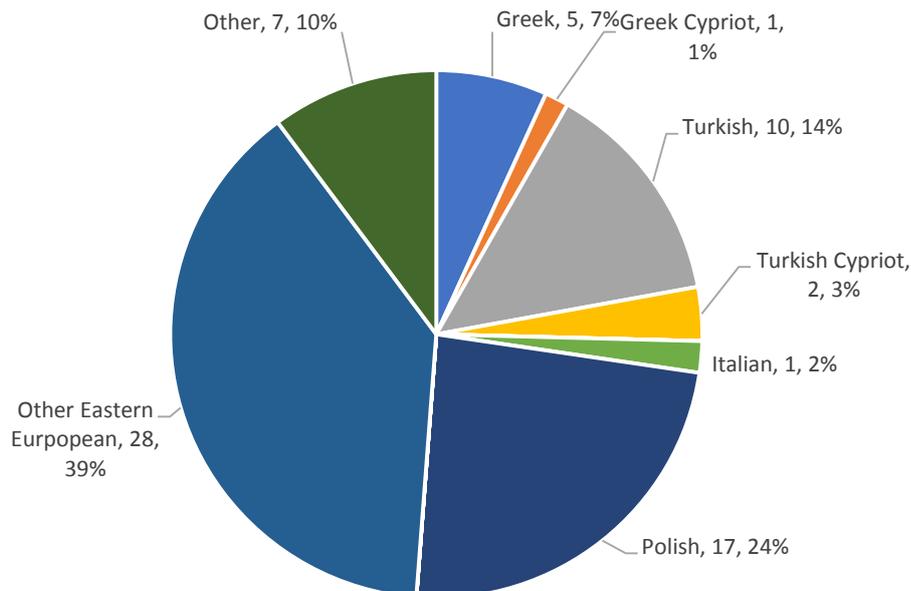


11.16 The table below sets out the White Other profile of staff in more detail. Enfield has a large white other population 25.1% based on 2019 data sets, however the white Other profile of staff was 33% which is significantly higher. The table below shows how this group of staff is made up. 39% of staff are of 'other' eastern European origin, 24% are polish, and 17% are either Turkish or Turkish Cypriot and 8% are either Greek or Greek Cypriot.

Table 10: White Other Sub-profile of staff within responding businesses.

Q8. If you answered Whiter Other, please can you judge the % of those that are white other by the following categories?	All Units			Council Leases		Third Party Owned	
	Count	% White Other	% all ethnicities	Count	%	Count	%
Greek	5	6.8%	2.3%	5	10.1%	0	0.0%
Greek Cypriot	1	1.4%	0.5%	1	2.2%	0	0.0%
Turkish	10	13.9%	4.6%	8	15.8%	2	10.0%
Turkish Cypriot	2	3.3%	1.1%	0	0.0%	2	10.0%
Irish	0	0.0%	0.0%	0	0.0%	0	0.0%
Italian	1	1.9%	0.6%	1	2.9%	0	0.0%
Polish	17	23.9%	8.0%	10	20.9%	7	30.0%
Russian	0	0.0%	0.0%	0	0.0%	0	0.0%
Kurdish	0	0.0%	0.0%	0	0.0%	0	0.0%
Gypsy Irish Traveller	0	0.0%	0.0%	0	0.0%	0	0.0%
Other Eastern European	28	38.6%	12.9%	16	33.0%	12	50.0%
Other	7	10.2%	3.4%	7	15.2%	0	0.0%
Total	73	100%	100.0%	49	100.0%	24	100.0%

Chart 4: White Other Business Staff Profile Feb 2020



### Sexual Orientation

11.17 The sexual orientation of staff within the site area is set out in the table below. It is clear that for a significant number of staff on the site respondents to the survey did not know the Sexual Orientation of their staff (28%). However, of those that did 68% were described as Heterosexual/Straight and 4% were described as LGBTQ.

Table 11: Sexual orientation profile of staff within responding businesses.

Q9. What proportion of your workforce is made up by the following sexual orientations?	All Units		Council Leases		Third Party Owned	
	Count	%	Count	%	Count	%
Heterosexual/Straight	148	67.9%	148	78.7%	0	0.0%
LGBTQ	8	3.7%	8	4.3%	0	0.0%
Don't Know	62	28.4%	32	17.0%	30	100.0%
Prefer not to say	0	0.0%	0	0.0%	0	0.0%
Total	218	100%	188	100.0%	30	100.0%

### Faith

11.18 The faith and religions of staff within the site area is set out in the table below. It is clear that for a majority of staff on the site respondents to the survey did not know the Faith of their staff (53%). However, of those that were known 22% are Christian, 7% are Muslim and 6% have no religion. What this suggests is that for business managers and owners the knowledge of their staff's faith was not seen as relevant to their employment or their needs whilst in employment.

Table 12: Faith profile of staff within responding businesses

Q10. What proportion of your workforce practice the following religions/faiths?	All Units		Council Leases		Third Party Owned	
	Count	%	Count	%	Count	%
Christian	47.4	21.7%	47.4	25.2%	0	0.0%
Buddhist	0	0.0%	0	0.0%	0	0.0%
Hindu	5.5	2.5%	5.5	2.9%	0	0.0%
Jewish	2	0.9%	2	1.1%	0	0.0%
Muslim	14.6	6.7%	14.6	7.8%	0	0.0%
Sikh	5.5	2.5%	5.5	2.9%	0	0.0%
Other	0	0.0%	0	0.0%	0	0.0%
No Religion	14	6.4%	14	7.4%	0	0.0%
Don't Know	115	52.8%	85	45.2%	30	100.0%
Prefer Not to Say	14	6.4%	14	7.4%	0	0.0%
Total	218	100.0%	188	100.0%	30	100.0%

### Maternity/Paternity

11.19 The maternity/paternity profile was based on those number of staff identified by business managers and owners as being on maternity or paternity leave. This is a proxy measurement of maternity and paternity however it was something that it

was felt would elicit an understanding of the proportions who are in this category. From the responses given 3 members of staff (1.4%) of the sample were described as being on maternity or paternity leave.

Table 13: Maternity/Paternity profile of staff within responding businesses

Q11. How many members of your workforce are on either maternity or paternity leave?	All Units		Council Leases		Third Party Owned	
	Count	%	Count	%	Count	%
Maternity/Paternity Leave	3	1.4%	1	6.7%	2	0.53%

### Marriage and Civil Partnership

- 11.20 If was felt that this protected characteristic was not relevant to this survey and hence this data was not gathered as part of this business survey. Equally for many of the businesses it was assumed that this information may not have been gathered and or known.

### Where staff live

- 11.21 Whilst not a protected characteristic it was felt that it would be helpful to understand where staff live in relationship to their place of work. Businesses were asked the proportion of their workforce that live in Enfield and or in adjacent boroughs. In response 45% of staff were recorded as living in Enfield, 10% in Haringey, 7% in Waltham Forest and 7% in Barnet with 28% living further afield. What this suggests is that just under 50% live locally, and 72% live locally and within the immediate neighbouring boroughs with 28% living further away. It is clear that the majority of staff are local to the site and hence moves from this locality will have an impact on their travel to work and indeed their capability of continuing in employment locally to themselves,

Table 14: Profile of where staff within responding businesses live

Q12. What proportion of your workforce live in Enfield, or in adjacent boroughs?	All Units		Council Leases		Third Party Owned	
	Count	%	Count	%	Count	%
Enfield	101	46.4%	101	53.8%	0	0.0%
Haringey	22	10.2%	22	11.9%	0	0.0%
Waltham Forest	16	7.5%	13	7.1%	3	10.0%
Barnet	16	7.5%	16	8.7%	0	0.0%
Other	62	28.4%	35	18.6%	27	90.0%
Total	218	100.0%	188	100.0%	30	100.0%

### Travel to work

- 11.22 Respondents were asked their awareness of the travel to work times for their workforce. This combined with the question above provides a strong indication of the local nature of many of the workforce's place of work. 99% of the workforce

had a 1 hour journey in order to travel to work. This suggests a relatively localised workforce. It is also a reflection of the logistical access the site as a one hour journey could encapsulate a journey of up to 40-50 miles or more. However, what this does suggest is that an hour is seen as acceptable for staff to get to work in a north London location which is relatively well service by public transport and road access.

Table 15: Profile of the time taken to get to work of staff within responding businesses

Q13. On average what proportion of your workforce take the following time to get to work?	All Units		Council Leases		Third Party Owned	
	Count	%	Count	%	Count	%
Less than 30 minutes	34	15.6%	34	18.1%	0	0.0%
30 minutes to 1 hour	180	82.5%	150	79.7%	30	100.0%
1 -2 hours	3	1.5%	3	1.7%	0	0.0%
More than 2 hours	1	0.5%	1	0.5%	0	0.0%
Total	218	100.0%	188	100.0%	30	100.0%

### Full time and Part time staff

11.23 Respondents were asked about whether their workforces were made up of full time or part time employees. Across the site 70% of staff are full time and 30% part time. This is slightly higher in those businesses with a council lease but the opposite was the case for those businesses that were third party owned where there was 70% that were part time and 30% full time.

Table 16: Profile of Full time and Part time workers within responding businesses

Q14. What proportion of your workforce are employed full time or part time?	All Units		Council Leases		Third Party Owned	
	Count	%	Count	%	Count	%
Full Time	152	69.8%	143	76.2%	9	30.0%
Part Time	66	30.2%	45	23.8%	21	70.0%
Total	218	100.0%	188	100.0%	30	100.0%

### Language

11.24 Business managers and owners were asked what the main language is that is spoken in their businesses and all stated that this was English. However, within this there were clearly other languages spoken and this included Polish, Italian, Turkish and Gujarati. It is clear from a business and operational sense that language is not a factor for the way these business function.

### Perceptions of how the development will impact on their business

- 11.25 Business managers and owners were asked 'overall how would the regeneration of Meridian Water (Stone Hill Business Park/Orbital Business Park) impact on their business. It was interesting to see these responses as 67% felt that their perceived impact would be mostly negative, 22% did not know and 11% felt that it was mostly positive. 100% of those that were in third party owned units, and hence subject to the CPO felt this development would have a mostly negative impact.

Table 17: Overall how would the regeneration of Meridian Water (Stone Hill Business Park/Orbital Business Park) impact on your business

Q17. Overall how would the regeneration of Meridian Water (Stonehill Business Park/Orbital Business Park) impact on your business?	All Units		Council Leases		Third Party Owned	
	Count	%	Count	%	Count	%
Mostly Positive	2	11.1%	2	11.8%		0.0%
Mostly Negative	12	66.7%	11	64.7%	1	100.0%
Not Known	4	22.2%	4	23.5%		0.0%
Total	18	100.0%	17	100.0%	1	100.0%

- 11.26 Respondents were given the opportunity to identify why they responded to this question in this way. What is clear is that the majority of those that felt the scheme has a mostly negative impact related to their requirement to leave the site through the termination of their lease and or the CPO. This is clearly a significant factor but some they needed support in trying to find alternative locations from which to do their business. Several indicate the potential loss of jobs for those working in their business in part because of the relocation impact to their current staff but also for some because they will have to close down. Issues of the loss of storage and the higher cost of new premises are also likely negative development consequences for these businesses. For those that said they 'did not know' cited the lack of awareness and clarity about the proposals. More detailed responses are set out below.

Table 18: Perception as to why respondents either felt the regeneration was mostly negative, Don't Know and mostly positive.

Mostly Negative	Don't Know	Mostly positive
We have to move after 16 years as our lease is up to 2022. We need another property for business. Require assistance from Enfield council. Concern about future rent doubling	We are hoping to relocate and would like to discuss this with Enfield council	We are a delivery partner with local authority and Mayors office: developing and investing in workspace in Meridian water and provide machinery 500 active members
Mostly negative impacts as we have to leave	Our business is not aware of regeneration proposals	
Losing storage space and the project's timescale is not clear	We rent this site so have to relocate	
We hope to incorporate a new venue with Enfield council	We are unclear about plans	

Mostly Negative	Don't Know	Mostly positive
Trying to move . Rent level increased 6-fold. Alternatively, it would cost £ 1.5 million to purchase a similar property		
We will be losing land and we need to move site. Going Lakeside or Chadwell Heath so people are likely to lose their jobs		
We see this a negative as we will have to relocate, and we are likely to lose some of our customers		
Its negative because we will have to close or move		
This could result in the loss of loss of 60 jobs, this will finish the business, we will have no access for deliveries. Require a more detailed discussion with council. Think there a lack of communication.		

### General Comments

- 11.27 A final mop up questions was asked whether respondents had any further comments to make. There was a mix of perceptions ranging from the view that their business will likely close down to concerns regarding job losses, redundancy and the cost of moving and the cost to their business. Several respondents understood the principles behind Meridian Water and the benefits that would be accrued for the locality and for people who need housing but there was an equal sense that their loss would be for this wider gain.

Table 19: Further comments about the regeneration proposals

Q18. As a local business in Meridian Water (Stonehill Business Park/Orbital Business Park) do you have any comments about the regeneration proposal?
More information is required
Business will not survive
Like to stay where we are
We can see overall benefit
Keen to know timeframe
I see benefits of regeneration as a local. We are trying to develop a new business with a showroom shop in the new development with yard elsewhere. Developers need to offer units to current occupiers. Takes a month to assemble our machinery and so moving will require good time planning.
We will have to relocate
Recognise need for housing. More support for industrial businesses but means more pollution by lorries as travel further, some of my staff may find it hard to get another job given their age and their skills levels
Need new location for business so massive impact, higher rent. Like having to start again after 7 years
Will close business if not relocated

**Q18. As a local business in Meridian Water (Stonehill Business Park/Orbital Business Park) do you have any comments about the regeneration proposal?**

Need update

All good if can stay here

The scheme is largely positive, but the development needs to be handled sensitively. We are prepared for change

Concerns re: Redundancy costs, negotiating costs and loss of business. £2 million of machinery garment processing logistics

### **Profile of business ownership by equality characteristics.**

11.28 Four additional questions were asked about the gender, disability, age and race of business owners. Of the 18 businesses included in this sample 17 were identified as having an owner and one business was owned by an institutional investor. In summary:

- 89% of business owners were male and 6% female and 6% institutionally owned
- No businesses were owned by a person with a disability
- 37% of businesses are owned by a person aged between 45-54, 17% are owned by people aged between 22-34, 35-44, 55-64 and 6% are owned by a person over 65.
- 44% of business are owned by a person who is white British, 33% by a person who is white other, 17% by a person who is Asian and the remainder 6% by an institutional investor.

Table 20: Gender profile of business owners

Gender profile of Business owners		
Male	16	88.9%
Female	1	5.6%
Institutionally Owned	1	5.6%
Total	18	100%

Table 21: Disability profile of business owners

Disability profile of business owners		
Yes		0.0%
No	17	94.4%
Institutionally Owned	1	5.6%
Total	18	100.0%

Table 22: Age profile of business owners

Age Profile of business owner		
17-21		0.0%
22-34	3	16.7%
35-44	3	16.7%
45-54	7	38.9%
55-64	3	16.7%
65+	1	5.6%
Not known/not applicable	1	5.6%
Total	18	100.0%

Table 23: Ethnic profile of business owner

Race of Business owners		
White British	8	44.4%
White Other	6	33.3%
Black African/Caribbean	0	0.0%
Asian	3	16.7%
Other	0	0.0%
Not known/ not applicable	1	5.6%
Total	18	100.0%

## 12 Appendix 5: Acknowledgements and thanks

Name	Organisation
Paul Gardener	Senior Regeneration Manager Meridian Water LB Enfield
Elizabeth Paraskeva	Principal Lawyer, Regeneration and Contracts Teams LB Enfield
Madi Mukhametaliyev	Principal Regeneration Officer, Meridian Water LB Enfield
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Ilhan Basharan	Equalities, LB Enfield
Sam Collyer	Glenny Asset and Property Management
Nick Finney	Arup
Mathew Bodley	Matthew Bodley Consulting
Melanie Dawson	Senior Regeneration Lawyer LB Enfield
Julie Thornton	Senior Planning Lawyer

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## **STATEMENT OF REASONS**

TOWN & COUNTRY PLANNING ACT 1990

LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS) ACT 1976

ACQUISITION OF LAND ACT 1981

**LONDON BOROUGH OF ENFIELD**

**(MERIDIAN WATER STRATEGIC INFRASTRUCTURE WORKS)**

**COMPULSORY PURCHASE ORDER 2020**

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## 1 Introduction

- 1.1 This document is the Statement of Reasons of the London Borough of Enfield (the **Council**) for making a compulsory purchase order (**CPO**) entitled the London Borough of Enfield (Meridian Water Strategic Infrastructure Works) Compulsory Purchase Order 2020 (the **Order**) which is to be submitted to the Secretary of State for Housing Communities and Local Government (the **Secretary of State**) for confirmation. The land included within the Order is referred to as the **Order Land** which is shown on the plan at Appendix 1 to this Statement (the **Order Map**).
- 1.2 The Council has made the Order pursuant to sections 226(1)(a) and 226 (3)(a) of the Town and Country Planning Act 1990 (the **1990 Act**) and section 13 of the Local Government (Miscellaneous Provisions) Act 1976 (the **1976 Act**). The Council is the local planning authority and local highway authority for the Order Land.
- 1.3 If confirmed by the Secretary of State, the Order will enable the Council to acquire the Order Land including certain rights over land compulsorily in order to undertake various strategic infrastructure works (**SIW**) described below in connection with the regeneration of the area known as **Meridian Water**. Meridian Water is also referred to in this Statement as the **Scheme**.
- 1.4 This Statement of Reasons has been prepared in compliance with the Ministry of Housing Communities and Local Government's (**MHCLG**) Guidance on Compulsory Purchase and the Crichel Down Rules (the **Guidance**). It explains why the CPO powers contained in the Order are necessary and why there is a compelling case in the public interest for making the Order, taking into account the Guidance. In addition the Council, in making this CPO, has considered the MHCLG Coronavirus (COVID-19): CPO guidance and is implementing additional measures accordingly.

## 2 Location and Description of the Order Land

- 2.1 The Order Land is located within the area known as Meridian Water, which is within the Council's ward of Upper Edmonton. Meridian Water comprises land situated on the west side of the West Anglia Mainline railway previously owned by National Grid and occupied by gas holders, now removed (Zone 1); land to the east of the West Anglia Mainline railway bounded by the North Circular to the north, Leaside Road in the south and the Lee Navigation to the East (which includes the IKEA store, the Tesco store, Orbital Business Park) (Zones 2 (part), 4 and 5). It also includes the existing Strategic Industrial Land (**SIL**) to the east of the Lee Navigation (Zones 6 and 7) as well as green belt land between Harbet Road and the River Lee (Zone LV1). Approximately 74% of the developable land within Meridian Water is already owned by the Council including Zone 1, Zone 2 (part), Zone 4, Zone 5, and large parts of Zones 6 and 7 to the east of the Lee Navigation. The different Zones are identified in the plan at Appendix 3.
- 2.2 Meridian Water is traversed by three waterways, Pymmes Brook, Salmons Brooks and the River Lee Navigation, and is bordered to the east by the River Lee and adjoins the Lee Valley Regional Park (**LVRP**).
- 2.3 The southern boundary of Meridian Water is also the boundary between the Council's administrative area and the administrative area of the London Borough of Haringey (**LBH**). To the south of Meridian Water is Leaside Road which is a highway maintainable at public

expense within LBH. The SIW require works to be carried out on highways within LBH but this work does not form part of the Order.

2.4 The Order Land comprises a total of 124 plots on which the Council is seeking powers of compulsory acquisition and the compulsory creation of new rights in land.

2.5 Those plots are coloured pink on the Order Map will be acquired. A description of each plot is set out in the Order Schedule and is more generally described as follows:

2.5.1 Angel Edmonton Road / Leaside Road, public highway and adjoining verge (plots 98 - 99);

2.5.2 Glover Drive, public highway and adjoining verge (plots 1 - 10);

2.5.3 part of IKEA car park (plots 9, 11, 17 and 18);

2.5.4 part of land comprising car park and internal roads owned by Tesco and British Steel Pension Fund Trustees (plots 6, 7, 12 and 13);

2.5.5 verge and land adjoining Argon Road (plots 22 and 26 – 29);

2.5.6 part of Pymmes Brook and adjoining verge (plots 24, 36, 75, 85, 89 and 91);

2.5.7 former National Grid gasholder site (plots 90 and 92 - 94);

2.5.8 former Orbital Business Park (plots 31, 39, 42, 72 and 78);

2.5.9 part of River Lee Navigation Towpath, Towpath Road, public highway and adjoining verge (plots 106, 107, 109, 112, 113 and 114);

2.5.10 Anthony Way and Rivermead Road private road (plots 115 and 123);

2.5.11 cleared industrial site on site of part of former Stonehill Business Park (plot 116);

2.5.12 part of Harbet Road, public highway and adjoining verge (plots 125 and 126);

2.5.13 vehicle parking and waste transfer site east of Harbet Road (plots 136 and 137); and

2.5.14 Green Belt land east of Harbet Road (plots 127 - 135).

## 2.6 **New Rights**

2.7 In addition to the acquisition of land included in the Order new rights are required over other land to undertake the works and allow for future maintenance. The land over which new rights are sought is shown coloured blue on the Order Map.

2.8 A summary of the rights required and why they are needed is set out below:

2.8.1 access needed in order to construct the SIW;

2.8.2 temporary construction roads;

- 2.8.3 construction compounds;
- 2.8.4 crane oversailing;
- 2.8.5 rights to improve, re-grade, resurface and landscape land;
- 2.8.6 rights to alter the route of existing pedestrian and vehicular access ways;
- 2.8.7 rights to construct/improve/maintain parts of rivers and canals;
- 2.8.8 rights to construct bridges to accommodate carriageways built to adoptable standards and to use and maintain bridges for the purposes of pedestrian and vehicular traffic; and
- 2.8.9 rights to discharge into watercourses.

2.9 The rights listed above at paragraphs 2.8.1 to 2.8.4 (inclusive) are required only during the construction of the SIW. At this time the Council does not have legal powers to seek temporary possession of land (until the provisions of the Neighbourhood Planning Act 2017, Part 1 Chapter 2 are brought into force), and as such must acquire these rights permanently through the Order. However the Council is content, on completion of construction of the SIW, to enter into the necessary agreements with the relevant landowners to relinquish those rights.

### 3 **The Purpose for Which the Land is to be Acquired**

3.1 The Order Land is required for the construction of the SIW, which are described below. The SIW are necessary to allow for further development at Meridian Water. The Order is needed to secure the necessary land assembly, within a reasonable timescale.

3.2 A significant part of the Order Land (72%) is already in the ownership of the Council, having been acquired via voluntary negotiations. Negotiations with remaining landowners are continuing. The Council has reached voluntary agreement with other parties and is continuing in its attempts to acquire the remaining interests by agreement (explained in section 7). In order to deliver the SIW, it is essential that all of the remaining third party land interests, including any unknown interests, are brought into single ownership and all necessary rights are secured.

3.3 The Council has given careful consideration to the need for the land and rights within the Order Land and is satisfied that all of the land and rights included within the Order are necessary and justifiable, as detailed below.

#### 3.4 **Meridian Water**

3.5 Meridian Water is one of London's most significant regeneration opportunity areas and offers an important opportunity to deliver a new urban neighbourhood in north-east London. The delivery of Meridian Water is a critical component of the long-term growth ambitions for Enfield and the draft London Plan identifies Meridian Water as a strategic opportunity as part of the Mayor's ambitions for significant growth in the Lee Valley. It comprises approximately 85 hectares and is one of the largest areas of underused and brownfield regeneration land in London, with large areas of derelict land alongside

industrial accommodation of varying age and quality. The full extent of the Meridian Water regeneration area is identified on the plan at Appendix 2.

- 3.6 The Council aims to regenerate Meridian Water comprehensively over a period of approximately 20-30 years. The Council's adopted planning policy supports the delivery of approximately 5,000 new homes, 1,500 new full time jobs, schools, community facilities, health services and open spaces, within a new character area. Over the lifetime of the development there is an aspiration to deliver up to approximately 10,000 new homes including thousands of affordable homes together with associated development which would be supported through future planning policy. However, the justification for the Order is based on the 5,000 new homes which are supported by existing planning policy (see section 4 below).
- 3.7 The ambition for Meridian Water is to reshape an area that is currently an under-utilised industrial and retail site, to provide new homes for local people and to grow and diversify the local economy, creating job opportunities across the salary spectrum. The further development of new and existing economic sectors can unlock economic growth and create thousands of new jobs. It will represent a step-change away from industrial warehousing and logistics type uses, offering higher skilled and higher paid employment opportunities for local people. Meridian Water will be a model for sustainable place making, optimising the opportunities offered by a new Meridian Water railway station (the **Meridian Water Station**) (potentially incorporating Crossrail 2), as well as its location in the Upper Lee Valley and Lee Valley Regional Park. It is envisaged that the regeneration will come forward in phases over a 20-30 year period.
- 3.8 Meridian Water has been designated as a housing zone by the Mayor of London and is one of the Mayor's regeneration priorities. Its regeneration has been a longstanding objective of the Council and it is the largest priority area for residential-led mixed-use development in the Council's Core Strategy (November 2010). The Council's draft Local Plan 2036 (Issues and Options) published 2018 for Regulation 18 public consultation reaffirms the objective to deliver the Meridian Water project as one of its key regeneration schemes, whilst Meridian Water is included within the Council's Edmonton Leaside Area Action Plan (**ELAAP**) adopted in 2020. The regeneration supports the ambitious aims of the Mayor of London's Upper Lee Valley Opportunity Area (the largest opportunity area in London), the Mayor of London's Crossrail 2 Growth Commission report in promoting the route via the Lee Valley as a growth corridor and forms part of a successful bid for Housing Infrastructure Fund (**HIF**) grant funding from Homes England.
- 3.9 Due to the scale of the Meridian Water proposals, the area has been divided into eight development zones which will come forward in phases (which may comprise one or more development zones). The eight development zones (**Zones**) are identified on the plan at Appendix 3.
- 3.10 Phase 1 (part of Zone 1) will initially provide up to 725 new homes, retail, leisure and community uses, transport and infrastructure improvements, public open space and recreational facilities. The location of Zone 1 is shown on the plan at Appendix 3. The Council granted outline planning permission for the development of Phase 1 on 10 July 2017. Phase 1 included a new Meridian Water Station which has been constructed. Other development is expected to begin in 2021. Zone 1 also has capacity for further development.

- 3.11 An outline planning application (Ref: 19/02718/RE3) for Phase 2 received a resolution to grant planning consent (subject to referral to the Greater London Authority, completion of the S106 Agreement and conditions) in March 2020 for development of Zones 2 (part), 4 and 5 comprising up to 2,300 residential units (Class C3), Purpose Built Student Accommodation and/or Large- Scale Purpose-Built Shared Living (Sui Generis); a hotel (Class C1), commercial development (Class B1a,b,c); retail (Class A1 and/or A2 and/or A3 and/or A4), social infrastructure (Class D1 and/or D2), a primary school for up to three forms of entry, hard and soft landscaping, new public open spaces including equipped areas for play, sustainable drainage systems, car parking provision, and formation of new pedestrian and vehicular access (all matters reserved) (**Phase 2**). Zones 2 (part), 4 and 5 are shown on the plan at Appendix 3 and the Phase 2 masterplan is shown at Appendix 5.
- 3.12 The residential element of Phase 2 will provide much needed affordable housing in an accessible location whilst avoiding unnecessary development on greenfield sites. The development will include significant employment generating capacity, with large areas of commercial and retail floorspace as well as the option to provide large-scale purpose built shared living and a hotel. The proposed development also makes provision for community uses to serve the needs of existing residents and new resident and business communities. A new three-form entry primary school, up to 5,500 sq m of social infrastructure and new open spaces will provide some of the social infrastructure needed to begin creating a new community and character area at Meridian Water.
- 3.13 The development of Meridian Water will be implemented in phases. In relation to Phase 1 the Council selected Vistry Partnerships (formerly Galliford Try Partnerships prior to its merger with Bovis Homes) as its development partner in June 2019. In March 2020 Vistry Partnerships were also selected to deliver the part of Phase 2 comprising Zone 2 (part) (the gasholder site comprising approximately 250 units). The Council is currently considering delivery options for the remainder of Phase 2 and future phases, which are discussed further below.
- 3.14 On 6 September 2016, the Council's Cabinet resolved that it was willing in-principle to use compulsory purchase powers, if necessary, across the entire Meridian Water area to bring forward the regeneration. At the time of the in-principle resolution in September 2016, the Council intended to proceed with a single master developer for the whole of Meridian Water and a consortium between Barratt Homes and Segro had been selected as the master developer. In October 2017 the relationship with Barratt/Segro was terminated and other delivery options were considered. Subsequently the Council decided to pursue a different approach and on 25 July 2018 the Council's Cabinet decided for Phases 1 and Zone 2 (part) to work with selected development partners. The approach to future phases is subject to further analysis. Under the new approach, the Council will lead on working up the masterplan and deciding on the optimal phasing of delivery. Despite this change of approach to delivery of Meridian Water, there is no change in the approach to land assembly which will still require the use of CPO powers where land cannot be assembled by agreement.
- 3.15 This is the second CPO made by the Council in connection with the delivery of Meridian Water. On 4 July 2017 the Council made the London Borough of Enfield (Leeside Road and Willoughby Lane) Compulsory Purchase Order 2017, following a resolution by the Council's Cabinet to make the CPO on 26 April 2017. That CPO was confirmed by the Council on 12 September 2017 in accordance with section 14A of the Acquisition of Land Act 1981 and a general vesting declaration made on 11 September 2019. This order

related to land required to facilitate the development of Zone 1. It may be necessary for the Council to make further CPOs to facilitate later phases of Meridian Water if all the land required for those phases cannot be acquired by private treaty negotiations.

3.16 The SIW are required to enable the implementation of Phase 2 and all subsequent phases of Meridian Water.

3.17 On 22 January 2020 the Cabinet resolved to use compulsory purchase powers to acquire the Order Land and:

3.17.1 delegate authority to the Programme Director of Meridian Water in consultation with the Acting Executive Director of Resources and Director of Law and Governance to make the Order; and

3.17.2 delegate authority to the Executive Director of Place in consultation with the Director of Law and Governance and the power to effect all subsequent activities for the Order.

3.18 Although the Order, if confirmed, will authorise the acquisition of land and rights for the SIW only, for the purposes of the Land Compensation Act 1961, section 6D (as inserted by the Neighbourhood Planning Act 2017, s.32), the **Scheme** is Meridian Water as a whole.

### 3.19 **The Strategic Infrastructure Works (SIW)**

3.20 The SIW are an essential element of the Scheme. They are required to enable the delivery of Phase 2 and the subsequent phases of development at Meridian Water. In summary, they comprise the construction of new roads, footpaths, cycleways and bridges, rail improvements, land remediation, new utilities and the diversion of existing utilities and flood alleviation works. The SIW are shown diagrammatically and illustratively on the drawings at Appendix 4.

3.21 A 'full' planning application (ref: 19/02717/RE3) for the SIW was granted on 22 July 2020. A separate linked planning application for a low level flood restraint barrier adjacent to the canal towpath is pending determination (Ref: 20/00112/RE4).

3.22 The SIW are described below (references in brackets refer to the labelling on the drawing at Appendix 4):

3.22.1 **The Central Spine Road** (R2, R3 and R6) - a new tree-lined east-west boulevard connecting to Glover Drive and new Meridian Water Station in the west, crossing the Pymmes Brook and Salmons Brook and River Lee Navigation to Harbet Road in the east that sits within the Central Spine Corridor that is identified in the adopted ELAAP. The erection of bridges and associated works are required to enable the Central Spine Road, comprising the Lee Navigation Bridge, the Pymmes Brook North Bridge and the Salmon's Brook Bridge (shown as B1, B2, and B4 respectively). The Central Spine Road is required in the proposed form and location for the following reasons and will deliver significant improvements to east-west connectivity across the site for buses, pedestrians and cyclists. Further details are provided in the Transport Assessment accompanying the SIW planning application and Phase 2 planning application:

- (a) The principle of the proposed Central Spine Road is well established in the Council's adopted planning policy (see section 4 below), which specifically identifies the need to provide a new spine running through Meridian Water, linking new and existing communities to employment and social infrastructure, the Meridian Water Station and the LVRP. By connecting this new rail station to other parts of Meridian Water, public transport accessibility throughout the Meridian Water will be improved.
- (b) The alignment of the Central Spine Road has been designed to maximise the accessibility of Phase 2 and future development to Meridian Water Station (by minimising walking distances) and to create efficient plots to maximise the delivery of homes. The Central Spine Road will provide direct and visual connection to Meridian Water Station and also through the centre of the site to the new Edmonton Marshes park. Bridges B2 and B4 will span the brooks and provide an east-west connection whilst retaining the industrial heritages of the confluence point of the brooks where a viewing point will be provided as part of Phase 2. The River Lee Navigation Bridge (B1) will extend this connection further to the east, providing resilience of access for emergency vehicles and buses and will connect Phase 2 with the SIL, the green space to the east and the wider LVRP. The width of the Central Spine Road has been designed to accommodate buses, pedestrians, cycle facilities and landscaping appropriate on the scale proposed by the Scheme and to encourage use of sustainable modes of transport.
- (c) Meridian Water currently has poor permeability for vehicles, pedestrians and cyclists due to severance caused by existing water courses and high proportion of goods vehicles on local industrial estate roads and heavy traffic flows on the North Circular (A406) to the north of the site. The Central Spine Road is intended to address this.
- (d) Dedicated, segregated two-way cycle tracks will be provided along the Central Spine Road to form direct routes across the Meridian Water area, linking the proposed development with public transport nodes as well as existing strategic cycle routes to the east to overcome the current lack of permeability for active modes.
- (e) In addition, the SIW will enable a comprehensive package of sustainable transport benefits for new residents to be delivered. This will include travel plans and pedestrian environment enhancements to improve accessibility in and around Meridian Water and the wider Upper Edmonton area, better connecting Edmonton Leaside to the rest of the borough.
- (f) The Central Spine Road will connect with north-south pedestrian and cycle links through Phase 2 in order to increase permeability by walking and cycling and to meet the Council and Transport for London's (TfL) Healthy Streets' objectives.

- (g) The proposed alignment of the Central Spine Road will enable efficient bus routing through the Meridian Water area and bus-rail interchange at Meridian Water Station. It will also be able to accommodate further enhancements to the bus network to serve Phase 2 and future phases of development as envisaged within the Bus Strategy appended to the Phase 2 and SIW Transport Assessment.
- (h) The Central Spine Road will minimise walking distances to bus stops, allow for the efficient siting of bus stops and maximise bus stop catchments within Meridian Water. Comfortable walking distances and proposed high quality pedestrian environments will help to make bus use more attractive and help support the Council's proposed lower car parking standards across Phase 2 and the wider Scheme.
- (i) The alignment of the Central Spine Road will improve public transport accessibility which will facilitate higher density development in Phase 2 than would otherwise have been appropriate.
- (j) The Central Spine Road will provide an additional point of access into Phase 2 and the wider Scheme. This will provide greater resilience of access for emergency vehicles and buses. It will also balance access for private vehicles to facilitate route choice, thereby increasing the performance resilience of access junctions onto Meridian Way.
- (k) The Central Spine Road will connect the new residential development to employment uses including the SIL, Harbet Road Business Parks and meanwhile uses in accordance with the Mayor's Transport Strategy (2018) Proposal 91 which states that *"The Mayor, through TfL and the boroughs, will explore the role for demand responsive bus services to enable Good Growth, particularly in otherwise difficult-to-serve areas of outer London"*.
- (l) Due to the phasing of the Scheme, the Central Spine Road has been designed to maintain access to existing occupiers. This will involve new access arrangements for IKEA, Tesco, the Arriva bus depot and for other industrial uses between Harbet Road and the River Lee Navigation.
- (m) The Tesco Extra and IKEA sites currently form a barrier to movement between Glover Drive and Phase 2 (and potential development in future phases), which would be addressed by the Central Spine Road.

3.22.2 **Leeside Link Road (R4).** This link will include the erection of a new bridge (to be known as the Pymmes Brook South Bridge (B5)) and associated works to span Pymmes Brook and will provide improved north-south connectivity for vehicles, pedestrians and cyclists, accommodating facilities for buses to enter/exit the site using Leeside Road. It is important to understand the purpose and orientation of the Leeside Link Road to provide context for the need for the Central Spine Road. Further information is provided in the Transport Assessment accompanying the SIW planning application and Phase 2 planning application. The need for the Leeside Link Road is summarised as follows:

- (a) The Leaside Link Road will connect with the Central Spine Road to provide an attractive walking and cycling route to the Meridian Water Station for the plots of land in the southern part of Phase 2. A new bridge (B5) will provide connectivity from Leaside Road into the centre of Meridian Water. This is a natural extension of the existing road network and will turn Leaside Road from an industrial dead-end road into an urban, street suitable for all modes of transport and thereby increase permeability of Meridian Water to the south and west.
- (b) There is an existing bridge in the location of the proposed crossing of the Pymmes Brook South Bridge (B5) but it is not a highway bridge, so having regard to its age and condition, it is not suitable for use as part of the Leaside Link Road.
- (c) The proposed width of the Leaside Link Road will be sufficient to accommodate walking and cycling facilities, infrastructure for buses and private vehicles and landscaping appropriate for a development of the scale proposed in Phase 2.
- (d) The proposed alignment of the Leaside Link Road will provide direct access to Leaside Road from Phase 2 and forms an appropriate bridge crossing of Pymmes Brook to connect with Leaside Road. The proposed alignment also maintains sufficient land within the gasholder site (part of Zone 2) to deliver viable new housing. The bridge will be on Council owned land and will not affect Tottenham Marshes which is an important public open space owned by the Lee Valley Regional Park Authority.
- (e) The Leaside Link Road will connect with the shared pedestrian and cycle route along the north side of Leaside Road which provides access to developments south of Leaside Road and west of Meridian Way. Without this link pedestrians and cyclists would need to use Glover Drive and the route along Meridian Way which is a busy road (c. 3500veh/hr two-way in peak periods) and a less suitable cycling and walking environment.
- (f) The Leaside Link Road increases the permeability of Phase 2 and wider Meridian Water for pedestrians and cyclists.
- (g) The Leaside Link Road provides for efficient bus routing through Phase 2 and Meridian Water and allows for greater flexibility for route options. It would also allow additional bus services to be diverted in the future as envisaged within the Bus Strategy appended to the Phase 2 and SIW Transport Assessment.
- (h) The Leaside Link Road allows for the efficient siting of bus stops, maximising bus stop catchments within Phase 2 and thereby minimising walking distances to bus stops. Comfortable walking distances and proposed high quality pedestrian environments will help to make bus use more attractive and help support lower car parking levels across Phase 2 and the wider Scheme.

- (i) The Leaside Link Road is important for improving the public transport accessibility of the southern part of Phase 2 and ensuring that non-car modes of travel are attractive throughout Meridian Water. Without the Leaside Link Road there is a risk that the diversion of bus services along the Central Spine Road would not be possible. If this were the case then the southern part of Meridian Water would need to be served by the existing northern access, or by new links delivered by the SIW. This would result in a greater travel distance to the Meridian Water Station from the southern part of the site with an associated reduction in public transport accessibility, and less efficient routing options for buses.
- (j) Allowing for vehicular movements along the Leaside Link Road into Phase 2 and the wider Scheme will provide an additional point of access. This will provide greater resilience of access for emergency vehicles and buses. It will also balance access for private vehicles to facilitate route choice, thereby increasing the performance resilience of junctions with Meridian Way. The existing Meridian Way junction at Glover Drive currently operates at or close to capacity and the additional vehicular access at the Leaside Link Road will help to balance traffic flows between the access junctions utilising what capacity is available for the future.
- (k) The Leaside Link Road will provide direct access to some retail and residential cores along its length and for buildings fronting the Central Spine Road.

3.22.3 **Brooks Park and River 'Naturalisation'** – naturalising Pymmes Brook to introduce an ecological river landscape, as well as providing riverside parkland (shown as F2).

- (a) Pymmes Brook is currently a concrete channel. The proposed works will involve naturalisation (works to river structures to improve the natural habitat) and storm water reduction capacity (S2). These works are essential as the Environmental Agency (**EA**) has identified the need for naturalisation of the Pymmes Brook as part of the Water Flood Directive objectives. Consultation has been held with the EA to discuss various options for naturalisation and identify the preferred solution, which is explained in more detail the Flood Risk Assessment submitted as part of the Phase 2 planning application.
- (b) The park is approximately 2ha in extent and would sit at the heart of the Phase 2 development. The park will contribute to the flood alleviation strategy and the naturalisation of this channel would deliver significant ecological benefits
- (c) With regard to the northern branch of the Pymmes Brook, it is proposed to undertake flood alleviation works to the wall to allow passage of flood water from within Zone 5 (F1).
- (d) Flood water that emanates from the Pymmes Brook will be stored within the naturalisation area along the western bank of the Pymmes Brook.

3.22.4 **Edmonton Marshes and Flood Alleviation Works** – re-levelling and remediation of land to the east of Harbet Road, providing comprehensive flood alleviation works and a new high quality public open space within the LVRP (shown as E1, ER1, and F5). The creation of a new park – known as Edmonton Marshes – is approximately 6.4ha in extent following the re-levelling and remediation to form part of the strategic flood alleviation strategy. The land on which this park would be accommodated is designated as Green Belt. Further explanation is included in the Flood Risk Assessment submitted as part of the Phase 2 planning application. In summary:

- (a) Two principal sources of flood risk must be managed to facilitate the development of Meridian Water: (i) fluvial flooding from the Pymmes Brook, Salmons Brook, Lee Navigation Canal and Lee Flood Relief Channel; and (ii) surface water flooding from on-site rainfall.
- (b) The EA require that for all vulnerable developments (which includes the majority of the buildings at Meridian Water) the ground floor levels must be raised. It is necessary to provide compensatory flood storage to offset the volume that is lost within the building plots.
- (c) The LVRP area is the most suitable area for providing the required compensatory storage. The proximity of this area to the development Zones from which the flood water will be displaced will ensure the technical feasibility of the proposed solution. The existing uses of the land required will not be affected. The use of the land for flood alleviation will not detrimentally impact the proposed development of a new country park on this land.
- (d) The proposed works comprise the excavation to provide the necessary flood compensation and also to generate material for reuse for infilling during construction elsewhere within Meridian Water. The excavated formation level has been determined on the assumption that it will be necessary to have sufficient topsoil to accommodate a layer of planting. The earthworks proposed to be undertaken in LVRP involve the lowering of ground levels to create the compensatory flood storage required to allow development in Phase 2, as well as future development in Zones 6 and 7. The management, storage and treatment of excavated material from ER1 will occur throughout the period of earthworks.

3.22.5 **Access Works** – works to provide new and altered accesses to the IKEA store (TPA2), a new north-south link between Argon Road and Glover Drive (J5), the creation of a link between the Central Spine Road and Anthony Way (TPA1) and other improvements to maintain access, along with other ancillary highway works to Glover Drive, Leaside Road and Meridian Way. Information on these works is set out in the Transport Assessment accompanying the SIW planning application and Phase 2 planning application. The case for the Access Works is summarised as follows:

- (a) The Central Spine Road has been designed to accommodate the needs of IKEA and Tesco. The access designs have been developed to

maintain access, retain store visibility and quality of the customer journey, and the continuation of servicing and delivery arrangements for adjacent occupiers.

- (b) The existing IKEA and Tesco stores and the Tesco petrol filling station are accessed from Argon Road, Glover Drive and a network of private internal roads. To the east of the Lee Navigation, there are industrial uses, including the Arriva Bus Depot, which are accessed from private roads off Harbet Road.
- (c) The proposed Central Spine Road will provide a connection between Glover Drive and Harbet Road. The connection at Glover Drive will affect access to the existing IKEA store and its northern surface level car park and internal access road. There will be minimal impact on Tesco's access routes as a result of the Central Spine Road.
- (d) The Central Spine Road will provide alternative access points into the IKEA store at Leaside Road, Meridian Water and Glover Drive. This will minimise the IKEA customer and servicing circulation route (and the subsequent diversion route as the result of the Central Spine Road) from the local highway network into the store. This provides IKEA with the opportunity to create a new car park south of the Central Spine Road. An application (ref: 20/00111/RE4) for the engineering works necessary to deliver the new car park on land to the west and south of the existing IKEA store received a resolution to grant planning permission (subject to the finalisation of conditions) on 21 April 2020. It will also help to reduce traffic within the vicinity of the Central Spine Road, in keeping with the aspiration to deliver Healthy Streets.
- (e) A new north-south link road will be provided incorporating part of the existing Tesco southbound exit carriageway and part of IKEA's northern car park. This new two-way road will serve a dual purpose of retaining southbound access from Argon Road to Glover Drive but also providing exiting IKEA vehicular traffic a route to the north. As a result of the introduction of this route, a number of changes are required to the existing arrangements along the new route as described in the Transport Assessment.
- (f) Where the Central Spine Road will cross the Lee Navigation, the closure of Towpath Road to vehicular traffic permanently will be necessary due to bridge landing requirements.
- (g) Most of the existing industrial uses in the SIL can be accessed directly from Harbet Road using private roads. However, access to the Arriva Bus Depot and to some other occupiers may be affected during construction. To maintain bus operations and ensure business access is not affected, the SIW include new access arrangements to the Arriva Bus Depot. A swept path analysis has been undertaken to ensure that these are suitable for goods vehicles, buses and buses being towed by a recovery vehicle. The layouts have been issued to Arriva and

discussed in meetings and comments have been incorporated into the design.

- (h) Since Anthony Way will be the new route for buses, a number of improvements to this road are proposed. These will include the re-provision of formal parking spaces, widening of the road to allow two-way bus movements and the introduction of a new pedestrian footway on one side of the road where space allows. This will provide an improved pedestrian and vehicular access route to existing industrial occupiers along Anthony Way and an alternative access to the Arriva Bus Depot.

3.22.6 **Earthworks, Remediation, Utilities and other ancillary works** – earthworks, retaining structures and remediation within Phase 2, installation of main utility network and ancillary works including the demolition of existing buildings and structures (shown as E5, E6, ER5 and ER6).

- (a) Earthworks and Remediation north and south of Central Spine Road are proposed to raise development levels, ready for plot developers to implement the development proposed within the Phase 2 application, above the flood levels in Phase 2. Excavation will occur primarily in three areas of the site, within Brooks Park for naturalisation, within Edmonton Marshes for flood alleviation and shallow excavations within Stonehill Business Park for the flood relief channel. The earthworks are essential to allow ground levels to be raised to provide mitigation against flood risk and enable development (see above). These earthworks also aid the surface water drainage.
- (b) The land north and south of Central Spine Road is existing/former industrial land with significant ground contamination risk. This land requires wholesale remediation in order for it to be suitable for residential development.
- (c) These works will be carried out principally within land owned by the Council, although they will require relocation of a gas governor and substation.

3.22.7 **Rail enhancement works.** Improvements are proposed to serve the Meridian Water Station to provide a more frequent service. Although this is part of the SIW, it is not necessary to acquire land for this purpose.

#### 4 **Planning Policy Relevant to the Scheme**

4.1 The Council's adopted and emerging planning policy is supportive of both the SIW and the wider Scheme, which is also consistent with regional and national policies.

#### 4.2 **The Enfield Plan: Core Strategy 2010-20 (the Core Strategy)**

4.3 The Core Strategy was adopted by the Council on 10 November 2010 and is part of the Council's development plan. It sets out the spatial planning framework for the long term development of the borough for the next 15-20 years. Core policy 2 states that the Council will plan to meet the housing growth targets as set out in the London Plan for the fifteen

year period from 2010/11 to 2024/25 and will plan for the provision of approximately 11,000 new homes.

- 4.4 The Meridian Water area corresponds with the Place Shaping Priority Area Meridian Water as designated in The Core Strategy. Core policies 37 and 38 deal specifically with Meridian Water. Policy 37 states:

*"At Meridian Water... ...the potential of a new sustainable urban mixed use community has been identified to play an important role in the delivery of planning and regeneration objectives, bringing forward in the region of 5,000 new homes and 1,500 new jobs."*

- 4.5 Policy 38 states:

*"Based on the evidence of initial growth scenarios in the Meridian Water Place Shaping Priority Area, the objectives of new development will be to create a new community by 2026 with up to 5,000 new homes, 1,500 new jobs and all the necessary infrastructure to support the community and attract families and new employers to the area."*

- 4.6 Core policy 38 also supports infrastructure improvements at Meridian Water including specific mention of the Central Spine Road stating the following aims:

*"A new spine running through the area, connecting all parts of Meridian Water, linking new and existing communities, the station and the Lee Valley Regional Park;*

*Improved connectivity, both north-south and east-west;"*

- 4.7 There are justifications and explanations of these policies in paragraphs 9.9 to 9.15 of the Core Strategy.

- 4.8 The Core Strategy also supports the Council acquiring land to control new development and use of CPO powers in appropriate circumstances:

*"Where opportunities arise, the Council will consider the acquisition of new sites in order to secure community benefit or control new development, which in some cases may provide an opportunity to generate revenue from its landholdings, which it can reinvest into the community." (paragraph 10.18)*

*"Where the Council does not own the land and it appears that development identified in the Core Strategy is not coming forward in a timely manner, the Council will use its compulsory purchase powers to allow development to progress." (paragraph 10.19)*

- 4.9 Although this is currently the Council's only adopted statutory development plan policy that specifies housing and development targets at Meridian Water, planning policy and framework agreements produced since 2010 (which do not yet form part of the Development Plan) take account of the growth in population in the borough as well as pressure on housing demand generally in London, and therefore have considerably higher targets than the Development Plan for housing units and job creation at Meridian Water.

4.10 The Council is preparing a new Local Plan which will incorporate updates to the Meridian Water proposals. A draft of the Local Plan has been consulted on, with the proposed submission stage expected in late-2020. The Core Strategy will remain in force as the Local Plan is prepared, although the Local Plan will assume greater weight in decision making as it progresses, and on its adoption will supersede the Core Strategy.

4.11 **Area Planning Policy – Edmonton Leaside Area Action Plan**

4.12 The ELAAP was first produced in November 2013 and revised to its submission version in January 2017. It was adopted in January 2020. The primary purpose of the ELAAP is to articulate in greater detail how the Core Strategy and relevant Development Management Document policies will be implemented, and to provide a more detailed policy framework to guide new development in the area.

4.13 The ELAAP provides a policy basis supported by evidence modelling, to achieve the Core Strategy aim of approximately 5,000 homes and 1,500 net full-time jobs at Meridian Water. Chapter 5 of the ELAAP deals specifically with Meridian Water. The Scheme is consistent with the principal aim of Chapter 5 of the ELAAP in bringing forward the regeneration of Meridian Water but the SIW are also specifically supported by Policy EL6 which discusses the Central Spine and Central Spine Corridor and states that the Council aims to "*work with its partners and stakeholders to implement the Central Spine and maximise connectivity across Meridian Water*". The ELAAP makes clear how the Central Spine is fundamental to the development proposals for Meridian Water. It requires that development proposals that include part of the Central Spine Road must amongst other things:

- (a) *Support the delivery of a continuous link route across Meridian Water and beyond;*
- (b) *Incorporate the Central Spine in the design;*
- (c) *Prioritise the route as the primary route for orientation, navigation and connectivity at Meridian Water;*
- (d) *Show how other routes provide connectivity to the Central Spine and enable connectivity within and beyond Meridian Water;*
- (e) *Demonstrate how resident and employee access to supporting uses is maximised, including retail, health centres, open space and schools;*
- (f) *Demonstrate how the Central Spine..... will act as the trunk route for servicing and subterranean infrastructure, including details of how the routes will positively and proactively connect to the Central Spine route and servicing on adjacent sites;*

4.14 The ELAAP defines a safeguarded corridor for the route of the Central Spine Road.

4.15 Chapter 14 of the ELAAP provides policy support for the Council's approach to land assembly at Meridian Water. Specific recognition is given to the importance of a comprehensive regeneration and the use of CPO powers to enable effective delivery of the development. It also highlights at paragraph 14.2.8 the importance of infrastructure where it states:

*"[L]and in some key parts of the site is fragmented between several owners. To deliver the infrastructure needed to develop Meridian Water in an effective and timely way, greater control over land and delivery is required. This relates particularly to delivery of the Central Spine as the key linking element".*

#### 4.16 **Meridian Water: Investing in Enfield's Future**

4.17 The Meridian Water Regeneration Framework, titled "Investing in Enfield's Future" was endorsed by the Council's Cabinet on 10 February 2016 and forms the interim strategic approach to achieving sustainable development and long term growth for Meridian Water and taking the wards of Upper Edmonton and Edmonton Green out of the bottom 10% most deprived wards in England.

4.18 The Framework sets out the aims and aspirations for the future development of Meridian Water over a 40 year timespan. The Action Plan, appended to the Framework, serves as a matrix to help measure performance of the development against six themes or "action areas" ranging from lifestyle to sustainable infrastructure and energy.

#### 4.19 **The London Plan**

4.20 The Mayor of London's revised London Plan was formally adopted in March 2016 and was updated in January 2017. It provides a strategic spatial strategy within Greater London and forms part of the Council's development plan. The Plan sets out a number of objectives to: optimise the potential of development sites; make the most sustainable and efficient use of land, particularly in areas of good public transport; improve the quality of life; deliver high quality new homes; mitigate and adapt to climate change; and secure a more attractive, well designed green city.

4.21 The adopted Plan policy 3.3 identifies the need to provide an annual average of 42,000 additional homes across the capital each year. Paragraph 3.16b entitled 'London's housing requirements' states that "the central projection in the Strategic Housing Market Assessment indicates that London will require between approximately 49,000 (2015-2036) and 62,000 (2015-2026) more homes a year." A significant number of new homes are needed in Enfield over the coming years and decades in order to meet existing and future housing need. The minimum delivery target set for Enfield by the London Plan is 798 per annum, with Meridian Water playing a key role in contributing to this.

4.22 The London Plan – Intention to Publish version looks set to increase housing delivery targets to 66,000 additional homes per annum. A significant number of homes are needed in Enfield over the coming years in order to meet current and future need. The Council's average housing delivery target under the London Plan – Intention to Publish version sets 10-year target for net housing completions of 12,460.

4.23 Policy 2.13 of the adopted London Plan refers to "opportunity areas" and Policy SD1 Opportunity Areas is included in the Intention to Publish version dated December 2019 of the emerging London Plan which have been identified as they are capable of accommodating substantial numbers of new homes and employment and seek to ensure the areas' potential is optimised. The Upper Lee Valley (in which Meridian Water is situated) is identified in London Plan policy 2.13, supported by London Plan annex one, as an opportunity area.

- 4.24 In October 2015, the GLA designated Meridian Water one of twenty new housing zones in London, unlocking funding for key infrastructure and enabling works, including the station, remediation and a Central Spine Road.
- 4.25 **Upper Lee Valley Opportunity Area Planning Framework**
- 4.26 The Upper Lee Valley Opportunity Area Planning Framework (adopted July 2013) covers circa 3,900 hectares shared between the London Boroughs of Enfield, Haringey, Waltham Forest and Hackney. The headline objectives for the Upper Lee Valley include:
- 4.26.1 Over 15,000 new jobs by 2031; and
- 4.26.2 Over 20,100 new well designed homes by 2031.
- 4.27 Meridian Water, roughly in the centre of the opportunity area and at the junction of three London Boroughs, is identified as a growth area. Chapter 7.2 specifies the following principles for Meridian Water:
- 4.27.1 Realising the scale of opportunity and the opportunity of scale;
- 4.27.2 Delivering 5,000 new homes; and
- 4.27.3 Facilitating economic growth: delivering at least 3,000 new jobs of varied types.
- 4.28 The Scheme helps deliver on the potential of this regional strategic opportunity area.
- 4.29 **National Planning Policy Framework**
- 4.30 The National Planning Policy Framework (**NPPF**) (February 2019) sets out the Government's policies on planning and how these are expected to be applied. The NPPF makes it clear that the purpose of the planning system is to contribute to the achievement of sustainable development and that there are three dimensions to sustainable development: economic, social and environmental and that planning authorities should seek opportunities to achieve the promotion of these dimensions. The NPPF encourages the use of sustainable and non-car modes of travel. The Council's proposals for Meridian Water are in accordance with the NPPF in terms of the emphasis on urban regeneration and the efficient re-use of brownfield land in order to create sustainable development in line with economic, social and environmental objectives to improve people's quality of life. The emphasis on community involvement; creating a sustainable community in a high quality, safe and healthy local environment where people want to live; contributing to the promotion of urban renaissance and improvement of quality of life and access to jobs; building a socially inclusive community with a mix of housing; and improving the link between land use and transport are all in line with the NPPF aim of sustainable development. The proposals secure net gains across the economic, social and environmental objectives of sustainable development enshrined in the NPPF.
- 4.31 **Mayor's Transport Strategy (Greater London Authority, 2018)**
- 4.32 The Mayor's Transport Strategy (**MTS**) details measures to allow Londoners to reduce their dependence on cars by providing viable and attractive alternatives.
- 4.33 Chapter 4, "A good public transport experience", of the MTS states that "*buses play a unique role in the life of London – they are the most accessible form of public transport,*

*and they provide the widest and densest network of travel options for distances that are too long to walk or cycle” (page 155, paragraph 1).*

4.34 Policy 15 of the MTS directly concerns the provision of bus services: *“the Mayor, through TfL and the boroughs, and working with stakeholders, will transform the quality of bus services so that they offer faster, more reliable, accessible, comfortable and convenient travel by public transport, while being integrated with, and complementing, the rail and Tube networks” (page 155, Policy 15).*

4.35 The MTS also states that “new types of services, including high-quality bus transit, can unlock new areas for development” (page 235, paragraph 2). The MTS asserts several proposals to achieve this aim which include:

4.35.1 Proposal 90: *“The Mayor, through TfL and working with the boroughs, will complement major transport infrastructure investment with improvements to local bus services, bus priority and bus infrastructure in order to enable high-density development over a larger area and thus spread the benefits of the infrastructure investment further”;*

4.35.2 Proposal 91: *“The Mayor, through TfL and the boroughs, will pilot bus transit networks in outer London Opportunity Areas with the aim of bringing forward development, either ahead of rail investment or to support growth in places without planned rail access. Consideration will be given to pilots at locations including Bexley/Greenwich, Enfield, Havering and Hounslow”.*

4.36 The transport strategy of the Scheme, which is facilitated by the SIW, allows conformity with the MTS.

4.37 **Healthy Streets for London (Transport for London, 2017)**

4.38 Healthy Streets for London (Transport for London, 2017) is TfL’s adopted framework for the development of policies and strategies to help Londoners use cars less and walk, cycle and use public transport more. This was the framework used when the Mayor’s Transport Strategy (2018) was created. Healthy Streets has been incorporated into design of the SIW.

4.39 **Guidelines for Planning Bus Services (Transport for London, 2012)**

4.40 To help achieve the goals of the Mayor’s Transport Strategy, TfL produced Guidelines for Planning Bus Services (Transport for London, 2012).

4.41 The document states the following objective: *“a comprehensive network should be provided ensuring that people have access to their local amenities such as shops, hospitals, schools and transport interchanges” (page 7, section 33).* To achieve this objective, several guidelines have been outlined:

4.41.1 *“In residential areas, it is desirable for the bus network to run within about five minutes walk of homes, if this is cost-effective and if roads are suitable. This is about 400 metres at the average walking speed.*

4.41.2 *The 400 metre guideline will be used alongside other indicators of accessibility to the network. These may for example be demographic, such as low car*

*ownership, or physical, such as steep hills, parkland or severance due to main roads.*

4.41.3 *In town centres, passengers should be taken close to the places they want to reach - shopping centres, rail stations, etc. At the same time, however, complicated or indirect service routeings should be avoided.*

4.41.4 *Effective interchange is essential to achieving a comprehensive network, as there will not be a direct bus link for every journey. Interchange opportunities will be taken into account in service design. In particular, good interchange facilities in town centres are important given that town centres form the hubs of the bus network’.*

4.42 The Central Spine Road and Leaside Link Road are key to meeting the guidelines on bus services as described in detail above.

## 5 **The Council’s Power to Acquire Land Compulsorily**

5.1 Section 226 (1) (a) of the 1990 Act enables the Council to acquire land compulsorily in order to facilitate the carrying out of development, redevelopment or improvement on or in relation to land in its area. Section 226 (1) (a) is subject to sub-section (1A) which provides that the Council must not exercise the power unless it thinks that the proposed development, redevelopment or improvement is likely to contribute to the achievement of the promotion or improvement of the economic and/or social and/or environmental well-being of its area.

5.2 Section 226(3)(a) enables the Council to acquire any land adjacent to land falling within sub-section (1) which is required for the purpose of executing works for facilitating the development or use of land within the Council’s area.

5.3 Acquisition of the Order Land is necessary in order to implement the SIW. The SIW will make a significant contribution to the environmental, social and economic well-being of the Upper Edmonton area, as well as the borough generally, meeting the objects of Section 226 (1A) of the 1990 Act.

5.4 Section 13 of the 1976 Act enables the Council to acquire any such new rights over the land as are specified in the Order. New rights are required for the delivery of the SIW and their subsequent maintenance.

5.5 Paragraph 95 to Section 1 of the Guidance explains that the Section 226 powers in the 1990 Act are intended to provide a positive tool to help acquiring authorities with planning powers assemble land where this is necessary to implement proposals in their Local Plan. In the case of the Scheme and the SIW, the relevant Local Plan is the Core Strategy and the ELAAP.

5.6 The Guidance provides recommendations to acquiring authorities on the use of compulsory purchase powers and the Council has taken full account of this Guidance in making this Order.

5.7 The Council has been successful in acquiring a substantial part of the Order Land by agreement (as well as other land forming part of the Scheme). However it will not be practicable to agree terms for the acquisition of all of the remaining interests in the Order

Land to ensure land assembly and enable delivery of the SIW within a reasonable timeframe. This is particularly the case given there are unknown interests.

5.8 Having regard to the nature of the proposals and the advice set out in the Guidance, the Council is satisfied that the use of its compulsory purchase powers under Section 226(1)(a) and Section 226(3)(a) of the 1990 Act is justified in order to achieve its objectives.

## 6 **Justification for the Use of Compulsory Purchase Powers**

6.1 By way of brief background, the Council is working towards delivery of the SIW by March 2024.

6.2 The need for the SIW is explained at section 3 above.

6.3 The development of the SIW will contribute to the achievement of the objects specified in Section 226(1A) of the 1990 Act as explained in section 5 above.

6.4 The proposals for SIW comply with existing and emerging local planning policy, the London Plan and the NPPF, as explained in section 4 above.

6.5 Vistry Partnerships have been selected as development partner for part of Phase 2, the former gasholder site and the Council intends to finalise the contractual arrangements in summer 2020. To deliver further development within Phase 2 and later Phases the Council will embark on a similar robust exercise to select preferred delivery methods. The Council does not consider that the purpose of the Order could be achieved more effectively by any alternative means.

6.6 Paragraph 106 of the Guidance identifies four factors of particular relevance to CPOs under section 226 of the 1990 Act which will be taken into account by the Secretary of State when deciding if the powers should be confirmed. Each of these is considered below.

### 6.7 **Whether the purpose for which the land is being acquired fits with the adopted planning framework for the area**

6.8 The proposed Order is to enable the SIW to be constructed to facilitate the regeneration of Meridian Water in accordance with the planning framework described in section 4 of this statement.

6.9 The Council is therefore satisfied that the Scheme, and the SIW to facilitate it, are in accordance with the strategic objectives of national, London and local policies set out in the adopted Development Plan and other emerging planning policy documents.

### 6.10 **Contribution to the social, economic and environmental well-being of the area**

6.11 The SIW will contribute to the *economic well-being* of the Council's area by facilitating regeneration of Meridian Water. The main economic benefits will be:

6.11.1 a Scheme value of c.£6bn;

6.11.2 the creation of approximately 1,500 net new full-time jobs and thousands of jobs during construction with opportunities for apprenticeships for local people;

- 6.11.3 increased economic activity by reason of increased employment and expenditure during the construction phase of the Scheme; and
  - 6.11.4 increased economic activity by reason of increased employment and expenditure during the operational phase of the Scheme and the introduction of expanded residential uses.
- 6.12 Promotion or improvement of *social well-being* will be achieved by:
- 6.12.1 provision of new, well-designed, energy-efficient homes that will meet the needs of residents now and in the future;
  - 6.12.2 provision of around 5,000 new homes with the potential for a further 5,000;
  - 6.12.3 the provision of c. 43% affordable housing on a habitable rooms basis (in relation to the Phase 2 development);
  - 6.12.4 shaping the new neighbourhood and giving it a distinct new character with a high quality design led approach to planning applications guided by the ELAAP with a focus on open spaces and waterside living; and
  - 6.12.5 improved pedestrian, cycle and vehicular access links to improve permeability and to foster the creation of a healthy and safe community.
- 6.13 Promotion or improvement of *environmental well-being* will occur through enhancement of the townscape through the replacement of outdated buildings with a contemporary and well-designed residential development. The public realm will be improved within the Scheme. The main environmental benefits are:
- 6.13.1 redevelopment of a brownfield site;
  - 6.13.2 increased housing density appropriate to the increased and sustainable transport connectivity of the area due to the Meridian Water station, increased train service, increased bus capacity through the Central Spine consistent with the London Plan (adopted and emerging) and NPPF targets for optimising density;
  - 6.13.3 creating new employment opportunities close to people's homes;
  - 6.13.4 visual and ecological improvements to existing water courses; and
  - 6.13.5 provision of efficient layouts and high quality public open space, community and recreational facilities.
- 6.14 For the above reasons, the well-being tests set out in Section 226(1A) are fully satisfied in respect of the CPO as made and submitted for confirmation.
- 6.15 **Whether the purpose for which the acquiring authority is proposing to acquire the land could be achieved by any other means.**
- 6.16 The SIW facilitate the regeneration of Meridian Water. That regeneration faces a number of major obstacles; most pertinent is delivering infrastructure necessary to enable development of large mix used schemes. The Council has undertaken a comprehensive

investigation of the options for the SIW necessary for Meridian Water and it has determined the design of the SIW proposed is the only viable means to achieve the planning policy objectives. The need for each element of the SIW is explained in section 3, which demonstrates both the overall need for the infrastructure and the specific reason for scale and location of the infrastructure proposed.

6.17 **Potential viability of the Scheme and general indication of funding intentions**

6.18 The compensation payable as a result of the Order will be met by the Council from its general fund. The Council having considered advice about the estimated liability for the compensation, is satisfied it has the resources to pay all compensation arising out of the Order.

6.19 With regard to the costs of constructing the works the Council has secured £156m HIF funding from MHCLG (of which £116m is allocated to the SIW subject to this Order, with the remaining £40m allocated to the rail enhancement works). A grant funding agreement will be entered into with MHCLG. Negotiations on this are progressing and the Council does not consider there are any obstacles to securing this funding. Having taken independent advice, the Council is satisfied it has sufficient funds available for the construction of the SIW subject to this Order.

6.20 The Council will itself arrange for construction of the SIW and is in the process of procuring contractors for this work.

7 **Efforts to Acquire by Agreement**

7.1 The Council owns the land required for the Phase 2 development having acquired it by private treaty agreement. The Council has also acquired other land interests within the Meridian Water boundary which to date equates to 74% of the developable area within Meridian Water.

7.2 The Order is intended solely to enable the acquisition of land and rights required for the SIW. The Council and its land agents have been in contact with all landowners and occupiers to progress negotiations for the acquisition of interests and offers have been made. The Council will continue in its attempts to acquire interests by agreement with all parties who are willing to negotiate.

7.3 Genuine and sustained efforts have been made to acquire all the land and rights required for the SIW. In accordance with best practice, the Council will continue to endeavour to reach negotiated settlement and these efforts will continue in parallel with making the formal CPO process and continue after the Order is made.

7.4 In respect of business occupiers of the Order Land, there is only one business with a protected tenancy affected by the Order and discussions are ongoing with this business. The remaining businesses are occupying pursuant to non-protected tenancies and the Council have been in regular dialogue with these businesses to make them aware of the Order

7.5 In relation to plots included in the Order of which the owners cannot be traced, the Council's advisers have examined details held at the Land Registry and Land Charges Department concerning these plots, and the Council has posted site notices in close proximity to the plots in question to try and obtain further information using its powers

under section 16 of the 1976 Act and section 5A of the Acquisition of Land Act 1981. The Council considers it has made sufficient enquiries to identify any owners.

7.6 Given the number of interests identified in the Schedule to the Order and the unknown interests, it is unlikely that the Council will be able to acquire all of them by agreement within a reasonable period. The use of compulsory purchase powers is therefore necessary.

## 8 **Other Considerations**

### 8.1 **Highway Land**

8.2 The River Lee Navigation canal towpath forms part of National Cycle Route 1 and is a Public Right of Way. Temporary diversions during construction may need to be implemented but the existing routes will be restored at the conclusion of the works.

8.3 An unused bellmouth located along Argon Road is public highway and this will be stopped up to allow remediation of the area. This will be subject to a stopping up order application under section 247 of the 1990 Act.

### 8.4 **Open Space**

8.5 Within the Order Land are areas of open space within the definition of section 19 of the 1981 Act which comprise part of the River Lee Navigation canal and towpath (plot numbers: 102, 104, 105, 106, 109 and 112) (the **Canal and Towpath**).

8.6 Plots 102, 104 and 105 relate to the acquisition of new rights required to construct a new bridge over the Canal to accommodate a carriageway built to adoptable standards, along with rights for the maintenance, repair and use of the new bridge for the purposes of vehicular and pedestrian traffic.

8.7 Plot 106 relates to acquisition of land forming part of the Towpath for the construction of a flood relief channel beneath the Towpath.

8.8 Plot 109 relates to the acquisition of new rights for construction of the bridge, flood mitigation works and public realm and accessibility improvements, along with rights for the maintenance, repair and use of the new bridge for the purposes of vehicular and pedestrian traffic.

8.9 Plot 112 relates to the acquisition of new rights required for the purposes of flood mitigation works, along with rights for the maintenance and repair of the flood mitigation works.

8.10 These works have been the subject of extensive discussions with the Canal and River Trust, who own and manage the Canal and Towpath, to ensure that the continued use and enjoyment of the land by the public is preserved. The Canal and River Trust have also been consulted on the planning applications that relate to these works and the representations made during the planning application process have been addressed.

8.11 The acquisition of land and rights by the Council will not impact the continued use of the Canal and Towpath for recreation and all purposes for which the land is currently and ordinarily used. Public rights currently exercised are the use of the Canal for

travel/mooring by canal boats and the Towpath is a public right of way used both as a mode of travel but also for recreational walking and cycling. The Towpath is designated as National Cycle Route 1. All activities will be unaffected by the Order. The design of the bridge ensures that the use of the Towpath is unaffected. The construction of the works may require a temporary closure of the Towpath however this will be subject to a separate procedure via an application to the highways authority under the Road Traffic Regulation Act 1984.

8.12 A separate application has been made to the Secretary of State under section 19 and Schedule 3 of the 1981 Act to certify that:

8.12.1 **Plots 102, 104 and 105 when burdened with new rights will be no less advantageous to the persons in who it is vested and to the public than it was before (Schedule 3, Paragraph 6(1)(a) of the 1981 Act)**

8.12.2 The new rights relate to the construction of a bridge for the purposes of public vehicular and pedestrian traffic. The rights to enter the land for the purpose of maintenance, repair and public use of the bridge are also sought.

8.12.3 The bridge has been designed to accommodate all existing uses of the Canal and Towpath, taking into account the requirements of the Canal and River Trust.

8.12.4 The land after acquisition of these rights will be no less advantageous to the Canal and River Trust (in whom it is vested) and the public than it was before. All existing public and private uses of the Canal and Towpath will remain unaffected by the construction and use of the new bridges.

8.12.5 Implementing accessibility improvements to the Canal (and other waterways in this area) is one of the key aims of the Meridian Water regeneration. A new bridge in this location will assist with wider connectivity of the new development (and surrounding areas) with the open space. This will result in an increase in accessibility and public enjoyment of the Canal and Towpath.

8.12.6 A condition attached to the SIW planning permission which authorises construction of the bridge (ref: 19/02717/RE3) requires a survey of the condition of the Canal waterway wall to be undertaken, a schedule of repairs required and evidence that such works have been completed to be submitted to and approved in writing by the local planning authority. A bridge risk assessment is also secured by a separate condition. This will ensure that any potential impact of the construction of the bridge on the Canal and its infrastructure is mitigated.

8.12.7 **Plots 109 and 112 when burdened with new rights will be no less advantageous to the persons in who it is vested and to the public than it was before (Schedule 3, Paragraph 6(1)(a) of the 1981 Act)**

8.12.8 The Council also seeks to acquire new rights over approximately 407 square metres of open space identified as Plots 109 and 112 in the Schedule to the Order and the Order Map (130 square metres and 277 square metres respectively). The land subject to this application is owned by the Canal and River Trust and forms part of the Canal Towpath.

- 8.12.9 Plot 109 includes the continuation of the new bridge discussed above in relation to Plots 102, 104 and 105. The same rights are therefore sought and the justification for seeking those rights applies equally to this application in relation to Plot 109. The bridge will be constructed in the air space above Plot 109 and no bridge abutments will be installed on the Towpath.
- 8.12.10 In addition, rights are also sought on Plot 109 to enable construction of accessibility and public realm improvement works along the Towpath around the landing of the new bridge, including the closure of a section of the Towpath to vehicular traffic and accessible links from the Towpath to the new bridge. Works may also be required to reinforce walls along with Canal to accommodate the new bridge. The works will improve the quality and connectivity of the Towpath around the area of the new bridge. As mentioned above, planning conditions will ensure works to the Canal associated with the new bridge are appropriately carried out and the acquisition of these rights ensures that the Council has the ability to undertake any such works to the Canal.
- 8.12.11 In relation to Plot 112 the new rights are required to install a low level flood mitigation barrier adjacent to the Towpath. The rights to enter the land for the purpose of maintenance and repair and of the barrier are also sought. This barrier is required to mitigate the increase in flood risk caused by the development in the adjacent industrial area. The flood restraint barrier would not impact on visual amenity within the street scene or neighbouring amenity. The flood mitigation barrier will also extend on to Plot 109.
- 8.12.12 The installation of the flood barrier will be alongside the Towpath attached to the existing crash barrier to provide a continuous flood barrier. The barrier has minimal impact on the width of the Towpath as such the installation will not affect the ongoing use or operation of the Towpath for the benefit and enjoyment of the Canal and River Trust or the public. The Towpath's status as a public right of way and part of National Cycle Route 1 is not affected by the works or by the Order.
- 8.12.13 The works on Plots 109 and 112 do not affect or impact the continued use of the Towpath for all purposes. In addition the public realm and accessibility improvements as well as the connectivity benefits of the new bridge mean that acquisition of the new rights will increase the opportunities for the public to use and enjoy the open space. As such the open space when burdened with new rights will be no less advantageous to the persons in whom it is vested and to the public than it was before.
- 8.12.14 **Plot 106: the acquisition of land in respect of Plot 106 does not exceed more than 209 square metres (250 square yards) in extent and that the giving of exchange land is unnecessary (section 19(1)(b) of the 1981 Act)**
- 8.12.15 The Council seeks to acquire all interests in approximately 58 square metres of open space. The land falls within the ownership of the Canal and River Trust and forms part of the Towpath. As part of the regeneration the Council proposes to undertake flood alleviation works which will facilitate residential development on the remainder of the Meridian Water. As part of these works a

flood relief channel will be created between the Canal and the proposed flood compensation areas on Edmonton Marshes (Plots 127-135 (inclusive) and 137 on the Order Map). Acquisition of Plot 106 is required for the construction of a flood relief channel below the Towpath and for the future maintenance and protection of that flood relief channel.

- 8.12.16 The flood relief channel will be developed underneath the Towpath and will not affect the ongoing use or operation of the Towpath for the benefit and enjoyment of the Canal and River Trust or the public. The Towpath's status as a public right of way and part of National Cycle Route 1 is not affected by the works or by the Order. It will also not affect the appearance of the Towpath. As such the giving of exchange land is unnecessary.
- 8.13 Implementing accessibility improvements to the Canal (and other waterways in this area) is one of the key aims of the regeneration. A new bridge in this location will assist with wider connectivity of the new development (and surrounding areas) with the open space. These works will result in an increase in accessibility and public enjoyment of the Canal and Towpath.
- 8.14 Overall with SIW and Phase 2 development there will be a net increase in the open space within Meridian Water, as well as the accessibility and qualitative improvements to the open space consisting of the Canal and Towpath.
- 8.15 **Utilities**
- 8.16 Gas mains underneath Plot 92 are owned by Cadent Gas Limited. These mains lead to a gas governor on plot 93 which is proposed to be relocated as part of the SIW. These mains will therefore become redundant and re-routed to the relocated gas governor (see paragraph 8.13 below).
- 8.17 Plot 93 is owned by Cadent Gas Limited and includes a gas governor it is proposed to relocate this as part of the Phase 2 planning permission to alternative locations within Meridian Water. Proposals for the relocation are being discussed with Cadent Gas Limited.
- 8.18 Plot 94 is the location of a substation operated by Eastern Power Networks which is proposed to be relocated as part of the Phase 2 planning permission to an alternative location within Meridian Water. Proposals for the relocation will be discussed with Eastern Power Networks.
- 8.19 Plot 108 is owned by Eastern Power Networks and plot 110 is the location of a substation operated by Eastern Power Networks. From the Council's investigations it appears plot 108 was the intended location for the substation but in practice the substation was installed in plot 110. There is no substation located in plot 108. Proposals for the relocation will be discussed with Eastern Power Networks.
- 8.20 Plot 133 is owned by Thames Water Utilities Limited who contend this area is 'operational land' being necessary to carry out its statutory functions in accordance with the Water Industry Act 1991. Plot 133 has underground water pipes used by Thames Water Utilities Limited. The Council does not consider the existence of pipes under this land to be sufficient evidence that the land is necessary to carry out Thames Water's statutory functions. The Council has asked Thames Water Utilities Limited to provide evidence to

demonstrate that Plot 133 was acquired for the purposes of its undertaking, but to date no information has been received. As such the Council has not described this Plot in the Order as special category land. In any case the Council considers plot 133 can be acquired without serious detriment to the carrying on of the statutory undertaking of Thames Water. The Council has designed the flood alleviation works (see section 3 above) so that the excavation and lowering of ground levels will be carried out avoiding Thames Water's underground pipes and apparatus. Access will be maintained to the underground pipes to allow Thames Water to maintain its apparatus during the flood alleviation works and earthworks and after the works are completed.

- 8.21 In addition, there is an electricity pylon sited on plot 133 which is connected to overhead power cables operated by National Grid Electricity Transmission plc. The overhead cables also oversail plots 131, 132 and 135. The excavation works will exclude the area occupied by the pylon and the National Grid apparatus will remain in-situ and will be unaffected by the works.
- 8.22 In addition the Council's searches have revealed further electricity substations within Plot 39 and Plot 72. Diligent enquiries with statutory undertakers and investigations indicate that these are private substations. There is no indication that either substation was acquired by a statutory undertaker for the purposes of its undertaking, as such the Council does not consider these to be special category land.

## 9 Human Rights Considerations

- 9.1 Section 6 of the Human Rights Act 1998 prohibits public authorities from acting in a way which is incompatible with the European Convention on Human Rights (**ECHR**). Articles 6 and 8 and Article 1 of the First Protocol are potentially relevant to the compulsory purchase of land:-

9.1.1 Article 6 provides that everyone is entitled to a fair and public hearing in the determination of his civil rights and obligations.

9.1.2 Article 8 provides that everyone has the right to respect for his private and family life and that there shall be no interference by a public authority with the exercise of this right except in accordance with the law, where there is a legitimate aim and where it is fair and proportionate in the public interest.

9.1.3 Article 1 of the First Protocol provides for the peaceful enjoyment of possessions (including property) and that no one shall be deprived of possessions except in the public interest and subject to the conditions provided for by law.

- 9.2 It is well settled that the compulsory purchase of land is not contrary to the ECHR if it is undertaken in the public interest and in accordance with the law and procedures laid down by statute. The requirements of the ECHR are reflected in paragraphs 12 and 13 of Guidance:

*"12. A compulsory purchase order should only be made where there is a compelling case in the public interest.*

*An acquiring authority should be sure that the purposes for which the compulsory purchase order is made justify interfering with the human rights of those with an interest in*

*the land affected. Particular consideration should be given to the provisions of Article 1 of the First Protocol to the European Convention on Human Rights and, in the case of a dwelling, Article 8 of the Convention”.*

*“13. The minister confirming the order has to be able to take a balanced view between the intentions of the acquiring authority and the concerns of those with an interest in the land that it is proposing to acquire compulsorily and the wider public interest. The more comprehensive the justification which the acquiring authority can present, the stronger its case is likely to be.*

*However, the confirming minister will consider each case on its own merits and this guidance is not intended to imply that the confirming minister will require any particular degree of justification for any specific order. It is not essential to show that land is required immediately to secure the purpose for which it is to be acquired, but a confirming minister will need to understand, and the acquiring authority must be able to demonstrate, that there are sufficiently compelling reasons for the powers to be sought at this time.”*

- 9.3 In making this Order, the Council considers that there is a compelling case in the public interest to enable the Council to acquire the Order Land.
- 9.4 No plots within the Order Land contain residential properties and only one business needs to be compulsorily acquired as a result of the Order or the SIW. The Council is in discussions with that business.
- 9.5 Impacts on existing business will be mitigated by the Council. Measures to minimise detrimental impact upon access for IKEA and the Arriva Bus depot are explained above in section 3. The Council has also engaged in a significant programme of dialogue with existing business to understand and appropriately mitigate any effects during construction.
- 9.6 The Council is of the view, therefore, that the need to acquire the Order Land in the public interest outweighs any detrimental impact upon persons having interest in any of the Order Land, and consequently that the Order is compatible with the ECHR.

## 10 **Public Sector Equality Duty**

- 10.1 The Council has had due regard to the considerations listed in section 149 of the Equality Act 2010 and has taken this into account in the assessment of the Order.
- 10.2 An Equalities Impact Assessment (**EQIA**) by Ottaway Strategic Management Ltd was commissioned by the Council to consider the impacts of the scheme. The EQIA concluded that there are no direct negative equality impacts identified against any of the protected characteristics. However, there are some protected characteristics who are likely to experience proportionately higher consequences of the Scheme and these are:
  - 10.2.1 White other staff, including Eastern European, Turkish and Greek;
  - 10.2.2 BAME Staff;
  - 10.2.3 Women in properties in third party ownership; and
  - 10.2.4 Older members of the workforce potentially less able to re-engage in the labour market if their jobs are lost to the relocation programme.

- 10.3 The EQIA proposed several mitigation measures to address these indirect impacts which the Council intends to implement as the Scheme progresses.
- 10.4 The EQIA also acknowledges significant potential positive impacts of the Scheme resulting from the Order (discussed above in section 6 but including for example, new homes, social infrastructure and employment growth) and that these benefits will likely impact on all protected characteristics.
- 10.5 An EQIA was also prepared by the Council's Strategic Planning Team to support the ELAAP submission. The planning applications for Phase 1 and Phase 2 were each subject to an EQIA. The Phase 2 application currently pending consideration was accompanied by a socio-economic analysis as part of the Environmental Statement. No substantive negative impacts to persons or groups with protected characteristics were identified.
- 10.6 Additional regard has been given to any potential impact of the Order upon groups with the protected characteristics outlined by Section 149 of the Equalities Act 2010 and the provisions contained therein and an EQIA has been undertaken in respect of the making and subsequent implementation of the Order. The Council has considered and is implementing the suggested mitigation measures proposed in the EQIA. It is considered that due regard has been given to the impact of the SIW on all relevant groups within the protected characteristics schedule and that no equalities issues arise.

## 11 **Conclusion**

For the reasons set out in this Statement, the Council considers that there is a compelling case in the public interest for the making and confirmation of the Order.

## 12 **Details of Contacts at the Council**

- 12.1 All those owners and occupiers affected by the Order, who wish to speak to the Council's agents regarding the purchase of their interests are requested to contact:

Trowers and Hamblins LLP  
3 Bunhill Row  
London  
EC1Y 8YZ  
Tel: 0207 423 8372  
Email: [tbrown@trowers.com](mailto:tbrown@trowers.com)  
Reference: JKB.054342.00048.TPB

- 12.2 If any person affected by the Order wishes to discuss it with an officer of the Council, he/she is requested to contact:

Paul Gardner  
Meridian Water Team  
Silver Street  
Enfield  
EN1 3XA

## 13 **List of Documents**

- 13.1 In the event that it becomes necessary to hold a public inquiry into the Order, the Council may refer to the documents listed below. The list is not exhaustive and the Council may also refer to additional documents in order to address any objections made to the Order:

- The Order, Order Schedule and Order Map;
- Cabinet report and minutes of authorising the making of the Order;
- National Planning Policy Framework 2019;
- London Plan;
- The London Plan – Intention to Publish;
- The Upper Lee Valley Opportunity Area Planning Framework;
- The London Borough of Enfield Core Strategy;
- Edmonton Leaside Area Action Plan;
- Meridian Water Regeneration Framework: Investing in Enfield's Future;
- Report to Committee and Decision Notice and Section 106 Agreement relating to the Phase 1 planning permission (reference: 16/01197/RE3);
- Equalities Impacts Assessment (Ottaway Strategic Management Ltd);
- SIW planning permission (reference: 19/02717/RE3) dated 22 July 2020; and
- Documents relating to the SIW and Phase 2 planning applications with respective references 19/02717/RE3 and 19/02718/RE3 in particular:
  - Flood Risk Assessment, Arup (August 2019);
  - Transport Assessment, Arup (July 2019); and
  - Planning committee reports dated 24 March 2020.

13.2 Copies of the Order, Order Schedule, Order Map and this Statement can be inspected at the following locations:

Edmonton Green Library  
36-44 South Mall  
Edmonton Green  
London  
N9 0TN

and at [www.enfield.gov.uk/MeridianWaterCPO](http://www.enfield.gov.uk/MeridianWaterCPO)

Electronic or hard copies can be provided on request. To request copies please contact Madi Mukhametaliyev in writing at Silver St, London EN1 3XA, by telephone on 0208 132 3059 or by Email: [Madi.Mukhametaliyev@enfield.gov.uk](mailto:Madi.Mukhametaliyev@enfield.gov.uk)

## Glossary

### Definitions Used in this Statement of Reasons

**1976 Act:** Local Government (Miscellaneous Provisions) Act 1976

**1981 Act:** Acquisition of Land Act 1981

**1990 Act:** Town & Country Planning Act 1990 (as amended)

**Canal and Towpath** the River Lee Navigation and its adjacent towpath on the east bank

**Coronavirus (COVID-19): CPO Guidance** – published by the Ministry of Housing Communities and Local Government on 13 May 2020

**EA:** Environment Agency

**ECHR:** the European Convention on Human Rights

**ELAAP:** the Edmonton Leaside Area Action Plan

**Guidance:** Guidance on Compulsory Purchase and the Crichel Down Rules published in February 2018 by the Ministry of Housing Communities and Local Government (updated July 2019)

**LBH:** the London Borough of Haringey

**LVRP:** Lee Valley Regional Park

**NPPF:** the National Planning Policy Framework published 24 July 2018 and updated 19 June 2019

**Order:** the London Borough of Enfield (Meridian Water Strategic Infrastructure Works) Compulsory Purchase Order 2020

**Order Land:** the land included within the Order and is shown on the plan appended to this Statement at Appendix 1

**Council:** the London Borough of Enfield

**Meridian Water:** the area shown outlined red on the plan appended to this Statement at Appendix 2

**Meridian Water Station:** the Meridian Water railway station constructed as part of Phase 1

**MHCLG:** Ministry of Housing, Communities and Local Government

**Scheme:** the Council's proposals for regeneration of Meridian Water

**Phase 1:** the first development phase of the Scheme (forming part of Zone 1) for which planning permission was granted on 10 July 2017 under reference 16/01197/RE3 within the area shown labelled 1 on the plan appended to this Statement at Appendix 3

**Phase 2:** the second development phase of the Scheme (comprising Zone 4, 5 and part of Zone 2) for which a planning application has been made under reference: 19/02718/RE3 within the area

shown labelled 4 and 5 on the plan appended to this Statement at Appendix 3 and the details of the redevelopment shown on the plan at Appendix 5

**Secretary of State:** the Secretary of State for Housing, Communities and Local Government

**SIL:** Strategic Industrial Land

**SIW:** the strategic infrastructure works subject to the Order required to enable delivery of the Scheme for which a planning permission has been granted under reference: 19/02718/RE3 shown on the plan appended to this Statement at Appendix 4

**Zones:** the development phases of the Scheme comprising Zones 1 to 8 shown on the plan appended to this Statement at Appendix 3

**Appendix 1**

**Plan showing the extent of the Order Land**

**Appendix 2**

**Plan showing the extent of the Meridian Water Regeneration Area**

**Appendix 3**

**Plan showing the Meridian Water Development Zones**

**Appendix 4**

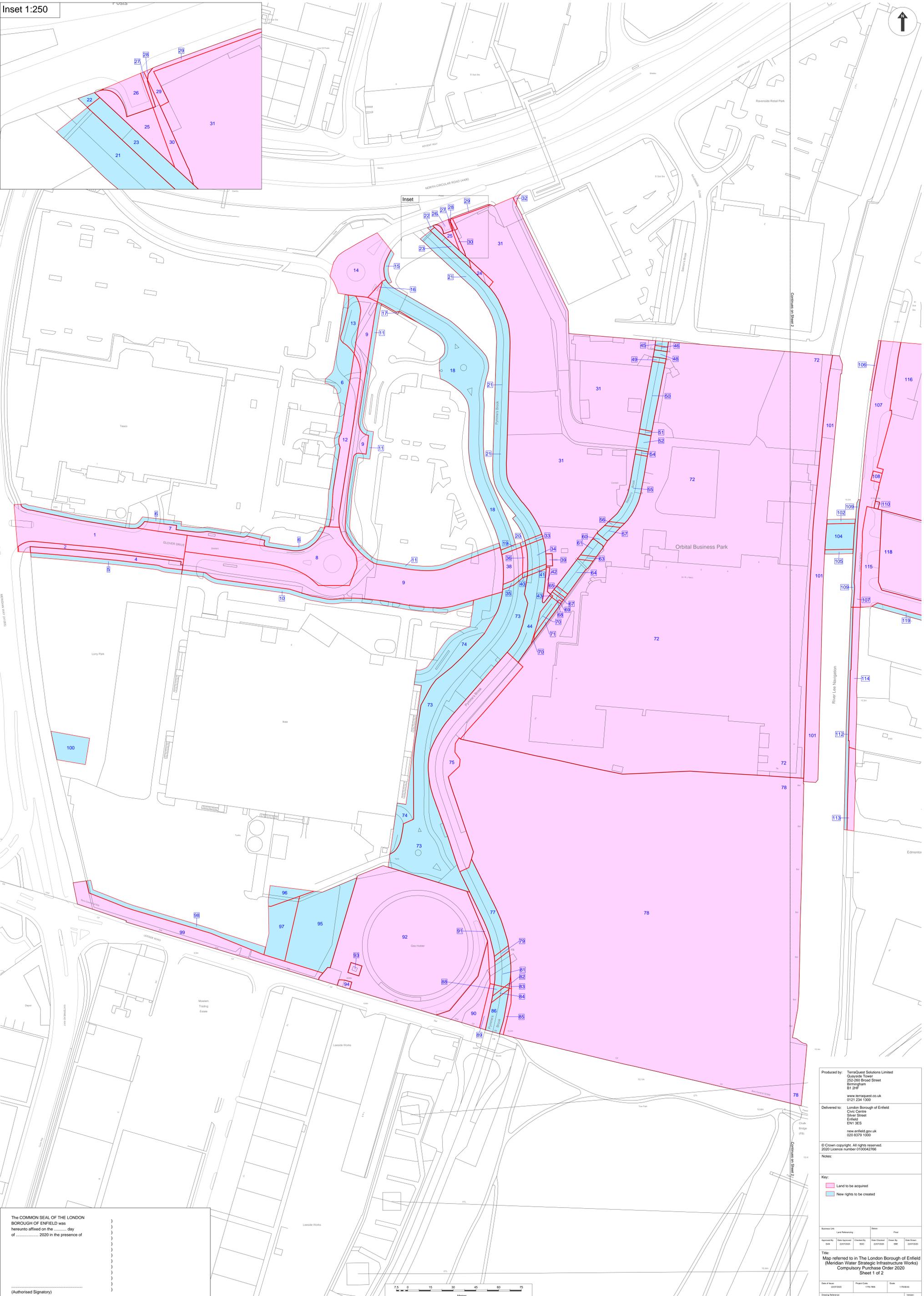
**Plan showing the Strategic Infrastructure Works**

**Appendix 5**

**Plan showing the Phase 2 Masterplan**

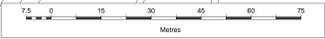
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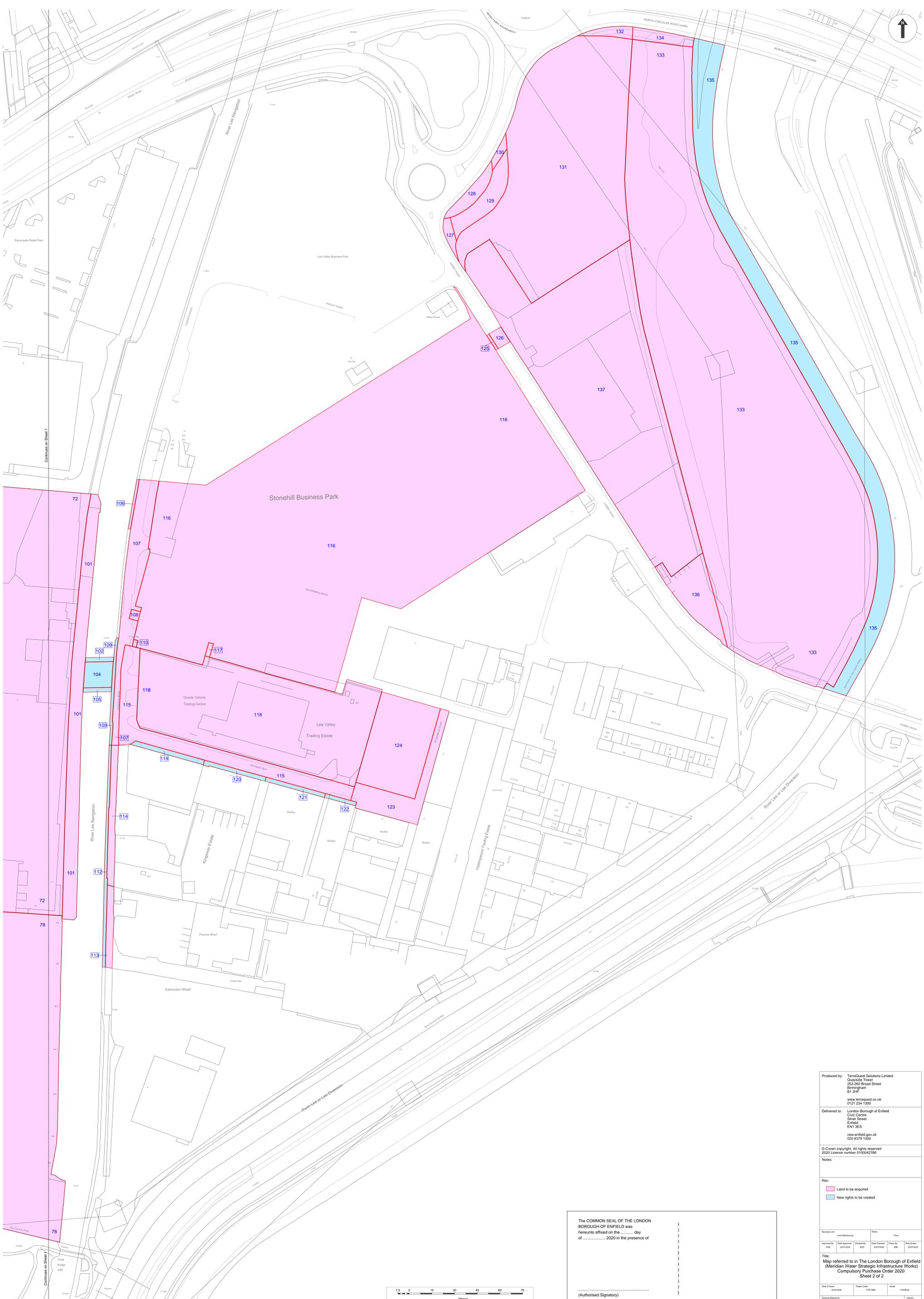
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- New rights to be created

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Date: 20/07/2020	Date: 20/07/2020	Date: 20/07/2020	Date: 20/07/2020

Title: Map referred to in The London Borough of Enfield (Meridian Water Strategic Infrastructure Works) Compulsory Purchase Order 2020 Sheet 1 of 2

Date of Issue: 20/07/2020 Project Code: 17/17/001 Scale: 1:250000  
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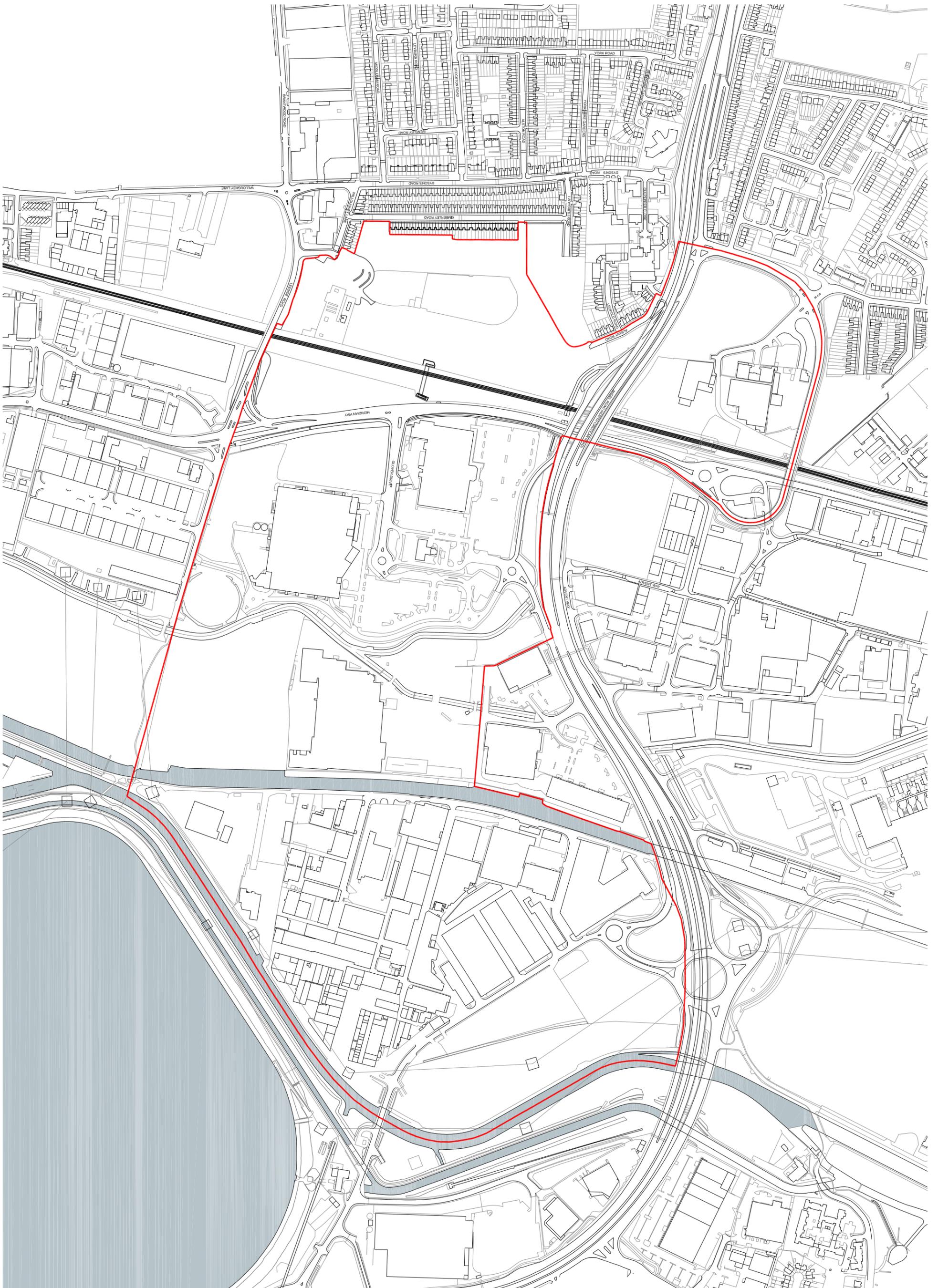
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 Compulsory Purchase Order 2020  
 Sheet 2 of 2

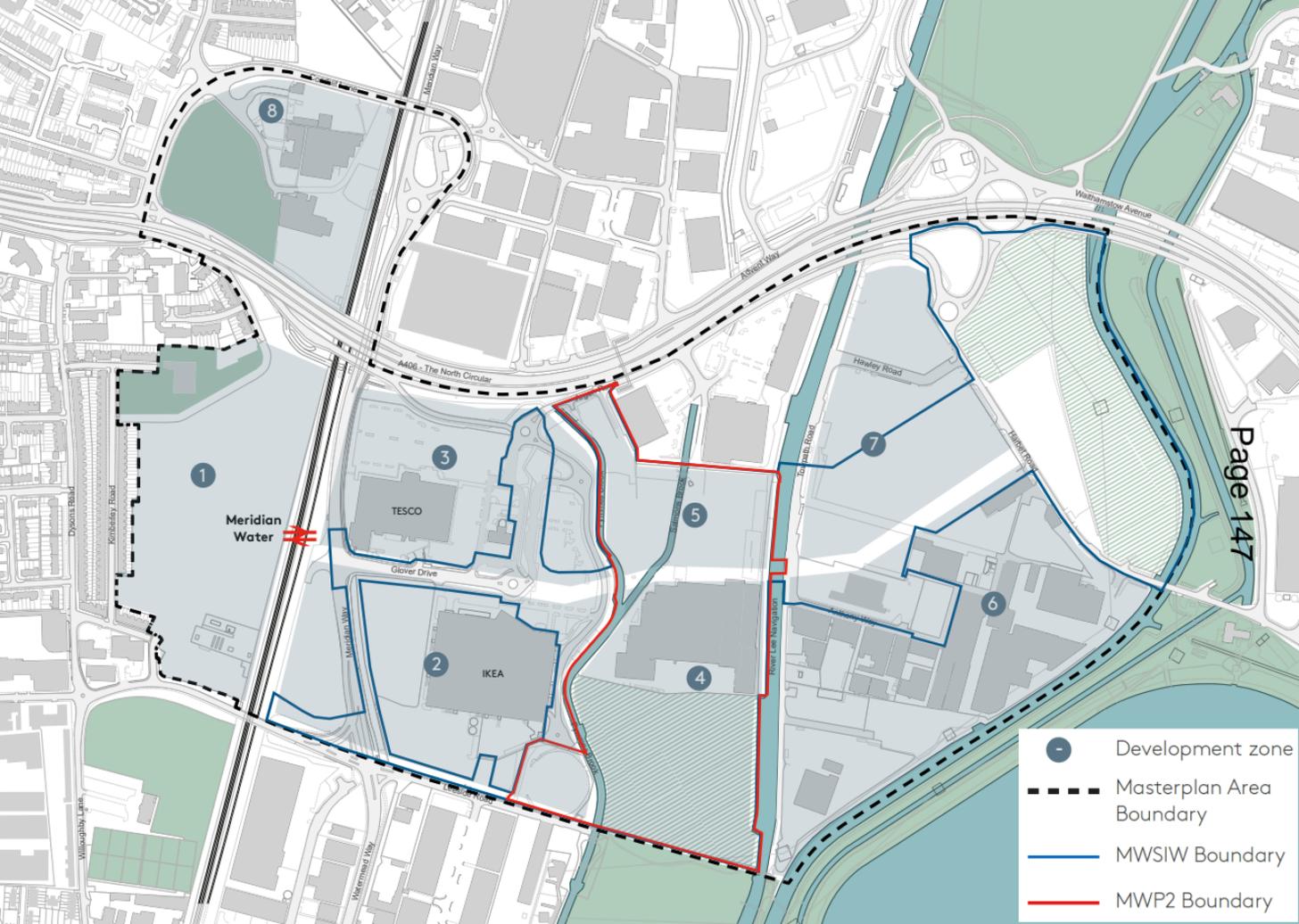
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Meridian Water

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3

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IKEA

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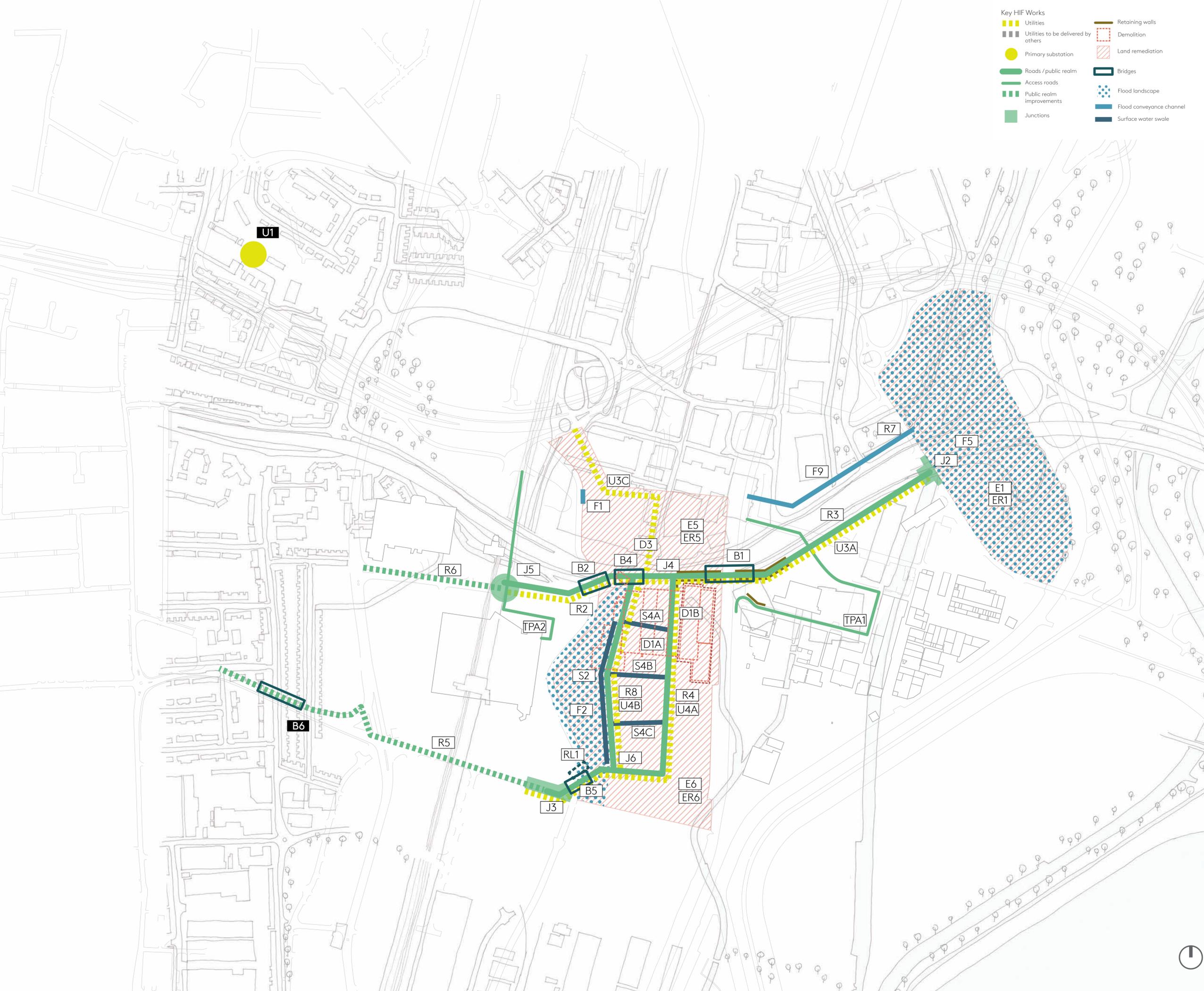
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6

- Development zone
- Masterplan Area Boundary
- MWSIW Boundary
- MWP2 Boundary

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- Key HIF Works**
- Utilities
  - Utilities to be delivered by others
  - Primary substation
  - Roads / public realm
  - Access roads
  - Public realm improvements
  - Junctions
  - Retaining walls
  - Demolition
  - Land remediation
  - Bridges
  - Flood landscape
  - Flood conveyance channel
  - Surface water swale

- Full planning application for Strategic Infrastructure Works (SIW)**  
 ■ Separate planning application
- SIW Codes**
- F1 Flood Alleviation Works to Pymmes Brook Wall
  - F2 Brooks Park and River Naturalisation
  - F5 Flood Alleviation Landscape (Edmonton Marshes)
  - F9 Flood Conveyance Channel
  - S2 Parkside Cycle Street Drainage
  - S4A East-West Drainage
  - S4B East-West Drainage
  - S4C East-West Drainage
  - B1 River Lee Navigation Bridge
  - B2 Pymmes Brook North Bridge
  - B4 Salmons Brook Bridge
  - B5 Pymmes Brook south bridge
  - B6 Leaside Road foot/cycle bridge, WALM crossing
  - U1 Primary Sub-Station
  - U3A Central Spine Road Utility Corridor
  - U3C Northern Utility Connections
  - U4A Leaside Link Road Utility Corridor
  - U4B Parkside Cycle Street Utility Corridor
  - R2 Central Spine Road (West)
  - R3 Central Spine Road (East)
  - R4 Leaside Link Road
  - R5 Leaside Road Improvements
  - R6 Glover Drive Improvements
  - R7 Flood Conveyance Channel Highway Works to Harbet Road
  - R8 Parkside Cycle Street
  - J2 Central Spine Road - Harbet Road Junction
  - J3 Leaside Link Road - Leaside Road junction
  - J4 Leaside Link Road - Central Spine Road Junction
  - J5 Central Spine Road - Glover Drive Junction
  - J6 Leaside Link Road - Parkside Cycle Street Junction
  - TPA1 Third Party Access Works - Development Zone 6
  - TPA2 Third Party Access Works - Ikea
  - D1A Demolition of BOC Sheds West
  - D1B Demolition of BOC Sheds East
  - D3 Demolition of Salmons Bridge
  - RL1 Relocation of Pymmes Bridge (Bailey Bridge)
  - E1 Earthworks - Lee Valley Regional Park
  - E5 Earthworks - Development Zone 5
  - E6 Earthworks - Development Zone 4
  - ER1 Remediation - Lee Valley Regional Park
  - ER5 Remediation - Development Zone 5
  - ER6 Remediation - Development Zone 4

**Karakusevic Carson Architects**

Project:  
 382 MW Strategic Infrastructure

Title:  
 Strategic Infrastructure Works - All

Drg No.  
 382-KCA-XX-XX-DR-A-1112-D

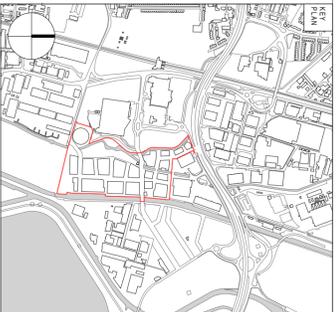
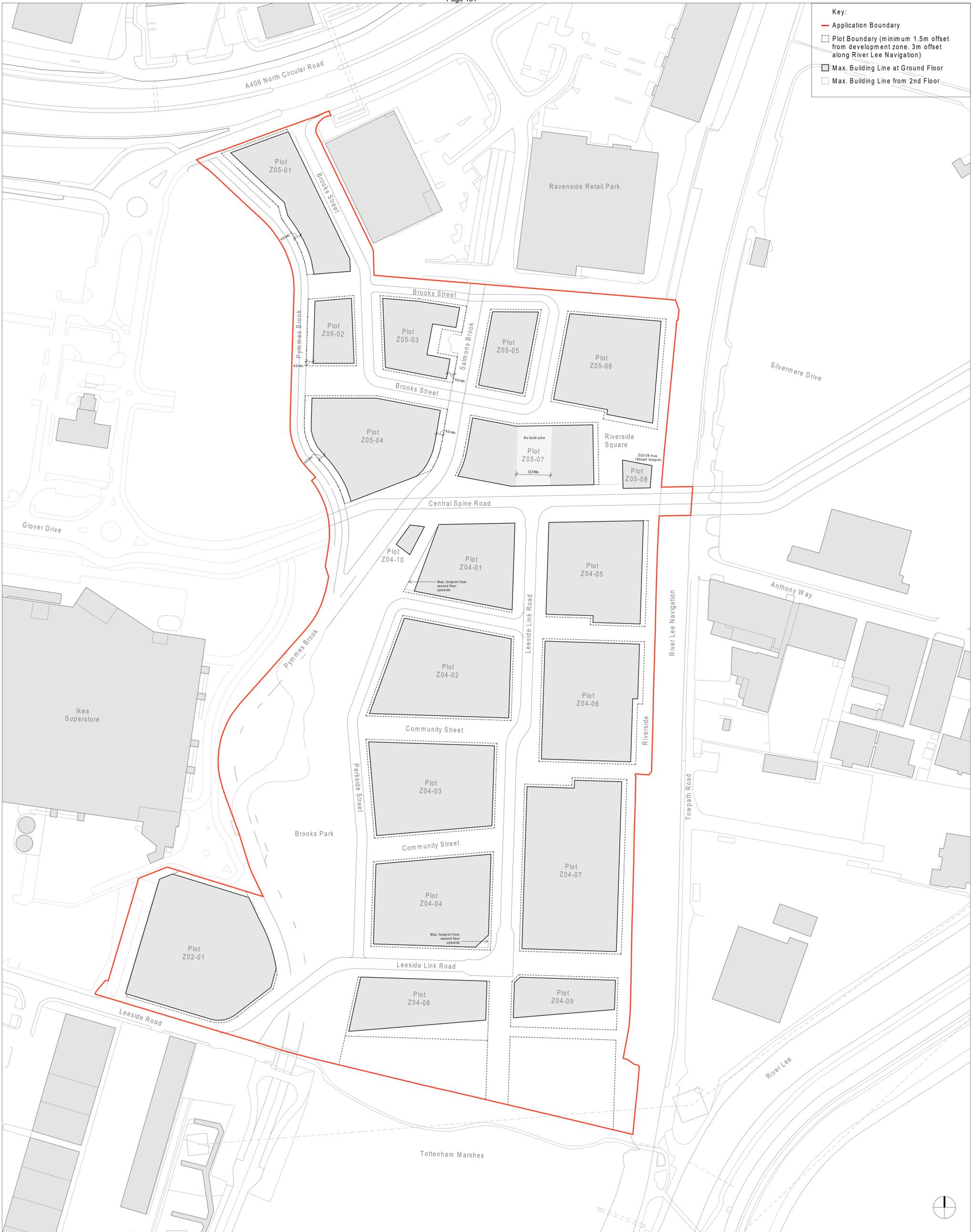
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- Key:**
- Application Boundary
  - Plot Boundary (minimum 1.5m offset from development zone, 3m offset along River Lee Navigation)
  - Max. Building Line at Ground Floor
  - Max. Building Line from 2nd Floor



London Borough of Enfield  
 Civic Centre  
 Silver Street  
 Enfield EN1 3XA



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**NOTES**  
 These drawings form part of a wider application and should be read in conjunction with other documents including the Access Statement and the Strategic Assessment with the 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