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# THE CABINET

## AGENDA

**Wednesday, 7th June, 2023 at 4.00 pm in the Conference Room,  
Civic Centre, Silver Street, Enfield, EN1 3XA**

### **Membership:**

Councillors : Nesil Caliskan (Leader of the Council), Ergin Erbil (Deputy Leader of the Council), Abdul Abdullahi (Cabinet Member for Children's Services), Chinelo Anyanwu (Cabinet Member for Public Spaces, Culture and Local Economy), Alev Cazimoglu (Cabinet Member for Health and Social Care), Susan Erbil (Cabinet Member for Licensing, Planning and Regulatory Services), Rick Jewell (Cabinet Member for Environment), Tim Leaver (Cabinet Member for Finance and Procurement), Gina Needs (Cabinet Member for Community Safety and Cohesion), George Savva MBE (Cabinet Member for Social Housing), Mustafa Cetinkaya (Associate Cabinet Member (Enfield South East)), Ayten Guzel (Associate Cabinet Member (Non-geographical)), Ahmet Hasan (Associate Cabinet Member (Enfield North)) and Chris James (Associate Cabinet Member (Enfield West))

### **Associate Cabinet Members (Invitees)**

Councillors : Mustafa Cetinkaya (Enfield South East), Ayten Guzel (Non-geographical), Ahmet Hasan (Enfield North) and Chris James (Enfield West)

### **Note: Conduct at Meetings of the Cabinet**

Members of the public and representatives of the press are entitled to attend meetings of the Cabinet and to remain and hear discussions on matters within Part 1 of the agenda which is the public part of the meeting. They are not however, entitled to participate in any discussions.

## PART 1

### 1. APOLOGIES FOR ABSENCE

### 2. DECLARATIONS OF INTEREST

Members of the Cabinet are invited to identify any disclosable pecuniary, other pecuniary or non pecuniary interests relevant to items on the agenda.

### 3. DEPUTATIONS

To note, that no requests for deputations have been received for presentation to this Cabinet meeting.

### 4. MINUTES (Pages 1 - 8)

To confirm the minutes of the previous Cabinet meeting held on 19 April 2023.

### 5. CLAVERINGS INDUSTRIAL ESTATE - STRATEGIC PROPERTY DISPOSAL

Report from the Executive Director – Housing, Regeneration & Development.  
**(Key decision – reference number 5624)**

**TO FOLLOW**

**(This item contains exempt information as defined in Paragraph 3 (information relating to the financial or business affairs of any particular person – including the authority holding that information) of Schedule 12A to the Local Government Act 1972, as amended).**

### 6. MERIDIAN WEST SUPPLEMENTARY PLANNING DOCUMENT (Pages 9 - 220)

A report from the Executive Director – Housing, Regeneration & Development is attached. **(Key decision – reference number 5600)**

### 7. HOMELESSNESS IN ENFIELD (5) - HOUSING RESIDENTS WHERE ACCOMMODATION IS AFFORDABLE (Pages 221 - 260)

A report from the Executive Director – Housing, Regeneration & Development is attached. **(Key decision – reference number 5625)**

### 8. DATE OF NEXT MEETING

To note that the next meeting of the Cabinet is scheduled to take place on Wednesday 13 September 2023 at 7.00pm.

### 9. EXCLUSION OF THE PRESS AND PUBLIC

To consider passing a resolution under Section 100(A) of the Local Government Act 1972 excluding the press and public from the meeting for the items of business listed on part 2 of the agenda on the grounds that they involve the likely disclosure of exempt information as defined in those paragraphs of Part 1 of Schedule 12A to the Act (as amended by the Local Government (Access to Information) (Variation) Order 2006). (Members are asked to refer to the part 2 agenda.)

## **AGENDA – PART 2**

### **10. LEISURE REVIEW (Pages 261 - 274)**

Report from the Interim Executive Director – Environment & Communities.  
**(Key decision – reference number 5609)**

**(This item contains exempt information as defined in Paragraph 3 (information relating to the financial or business affairs of any particular person – including the authority holding that information) of Schedule 12A to the Local Government Act 1972, as amended).**

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## CABINET - 19.4.2023

**MINUTES OF THE MEETING OF THE CABINET  
HELD ON WEDNESDAY, 19 APRIL 2023**

**COUNCILLORS**

**PRESENT** Nesil Caliskan (Leader of the Council), Abdul Abdullahi (Cabinet Member for Children's Services), Chinelo Anyanwu (Cabinet Member for Public Spaces, Culture and Local Economy), Alev Cazimoglu (Cabinet Member for Health and Social Care), Susan Erbil (Cabinet Member for Licensing, Planning and Regulatory Services), Tim Leaver (Cabinet Member for Finance and Procurement), Gina Needs (Cabinet Member for Community Safety and Cohesion), George Savva MBE (Cabinet Member for Social Housing), Ayten Guzel (Associate Cabinet Member (Non-geographical)), Ahmet Hasan (Associate Cabinet Member for Enfield North) and Chris James (Associate Cabinet Member (Enfield West))

**ABSENT** Ergin Erbil (Deputy Leader of the Council), Rick Jewell (Cabinet Member for Environment) and Mustafa Cetinkaya (Associate Cabinet Member for Enfield South East)

**OFFICERS:** Ian Davis (Chief Executive), Tony Theodoulou (Executive Director People), Fay Hammond (Executive Director Resources), Sarah Cary (Executive Director Place), Simon Pollock (Interim Executive Director of Environment and Communities), Neil Best (Head of Education, Strategic Resourcing and Partnerships), Ramasasi Ramasubramanian (Head of Access to Resources Integrated Services), Penny Halliday (Acting Director of Meridian Water), Joanne Drew (Director of Housing and Regeneration), Terry Osborne (Director of Law and Governance), and Jane Creer (Secretary)

**Also Attending:** Associate Cabinet Members (Invitees): Councillors Ayten Guzel (Non-geographical), Ahmet Hasan (Enfield North) and Chris James (Enfield West)  
Local press representative  
Members and officers observing

**1 APOLOGIES FOR ABSENCE**

Apologies for absence were received from Councillors Ergin Erbil, Rick Jewell and Mustafa Cetinkaya.

**2 DECLARATIONS OF INTEREST**

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There were no declarations of interest.

**3 DEPUTATIONS**

NOTED that no requests for deputations had been received for presentation to this Cabinet meeting.

**4 MINUTES**

**AGREED** that the minutes of the previous meeting of the Cabinet held on 8 February 2023 be confirmed as a correct record.

**5 SCHOOLS CAPITAL PROGRAMME STRATEGIC DELIVERY PLAN 2023/24 TO 2024/25**

Cllr Abdul Abdullahi (Cabinet Member for Children's Services) introduced the report of the Executive Director People, setting out the strategic plan for delivering works and services to deliver the Schools Capital Programme and outlining additional opportunities for further capital investment outside of capital grant income to deliver the strategic objectives.

It was confirmed that provision of more Special Educational Needs (SEN) pupil places within the borough was included in the objectives.

Members confirmed they had taken into account the exempt information set out in the Part 2 (Confidential) report also found on the agenda.

**DECISION:** The Cabinet agreed to:

I. Grant the approval to spend the 2023/24 and 2024/25 Capital Grant Budget of £24.75m and £10.23m respectively as set out in paragraph 44 of the report and for its inclusion in the Councils future Capital Programme.

II. Give approval to the strategic objectives as set out in the report and delegate authority to the Lead Member for Children's Services to agree a more detailed programme in May 2023 (Delivery Plan).

III. Give approval to commence the delivery of projects identified in the Delivery Plan to allow tenders to be pursued in compliance with the Council's Contract Procedure Rules.

IV. Delegate authority to the Lead Member for Children's Services to approve the procurement and award of works and services contracts for the specific SEN projects including professional and technical expenses as detailed in restricted appendix 'A' given their strategic importance for delivering SEN places to address increasing demand.

V. Delegate authority to Executive Director of People to:

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a. Approve the award of works contracts up to the value of £5 million for all condition related and decarbonisation projects to be included in the Delivery Plan.

b. Manage the Programme's individual project budgets within approved resources. Ongoing fluctuations in construction related materials and associated costs and variations between estimates and tender return costs require constant review. Our ability to expedite the approval process will reduce the time taken to award the works contracts within the limited tender acceptance periods.

c. Allocate a contingency provision (up to £350,000 including professional and technical fees) for urgent works and/or schemes identified as priority but not yet programmed.

VI. Delegate authority to Executive Director of Place or the Executive Director of People to accept any future funding rounds from the Public Sector Decarbonisation Scheme (PSDS) and to add this to the Schools Capital Programme.

VII. Note and authorise applications to the Department for Education (DfE) for Secretary of State consent in respect of any disposal or repurposing of the vacant caretakers / site managers properties.

VIII. Note Cabinet's previous approval (KD 5373) of the approach in relation to the disposal or repurposing of the vacant caretaker properties, allocating income generated to support the delivery of SEN provision as a strategic priority.

**The report sets out the options considered, if any, and the reasons for the recommendations and the decision.**

**(Key decision – reference number 5525)**

## **6 ENFIELD CHILDREN'S HOME PROJECT INVESTMENT**

Cllr Abdul Abdullahi (Cabinet Member for Children's Services) introduced the report of the Executive Director People, seeking approval for capital funding to include the appropriation of two properties currently in the Education portfolio to create two new children's homes for six residential placements.

The benefits of more local provision were highlighted.

Members were advised of the regulation and safeguarding that would be in place.

Members confirmed they had taken into account the exempt information set out in the Part 2 (Confidential) report also found on the agenda.

**DECISION:** The Cabinet agreed to:

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I. Note and authorise applications to the Department for Education (DfE) for Secretary of State consent to approve the release of two residential properties on the Carterhatch and Raglan school sites from the Education portfolio for the purpose of creating two residential, 3-bed children's homes.

II. Delegate authority to the Executive Director People to submit a planning application for change of use for both properties and subject to receiving necessary consent from the Secretary of State and budget approval, to attend to appropriation formalities for their change of use.

III. Approve the capital funding of up to £1.5m subject to approval of the new outline budget by Full Council in the next capital budget update, to include the appropriation of the properties and carry out all necessary improvements, extensions and refurbishments required to ensure that both homes are safe, secure, and fit for purpose.

IV. Delegate authority to the Executive Director People to approve individual project spend within the proposed £1.5m and to procure consultants and other resources, in accordance with Council Governance and Contract Procedure Rules as necessary to deliver the project.

V. Approve projected expenditure for the care services contracts.

VI. Delegate authority to the Executive Director People to approve procurement and subsequent award of care services contracts.

**The report sets out the options considered, if any, and the reasons for the recommendations and the decision.**

**(Key decision – reference number 5568)**

## **7 QUARTERLY CORPORATE PERFORMANCE REPORT (Q3)**

Cllr Nesil Caliskan (Leader of the Council) introduced the report of the Chief Executive providing the quarterly overview of performance in delivering on the Council priorities.

In response to Members' concerns regarding leisure centre attendance and poor performance of Fusion, it was confirmed the leisure provider was being held to account, an action plan had been drawn up, and issues were being addressed by officers.

In response to Members' queries in respect of homelessness and housing pressures, it was confirmed that privately rented accommodation was in short supply and the Council was assisting with schemes to help with relocation, finding accommodation, and mediation with landlords. Councils were also collectively lobbying government for increased grant.



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**DECISION:** The Cabinet agreed to note the progress being made against the key priority indicators for Enfield.

**The report sets out the options considered, if any, and the reasons for the recommendation and the decision.**

**(Non Key)**

**8 MERIDIAN WATER FINANCIAL MODEL**

Cllr Nesil Caliskan (Leader of the Council) introduced the report of the Executive Director Place, providing an update on the progress of Meridian Water and seeking approval of the revised financial model and approval of delegations to proceed with marketing four parcels this year.

Cllr Caliskan commented that this was an exciting stage of the project, with a move from planning to homes being built and a lot happening on site, including creation of jobs in construction and the meanwhile activities. The choice had been made to continue with the momentum of the project and the improvement of the area, while getting value for money. Members were reassured that the aims and objectives of the project remained as proposed, and that local people were to be the principal beneficiaries. The Executive Director Resources confirmed that the financial model had been reviewed and had responded to the economic situation.

Members confirmed they had taken into account the exempt information set out in the Part 2 (Confidential) report also found on the agenda.

**DECISION:** The Cabinet agreed to:

- I. Note the scheme progress to date, the concluding activities for Stage One of Meridian Water, and the actions taken by the Council to manage expenditure over the past year.
- II. Approve the 2023 financial model as the primary financial viability tool for the Meridian Water project.
- III. Note the allocation of historical costs in the model and to note the key assumptions and outputs that are included in the financial model baseline.
- IV. Note the financial metrics are a point in time.
- V. Delegate to the Director of Development (Meridian Water) to appoint advisors to work up a detailed delivery strategy for Meridian Four (M4), Teardrop (M13) and Meridian Seven (M7) to optimise the financial position of each parcel.
- VI. Delegate to the Portfolio Holder for Meridian Water approval to commence the marketing and procurement of the M13, M4 and M7 to seek development

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partners following detailed due diligence and soft market testing. The Portfolio holder report will contain development, financial and placemaking hurdles.

VII. Agree a flexible marketing approach to the use, tenure, selected development partner and parcel packaging of Meridian Three.

VIII. Approve the two-year capital expenditure budget as set out in Appendix 1 of the report, subject to approval of the new outline budget by Full Council in the next capital budget update.

IX. Note the budget includes £4.4m for land purchase which will require further approval to spend.

X. Delegate to the Executive Director of Place and Director of Finance Capital and Commercial approval of the £4.4m land purchase.

XI. Note that, as a prudent measure, the Council will seek to increase its voluntary annual provision to repay Meridian Water debt from General Fund revenue (see para 143-145 of the report).

XII. Note officers will bring a stage two development strategy report to Cabinet in Autumn 2023.

**The report sets out the options considered, if any, and the reasons for the recommendations and the decision.**

**(Key decision – reference number 5463)**

## **9 FUTURE OF SHROPSHIRE AND CHESHIRE HOUSE**

Cllr George Savva (Cabinet Member for Social Housing) introduced the report of the Executive Director Place, setting out the preferred option on the future of Cheshire and Shropshire Houses.

The report detailed how the Council would work to secure moves to suitable accommodation for the residents of both blocks without delay, and also set out longer term options on the blocks. The options appraisal for the site would also be undertaken in consultation with neighbouring residents.

It was confirmed that the residents wanted to move, that value for money was firmly borne in mind, and that giving certainty to residents about rehousing was important.

The Cabinet Member for Social Housing, ward councillors, and the Director of Housing and Regeneration and team of officers were thanked for their hard work at a difficult time and for the intensive engagement and consultation with the residents.

**DECISION:** The Cabinet agreed to:

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I. In the light of resident engagement and the options appraisal, agree to the decommissioning of Shropshire and Cheshire Houses, subject to the safe rehousing of all residents.

II. Agree the expenditure outlined in the report to enable full decant of the Shropshire and Cheshire blocks and **recommend to Council** approval of the budget for the acquisition of leaseholder interests.

III. Approve the proposed Residents Offer set out in the report and shown in Appendix A of the report.

IV. Note the investment required for the safe maintenance and repair of the buildings whilst residents remain in situ which will be funded from the approved capital programme.

V. Agree to delegate the development options for the future of the blocks and estate and to consult all residents on the estate (inc under S105), to the Director of Housing and Regeneration in consultation with the Cabinet Member for Social Housing and the Leader.

VI. Agree to Secure tenants being awarded decant status enabling them to bid for alternative homes through the Choice Based Lettings system.

VII. Agree to issue an 'Initial Demolition Notice' to prevent any future Right to Buy requests dealing with all related steps and documentation including any steps needed to obtain vacant possession.

VIII. Agree to use CPO powers in principle across the two blocks with CPOs for the blocks to be brought back to Cabinet at a later date with supporting justification.

IX. Authorise officers to carry out all preparatory work for the proposed CPO and any other powers (such as G10).

X. Note the results of the resident consultation to understand accommodation needs and lifestyle considerations which will be factored into the re-housing programme and support for residents affected.

**The report sets out the options considered, if any, and the reasons for the recommendations and the decision.**

**(Key decision – reference number 5602)**

**10 DATE OF NEXT MEETING**

NOTED this was the last meeting of the Cabinet in the 2022/23 municipal year. The dates of the future meetings would be confirmed following Annual Council on Wednesday 10 May 2023.

**11 EXCLUSION OF THE PRESS AND PUBLIC**

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A resolution was passed under Section 100(A) of the Local Government Act 1972 excluding the press and public from the meeting for the items of business listed on part 2 of the agenda on the grounds that they involve the likely disclosure of exempt information as defined in those paragraphs of Part 1 of Schedule 12A to the Act (as amended by the Local Government (Access to Information) (Variation) Order 2006).

Members were asked to refer to the part 2 agenda but there were no other questions or comments.

The meeting ended at 7.48 pm.



## London Borough of Enfield

<b>Title:</b>	Meridian West Supplementary Planning Document (SPD)
<b>Report to:</b>	Cabinet
<b>Date of Report briefing:</b>	Leader's briefing 19 <sup>th</sup> April 2023
<b>Cabinet Member:</b>	Cabinet decision
<b>Directors:</b>	Brett Leahy, Director of Planning and Growth Sarah Cary, Executive Director of Place
<b>Report Author:</b>	Edward Jones <a href="mailto:edward.jones@enfield.gov.uk">edward.jones@enfield.gov.uk</a>
<b>Ward(s) affected:</b>	Upper Edmonton
<b>Key Decision Number</b>	KD5600
<b>Implementation date, if not called in:</b>	19 <sup>th</sup> June 2023
<b>Classification:</b>	Part I Public
<b>Reason for exemption</b>	

## Purpose of Report

1. This report recommends Cabinet to approve the Meridian West Bank Supplementary Planning Document (MW SPD) for adoption in accordance with Regulation 14 of the Town & Country Planning (Local Planning) (England) Regulations 2012 as amended. The MW SPD will help to coordinate development across the Meridian West area, providing more detail to supplement the policies and proposals contained in the development plan. Once adopted, MW SPD will be a material consideration in the determination of planning applications.

## Recommendations

- |  |
|--|
| <ol style="list-style-type: none"><li>I. Cabinet is recommended to approve the Meridian West Supplementary Planning Document for adoption set out in Appendix 1.</li></ol> |
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## Background and Options

2. A Supplementary Planning Document (SPD) is needed for Meridian West to ensure coordinated development, including the identification of infrastructure contributions to avoid poor quality fragmented development, facilitate the delivery of a comprehensively planned area and provide greater guidance and to facilitate high quality design, infrastructure provision and placemaking to secure maximum benefits for the wider community. The production of the MW SPD was envisaged by both the Core Strategy and Edmonton Leaside Area Action Plan (ELAAP).
3. SPDs are used as a material consideration in determining planning applications; however, they are not part of the Development Plan, but are linked to a specific policy in the Local Plan. The National Planning Policy Framework 2021 (NPPF) requires SPDs to only provide further detail to Local Plan policies to help applicants make successful applications or aid infrastructure delivery.
4. The MW SPD area is surrounded by land uses which present compatibility challenges with high density new homes. There are 19 safeguarded waste management sites in the vicinity, as well as three priority search areas for new waste management facilities, which have been designated as part of the recently adopted North London Waste Plan (NLWP 2022). Strategic Industrial Land lies to the north, south (in LB Haringey) and further east (in LB Waltham Forest). In order to realise ELAAP's ambition that industrial estates can continue to thrive, further guidance is required to manage interfaces and proactively overcome 'bad neighbour' conflicts.
5. The vicinity of the site is rich in natural assets – Salmons and Pymmes Brooks, the Lee Navigation and the Lee Valley Regional Park are close by. Providing further planning guidance will help development make the most of these assets, enhancing their biodiversity and recreation value and helping to link Edmonton to the Lee Valley Regional Park.
6. By providing further guidance on the creation of a new local centre at Meridian West, the MW SPD will ensure the creation of a multifunctional hub,

where existing and future residents can exploit future job opportunities in a range of economic sectors, helping to deliver on the ambitions set out in ELAAP.

7. As such, further planning guidance is required to manage this growth to ensure the provision of affordable housing and infrastructure is planned for and delivered to support existing and future residents while creating a liveable and vibrant place.
8. The role of the MW SPD is to optimise the delivery of new development and secure community benefits for the borough by:
  - Ensuring good quality placemaking, helping to deliver new homes and workspaces;
  - Managing interfaces to ensure that all land uses in the area can thrive;
  - Coordinating the provision of new public open spaces and improved links to the area's natural context;
  - Identifying, planning and delivering social and physical infrastructure including public transport, schools and health facilities; and
  - Coordinating planning contributions.
9. A draft Screening Report was produced in August 2021 to determine if significant environmental effects would be likely. The report concluded with the Council's preliminary view that the draft MW SPD would be unlikely to give rise to significant environmental effects. The Council consulted with the relevant bodies (namely the Environment Agency, Historic England and Natural England) on the preliminary screening assessment outcome. No responses were received contrary to this view.
10. On the basis of responses received, the Council has confirmed its view that the MW SPD is unlikely to give rise to significant environmental effects, and a Strategic Environmental Assessment is therefore not considered necessary. A formal statement of determination and a final screening report is attached as Appendix B.
11. The content of the MW SPD has been developed to supplement the current planning policies in place. It provides clear and concise guidance to aid the delivery of new development and capture community benefits. It consists of the following guiding sections:
  - 1.0 Introduction
  - 2.0 Context
  - 3.0 Vision
  - 4.0 Guiding principles
  - 5.0 Infrastructure delivery
12. SPDs undergo a much simpler preparation process than Development Plan Documents and are not subject to scrutiny by an independent inspector.

However, they are subject to statutory preparation procedures in accordance with Regulations 11-14 of the Town and Country Planning (Local Planning) (England) Regulations (2012) and statutory public consultation must be undertaken in accordance with the [Council's Statement of Community Involvement \(SCI\)](#).

13. At its meeting on 12 October 2022, Cabinet approved the draft MW SPD for public consultation for a period of six weeks, exceeding the statutory minimum of four weeks. The public consultation commenced on 9<sup>th</sup> November 2022 and ran until 14<sup>th</sup> December 2022.

14. A total of 20 representations were received from a range of 19 organisations and one individual. Responses have been collated and a full account of the consultation is provided in the Consultation Statement (see Appendix C).

15. In summary, the main changes made to the MW SPD following the above consultation are as follows:

- Further material on the mitigation of transport impacts (in response to LB Haringey comments).
- Refinement of blue-green infrastructure section (in response to comments from several statutory stakeholders).
- Removal of the tall buildings definition, clarification that the guiding principle interprets existing policy, and added policy references in relation to proposed tall building locations (in response to GLA comments).

16. The full range of changes made to the MW SPD in response to representations received are set out in full in the Consultation Statement (Appendix C).

17. Consideration was given to the following options:

**Table 1: Options considered**

Options	Comments
<p>Option A: Adopt the draft MW SPD in June 2023.</p> <p><b>This is the recommended option</b></p>	<p>Policy EL6 of ELAAP and paragraph 9.17 of the Core Strategy indicates that an SPD will be produced.</p> <p>The SPD provides the opportunity to ensure that development in the area comes forward in a strategic and comprehensive manner. It will set design principles to ensure coordinated and high-quality development across the Meridian West, outline other requirements and principles for development and set out the infrastructure requirements for development of the area and how they can be delivered in a timely manner.</p>
<p>To not adopt the draft MW</p>	<p>This approach would result in an</p>



Options	Comments
<p>SPD.</p> <p>This is not a recommended option</p>	<p>uncoordinated approach to development across the area. It is likely to result in a lack of coordination of key infrastructure provision with the risk that not all infrastructure is provided, or it is not provided for in a timely manner. It also risks the lack of joined up thinking in relation to key design principles across the area.</p>
<p>To delay the adoption of the SPD.</p> <p>This is not a recommended option.</p>	<p>This option was not pursued as it would not help the council address the pressing housing crisis or adequately deal with the risk of piecemeal poor-quality planning applications. The Government have also advised Local Planning authorities (through a <a href="#">Chief Planner's letter</a>) not to delay and to carry on with plan-making despite wider uncertainties raised by potential changes to the planning system.</p>

### Preferred Option and Reasons for Preferred Option

18. Adoption of the MW SPD will enable the Council to set a clear direction of travel, indicating the Council's ambitions for the type and quality of development it expects in the Meridian West area and how it expects the interfaces between various land uses to be managed. The MW SPD adds detailed specific guidance to the policy framework for Meridian West and will help ensure development:

- Aligns with the principles of positive placemaking;
- Reduces the risk associated with uncoordinated speculative ad-hoc planning applications;
- Is properly integrated with its surroundings, minimising the risk of 'bad neighbour' impacts;
- Plans for and delivers infrastructure to support existing and future residents; and
- Creates a liveable and vibrant place.

### Relevance to Council Plans and Strategies

19. The MW SPD will contribute to the delivery of the following Enfield Council Plan 2023-26 priorities:

- **'Clean and green places'**

Provide the guidance for improved blue-green connections, effectively knitting in MW to surrounding habitats through the provision of new and restored blue-green spaces, delivering an uplift in biodiversity. Support

active and low-carbon travel through the provision of walkable streets, better bus and train connectivity and facilities and services close to home. Encourage the sustainable use of materials and responsible construction management.

- **‘More and better homes’**

Provide the guidance to help create a sustainable extension of Edmonton, delivering thousands of new homes to the high standards set by the adopted development plan. Ensure new homes are set within a high-quality public realm and well-integrated into a sustainable mixed-use community.

- **‘Strong, healthy and safe communities’**

Provide the guidance to plan for and help secure new schools, health facilities, street greening, sport, leisure, recreational and cultural facilities close to where people live, including new parks and open spaces and better access to the Lee Valley Regional Park.

- **‘Thriving children and young people’**

Provide the guidance to plan for increased education, leisure and play provision, including new schools, nurseries, a community hub, and sports and leisure facilities. Support the provision of a multi-use youth facility and multifunctional parks and green spaces designed to accommodate play areas and provide opportunities for informal recreation.

- **‘An economy that work for everyone’**

Provide the guidance to support a diverse mix of employment opportunities, through transforming a former industrial area, delivering a range of workspaces to attract jobs and investment. The SPD provides the guidance for a new local centre that will serve as a multifunctional community hub, offering shops, places to eat and drink, and community facilities.

## **Financial Implications**

20. There are no direct financial implications arising from this report. The MW SPD will be published electronically on the Council’s website and only limited hard copies will be produced.

## **Legal Implications**

21. Pursuant to Section 19(2) of the Planning and Compulsory Purchase Act 2004, when preparing an SPD, the Council must have regard to:

- National policies and advice contained in guidance issued by the Secretary of State;

- The spatial development strategy if the authority is a London borough;
  - Any other local development document which has been adopted by the authority;
  - The resources likely to be available for implementing the proposals in the document; and
  - Other matters as the Secretary of State prescribes.
22. Furthermore, the Council must comply with their Statement of Community Involvement which sets out how the local planning authority will consult and engage with individuals, communities and other stakeholders as set out in section 19(3) of the Planning and Compulsory Purchase Act 2004.
23. The MW SPD does not form part of the statutory development plan but will be an important material consideration in the making of the planning decisions.
24. There is a statutory process for preparing an SPD and the requirement is set out in Regulations 11 to 16 of the [Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#) for the production and adoption of planning documents.
25. The Environmental Assessment of Plans and Programmes Regulations 2004 and the Conservation of Habitats and Species Regulations 2017 also require the Council to consider whether or not a Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA) of the SPD should be undertaken. Following consultation with the Environment Agency, Historic England and Natural England it has been concluded that neither a SEA or HRA will be required.
26. It is considered that the above-mentioned legislation has been complied with and there are no direct legal implications as a result of this report.

### **Equalities Implications**

27. The Equality Act 2010 places a statutory duty on the Council to ensure that when considering any new or reviewed strategy, policy, plan, project, service or procedure the impacts on particular groups have been considered. A full Equalities Impact Assessment (EqIA) has been completed and is available in Appendix D. It identifies a general positive impact (in terms of facilitating the delivery of new homes, workspaces, community facilities, green spaces, and safe active streets) which will help address issues of homelessness, unemployment, poor health, exposure to pollution and safety, which disproportionately affect some groups more than others. No negative impacts from an equality perspective were identified for any of the protected groups.
28. The MW SPD provides guidance for building typologies and public spaces that seek to deliver clear, legible and active open spaces and movement routes to create safe environments. New developments will also have to satisfy the relevant policies in the Council's Local Plan relating to 'Secured by Design' principles. Development will be required to ensure crime prevention

measures are considered to assist with reducing the opportunity for crime and the fear of crime, by creating a safer and more secure environment.

### **Environmental and Climate Change Implications**

29. The allocation of major development in the Meridian West area of Meridian Water has been the subject of a full sustainability appraisal process as part of the preparation of the ELAAP and the allocation of Meridian Water as a development site was found to be 'sound' by an independent planning inspector, having regard to the sustainability appraisal.
30. As mentioned in paragraphs 19 and 20 of this report, it is necessary under the Environmental Assessment of Plans and Programmes Regulations 2004 and the Conservation of Habitats and Species Regulations 2017 to assess the need to undertake a Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA). An SPD screening report was prepared to identify if a SEA and HRA would be required. The responses from the statutory consultees are set out in the final screening report. Based on our assessment and the comments from national statutory bodies, the Council will not be required to undertake a full SEA or HRA.
31. The SPD provides the guidance to support opportunities on how more sustainable development of the area can be brought forward:
- Securing biodiversity net gain;
  - Delivery of a green infrastructure network i.e. the green network;
  - New tree planting;
  - Delivering new public open spaces and amenity spaces;
  - Setting out requirements for more sustainable forms of building and public realm areas, helping to address the climate emergency and mitigate impacts of a changing climate;
  - Provision of new and enhanced walking, cycling and public transport links to provide good alternatives to car travel; and
  - Provision of schools and local facilities on site to reduce the need for new residents to travel and enhance their ability to reach those facilities by non-car modes.
32. Any development within the SPD area would also be required to meet the sustainability standards set out in the adopted development plan (comprising the London Plan 2021, Core Strategy 2010, and Development Management Document 2014).

### **Public Health Implications**

33. The built and natural environments are major determinants of health and wellbeing of the population, and development within Meridian West will

provide opportunities for a healthy living environment which will promote and enable healthy behaviours.

34. Secure housing is a basic human need and is essential to maintaining and improving health. Enfield's Joint Health and Wellbeing Strategy both references and links to the Council's Housing and Growth Strategy accordingly. Increasing capacity within the housing sector in Enfield will therefore further help to meet housing needs.
35. Promoting active travel (walking and cycling) with new healthy streets and parks can be a very effective means of integrating physical activity into everyday life. Other benefits to individuals could include greater access to employment, education, shops, services, recreation, health facilities and the countryside.
36. Currently, 4.3% of Enfield adults cycle once a month and 40.5% walk once a month as a means of transport. Best practice for cycling is 46.9% and 65.7% for walking. Therefore, any means of directly supporting the take up of walking or cycling is to be encouraged.
37. The MW SPD should have a positive impact on general health and well-being in terms of improving the environment and promoting health and wellbeing by facilitating better housing, employment and increased physical activity. However, implementation of the MW SPD will need to be monitored to ensure that there are no significant negative health impacts such as from noise/dust pollution during demolition and construction works.
38. In addition, it is noted that many Enfield residents live in close proximity to the North Circular Road (A406) meaning that this noise/air pollution is likely to be an ongoing issue that needs to be addressed to ensure good health. Particular attention to good ventilation as well as acoustic insulation is paramount.

### **Other Implications**

39. The MW SPD will enable the Council to ensure that housing delivery is optimised and that securing the benefits for the wider community is maximised. The development of Meridian West will release further financial contributions from forthcoming development sites, which in turn will deliver new affordable housing, local enterprise and employment opportunities, public realm enhancements, and community infrastructure.

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### **Appendices**

- A. Meridian West SPD
- B. Final SA/ SEA Screening Statement

- C. Consultation statement
- D. EqlA

**Background Papers**

- Edmonton Leaside AAP (2020)
- Sustainability Appraisal to accompany Edmonton Leaside AAP

**#Departmental reference number: HRD2324\_003**

# Meridian West

## Supplementary Planning Document



**June 2023**  
**Housing, Regeneration and Development**  
[www.enfield.gov.uk](http://www.enfield.gov.uk)

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# Foreword from the Leader of the Council

**This supplementary guidance provides a framework for positive placemaking in Meridian West, the heart of Meridian Water. Meridian Water is one of the UK's largest regeneration opportunities, and the Council as master developer has already levered in significant funding to facilitate redevelopment, reducing the risk for private sector partners, and setting the stage for a step-change in investment in the south east of the borough.**

So far, the project has already delivered the first new train station in London for a decade, Troubadour film studios, Bloqs and a skills academy. It has created more than 700 jobs and has provided over £300,000 for local community projects. The first homes are expected to be handed over this summer.

This document will enable the ambitions of the Edmonton Leaside AAP to be delivered on the ground. The following guidance will

enable the construction of good homes, including family and affordable housing, in an increasingly well-connected neighbourhood. Existing and new residents will have better access to the Lee Valley Regional Park and green and blue spaces, enabling them to live lives enriched by nature. New development will deliver jobs and services which will benefit Enfield residents in Edmonton and beyond, supporting an economy that works for everyone. By providing the ingredients for safe, healthy and confident communities, the guidance in this SPD provides a solid foundation for positive placemaking at Meridian Water for years to come.

The guidance in this document applies equally to the Council and other landowners' proposals. We look forward to working with developers to attract jobs and investment and deliver growth that will benefit Enfield residents.

Cllr Nesil Caliskan, Leader of the Council



# Introduction



Image 2: Aerial view of Meridian West and wider site

# 1.0 Introduction

## Purpose and scope of the document

- 1.1 This Supplementary Planning Document (SPD) relates to Meridian West, the western extent of the Meridian Water regeneration area. The SPD area is shown in Figure 1.1.
- 1.2 The purpose of this SPD is to provide more detailed planning guidance to local, sub-regional and London Plan policies to ensure high quality placemaking and co-ordinated sustainable development in Meridian West.
- 1.3 ELAAP supports mixed use redevelopment to provide a substantial uplift in homes and jobs in the entire Meridian Water area, supported by infrastructure improvements. This SPD provides guidance on how the Edmonton Leaside Area Action Plan (ELAAP) will be implemented spatially.

## Status

- 1.4 This SPD has been prepared to ensure the vision for high quality development as set out in ELAAP is achieved in Meridian West. It is not a development plan document and does not introduce new planning policies; instead, the guidance 'hangs off' the existing development plan, including ELAAP. It does not repeat higher level policies but in some instances may refer to them. It is a material consideration in decision making and will inform development proposals in Meridian West (MW).
- 1.5 The MW SPD is a material consideration which helps determine planning applications within the designated area. This means that in addition to satisfying the requirements of national, regional and local planning policies, development proposals will also need to demonstrate how the guidance in this SPD has been considered. The SPD supplements and provides detailed guidance on the policies and recommendations of the Core Strategy, Edmonton Leaside Area Action Plan, London Plan and North London Waste Plan. Once adopted, its guidance will be applied to the Meridian West area and will be relevant to all development applications within this designated area.

1.6 It is recognised that the principles set out in this guidance may not be applicable in all situations. It is also recognised that innovative, high quality design solutions may come forward that do not fully comply with the requirements of the SPD. In order to provide for a flexible approach in applying this guidance, where applications depart from the SPD's principles, the Council will look to applicants for robust justification for this departure. This justification will be taken into account as a consideration when considering the design and other merits of such proposals.

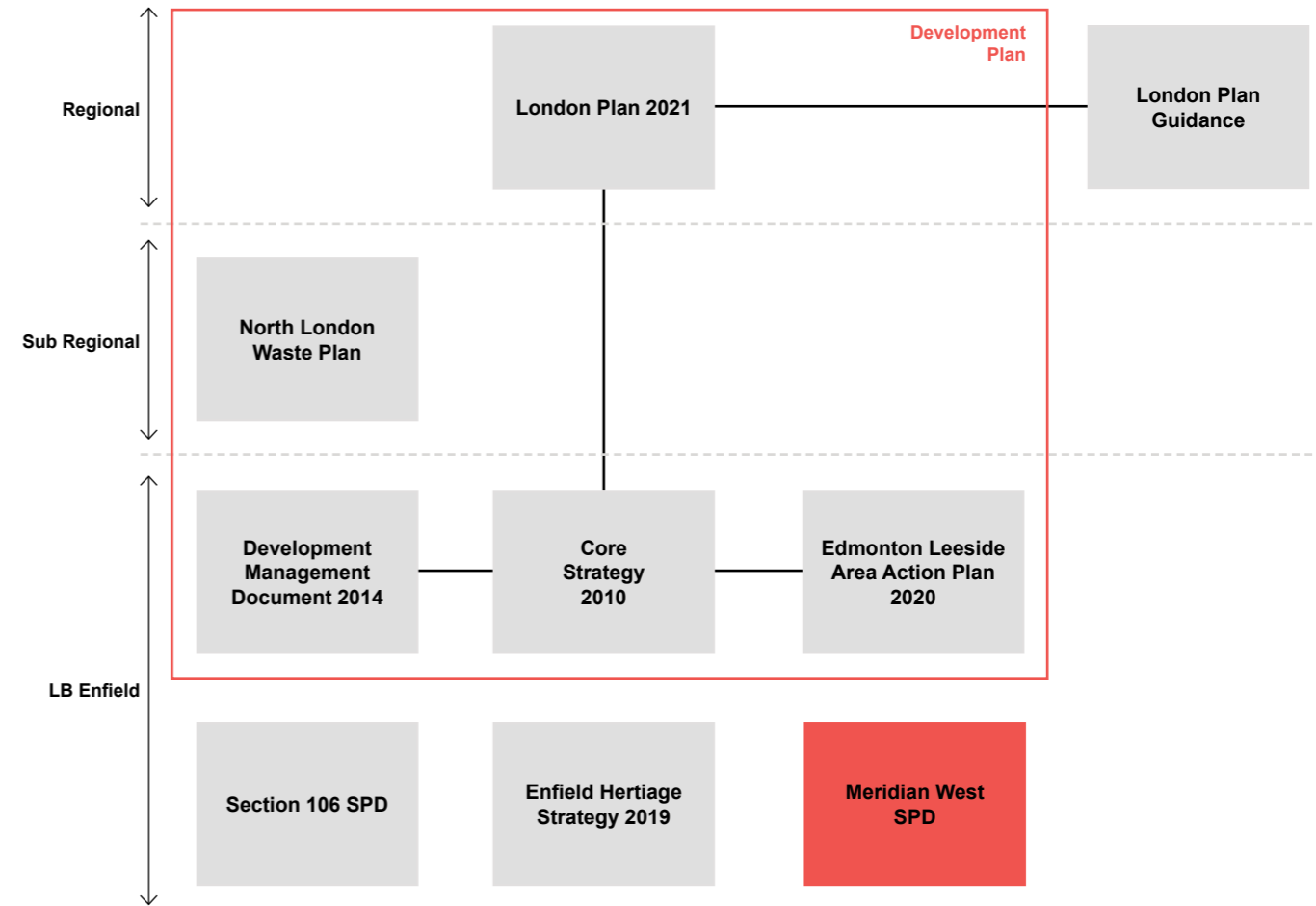


Diagram: Relationship to current and emerging planning structure



Diagram: Relevant development plan documents

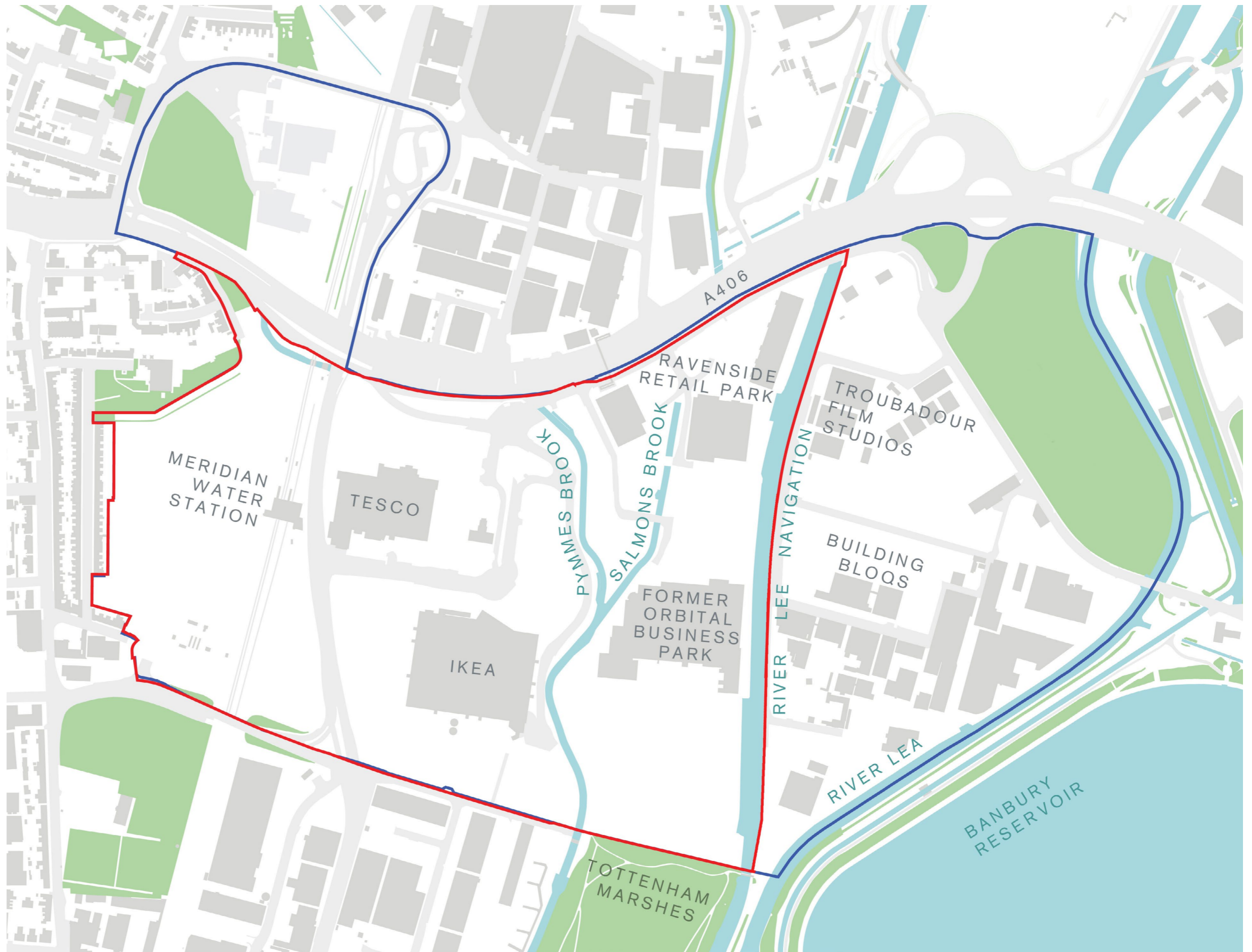


Figure 1.1: Map showing the Meridian West area (in red) within the context of the wider Meridian Water regeneration area (in blue)

**Relevant planning policy**

- 1.7 The MW SPD provides further guidance to LB Enfield's adopted development plan. At present, this consists of the London Plan (LP), Enfield Core Strategy (CS), Enfield Development Management Document (DMD), Edmonton Leaside Area Action Plan (ELAAP) and the North London Waste Plan (NLWP).
- 1.8 The Upper Lee Valley Opportunity Area Planning Framework (ULVOAPF) was adopted by the Mayor of London in July 2013. The framework provides indicative estimates of employment capacity (15,000) and minimum guidelines for new homes to 2031 (20,100).
- 1.9 Enfield's Core Strategy (2010) identifies Meridian Water as a Place Shaping Priority Area within the Central Leaside Strategic Growth Area. Core Policy 1 states that improvements in the social and physical infrastructure will be prioritised in the strategic growth areas, and that area actions plans will be provided for each to provide the context for more detailed masterplans. Core Policy 37 Central Leaside (now Edmonton Leaside) sets the overall objectives for the plan area focussing on the potential to deliver a new sustainable urban mixed-use community at Meridian Water, while Core Policy 38 focuses on the delivery of regeneration at Meridian Water.
- 1.10 Enfield's Development Management Document (2014) provides detailed criteria and standard based policies by which planning applications will be determined (alongside the other development plan documents) and is a key vehicle in delivering the vision and objectives for Enfield as set out in the Core Strategy.
- 1.11 Edmonton Leaside Area Action Plan (2020) articulates in greater detail how the Local Plan policies will be implemented and provides a detailed policy framework to guide new development up to 2032, supporting the delivery of around 5,000 homes and 1,500 new jobs. ELAAP contains area specific policies for the entire Meridian Water Regeneration Area and this SPD has been produced to provide more detailed guidance for the Meridian West area based on these local policies.

- 1.12 ELAAP confirms the vision for Meridian Water to become a sustainable urban neighbourhood, including a new town centre and associated community infrastructure and public open space, to help meet existing and future housing needs and support the diversification of the local economy. Improving transport connections (particularly rail, bus and cycling) and improvements to blue and green infrastructure are also strategic priorities across Edmonton Leaside.
- 1.13 ELAAP sets a planning framework for the coordinated development of Edmonton Leaside as a whole, seeking to reduce flood risk, improve access to the Lee Valley Regional Park, enhance the blue-green network, and improve the quality and capacity of industrial estates. See Figure 1.2 below which sets out policy designations for the ELAAP area.
- 1.14 Adopted in 2022, the North London Waste Plan (NLWP) safeguards a number of waste sites in the south east of Enfield. Whilst no waste sites are located within MWWB, there are approximately 19 safeguarded waste sites in the vicinity. In addition to safeguarding existing waste sites, the NLWP designates three Priority Areas for New Waste Management Facilities in the vicinity of the SPD area. See the highlighted green zones in Figure 1.3 below.
- 1.15 Enfield is in the process of preparing a new Enfield Local Plan to cover the period between 2019 and 2039. Consultation on an early Issues and Options (Regulation 18) was undertaken between December 2018 and February 2019. Further consultation on a Draft Plan (Regulation 18) was undertaken between June and September 2021. Future stages of Local Plan development are set out in the Council's [Local Development Scheme](#). Whilst this guidance flows from the policy framework set by the adopted development plan (including the Core Strategy and ELAAP) the development of the draft Local Plan offers an opportunity to update the overarching policy framework for Meridian Water. Going forward, the draft Local Plan will supersede the Core Strategy and Development Management Document and will provide updated aspirations for the future of Meridian Water and its strategically important sites.

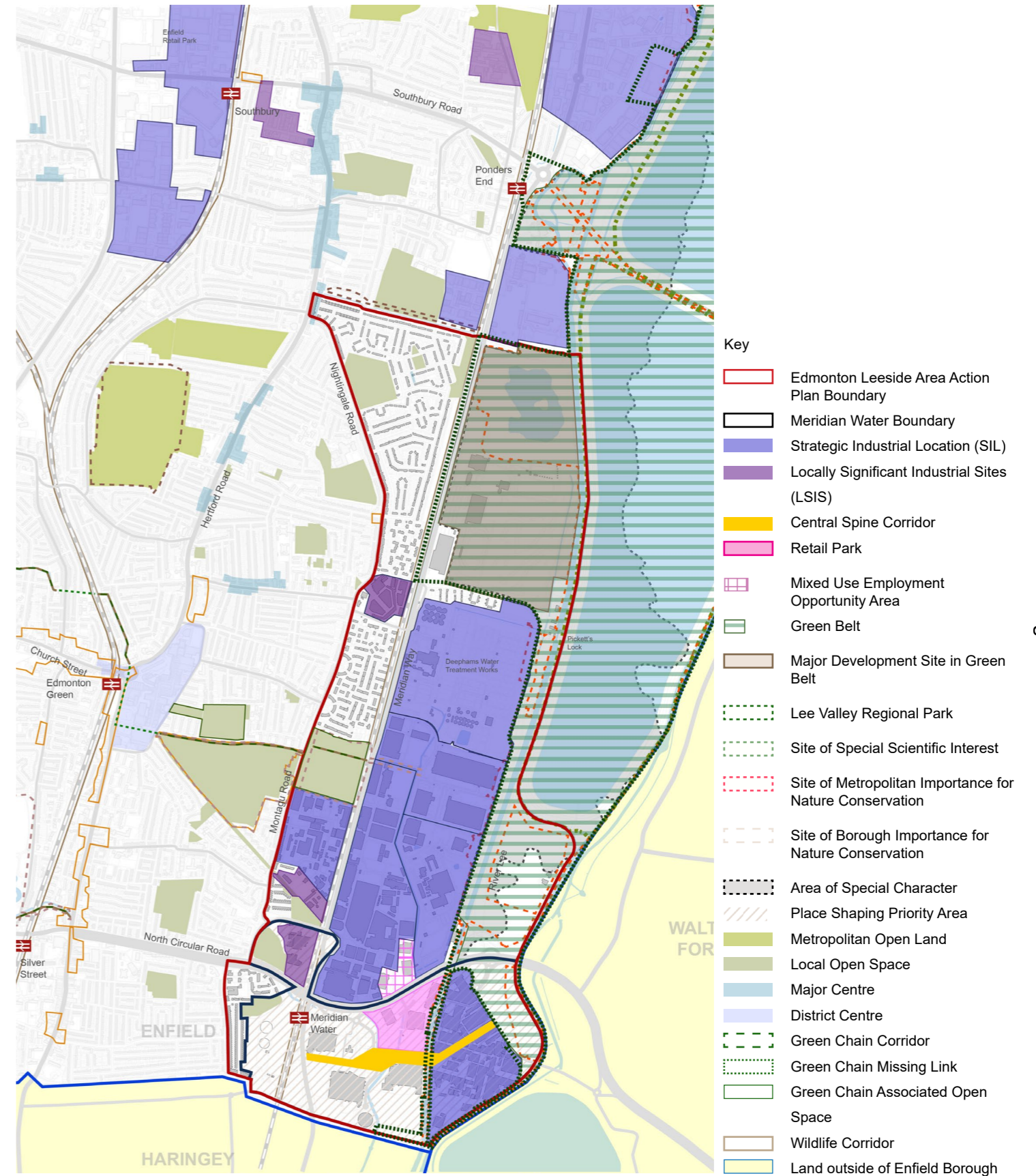


Figure 1.2: Edmonton Leaside Area Action Plan - Policies Map (2020)

1.16 The 2021 Regulation 18 draft Local Plan established Meridian Water as a placemaking area, where comprehensive, residential-led mixed-use development that optimises the site's potential can be delivered. As the draft Local Plan is at a relatively early stage of preparation it, at the time of writing, has little to no weight in decision making, though the weight afforded to the draft Enfield Local Plan will increase as it progresses towards adoption.

**Stakeholder Engagement and statutory consultation**

1.17 Engagement by the Council as Local Planning Authority has been undertaken with a number of key stakeholders to seek initial views on the SPD to shape content ahead of formal consultation under Regulation 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012. These stakeholders have included:

- Environment Agency;
- Greater London Authority;
- Transport for London;
- Adjoining local authorities (London Boroughs of Haringey and Waltham Forest);
- Canal and River Trust;
- Thames Water;
- Lee Valley Regional Park; and
- Natural England.

1.18 Pre-engagement consultation sessions encompassed a presentation on the key principles, scope and ambitions of the MW SPD, and a discussion on the strategic and cross-cutting issues and opportunities brought by the MW SPD.

1.19 The Council as landowner and development promoter has also engaged with the three main current landowners of privately-owned sites, IKEA, Tesco, and Prologis (owners of Ravenside Retail Park).

**SA/SEA and HRA screening process**

1.20 The Council undertook a screening assessment in August 2021 under Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations 2004 on whether or not a Strategic Environmental Assessment (SEA) was required for this SPD. The Council concluded from this assessment that an environmental assessment was not required.

1.21 A formal statement of determination and a final screening report has been issued and can be viewed on the Council's website [here](#).

1.22 Consideration was also given to the Habitats Regulations Assessments (HRA) to determine whether an Appropriate Assessment (AA) was required. It was concluded that as the SPD does not introduce new planning policy, the SPD, alone or in combination with other plans and programmes, is not likely to have a significant effect on any European site. As such it was considered that an Appropriate Assessment of the SPD was not required.

**Evidence Base**

1.23 As a Supplementary Planning Document, the guidance contained within this document flows from the existing development plan. The evidence base for the Edmonton Leaside Area Action Plan, the element of the development plan most pertinent to this SPD, can be found here:

<https://www.enfield.gov.uk/services/planning/adopted-plans#edmonton-leaside-area-action-plan-2020>

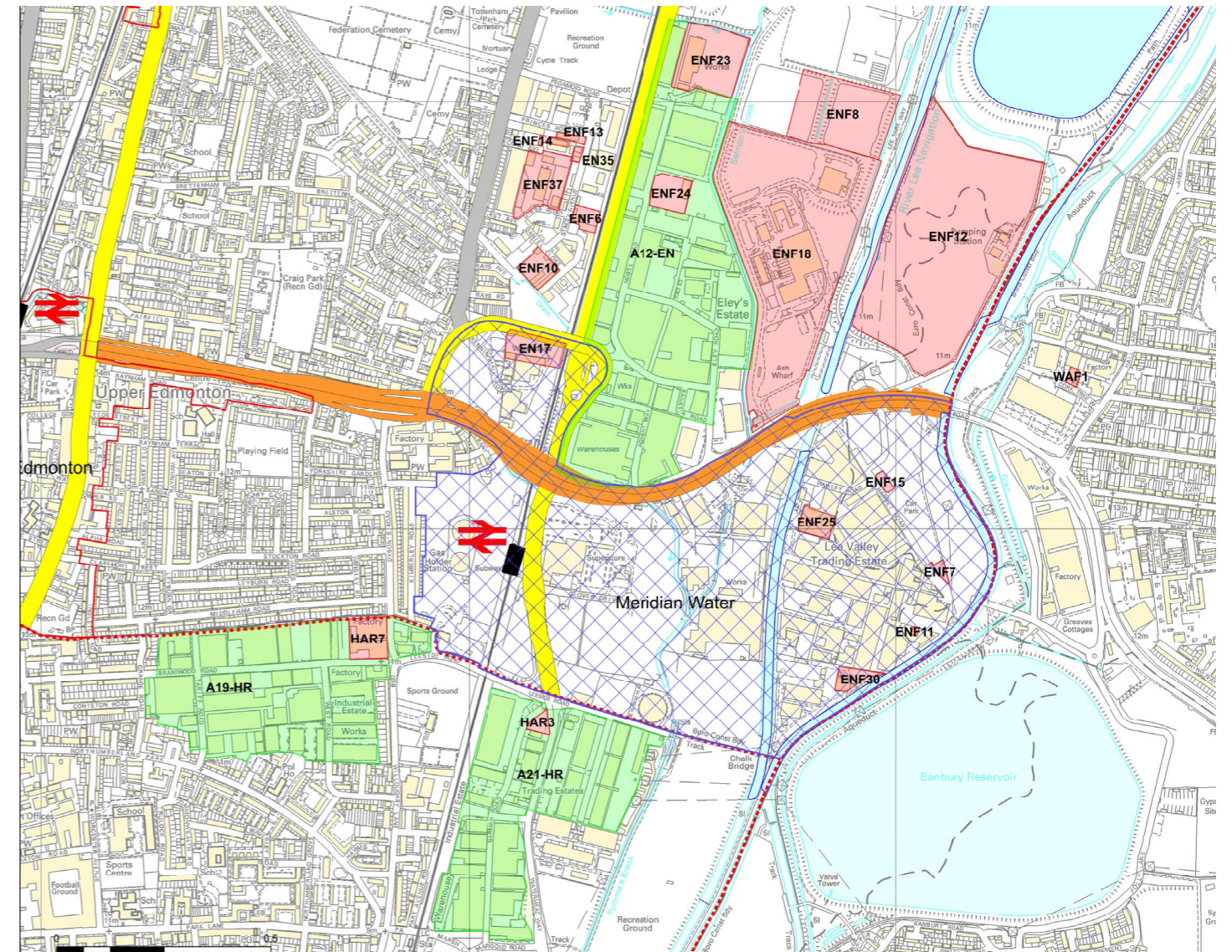


Figure 1.3: Safeguarded waste sites and Priority Areas for New Waste Management Facilities

- Key
- Meridian Water SPD
  - Safeguarded Existing Waste Sites (NWLP Policy 1)
  - Priority Areas for New Waste Management Facilities (NWLP 2)
  - Borough Boundaries

# Context



Image 3: View of Meridian West from East



## 2.0 Context

2.1 The context within which Meridian West sits is shown in Figure 2.1. The SPD area is currently occupied by large format stores and cleared former industrial sites. Ravenside Retail Park, situated in the north east of the SPD area, accommodates three large format retail stores, while Tesco and IKEA stores and associated car parking are located in the centre of the SPD area. IKEA closed the store on 31st August 2022 and intend to put the land and buildings up for sale.

2.2 Whilst the SPD area was traditionally occupied by industrial-related businesses, initial consents have been granted for mixed-use redevelopment of the area, including Phase 1 (ref 16/01197/RE3) which will deliver up to 725 homes, and Phase 2 (19/02718/RE3) which will deliver up to 2,300 homes. The first stage of this Phase 1 consent is currently under construction, providing 300 homes. Strategic Infrastructure Works (SIW) have been consented (ref 19/02717/RE3) which will deliver the east-west central spine road and utilities corridor, bridges, and flood remediation works. A reserved matters application has also been granted for Plot Z02-01 of Phase 2, including the delivery of 274 homes (22/02098/RM)

2.3 In addition, a live planning application is at the time of writing under consideration – for Phase 1b (21/04742/FUL).

2.4 The SPD area is traversed by Pymmes Brook and Salmons Brook, watercourses which meet in the centre of the area. The Lee Navigation forms the eastern boundary of the SPD area. To the east lies Harbet Road Industrial Estate, designated Strategic Industrial Land (SIL)<sup>1</sup>. Beyond Harbet Road lies Edmonton Marshes, designated Green Belt and part of Lee Valley Regional Park. To the north lies Eley's Estate, designated SIL, which is separated from the SPD area by a section of the North Circular Road. The southern boundary of the SPD area is formed by the boundary with LB Haringey along Leaside Road, with Brantwood Industrial Estate and Tottenham Marshes lying immediately south of the SPD area. Meridian Water rail station sits west of Angel Edmonton Road, with the existing residential community of Edmonton forming the western boundary of the SPD area.

2.5 Whilst the LB Enfield is the landowner of large parts of the site, IKEA, Prologis and the Tesco own significant parts of the SPD area. Tesco are the freeholders whilst British Steel Pension Fund have a long leasehold interest.

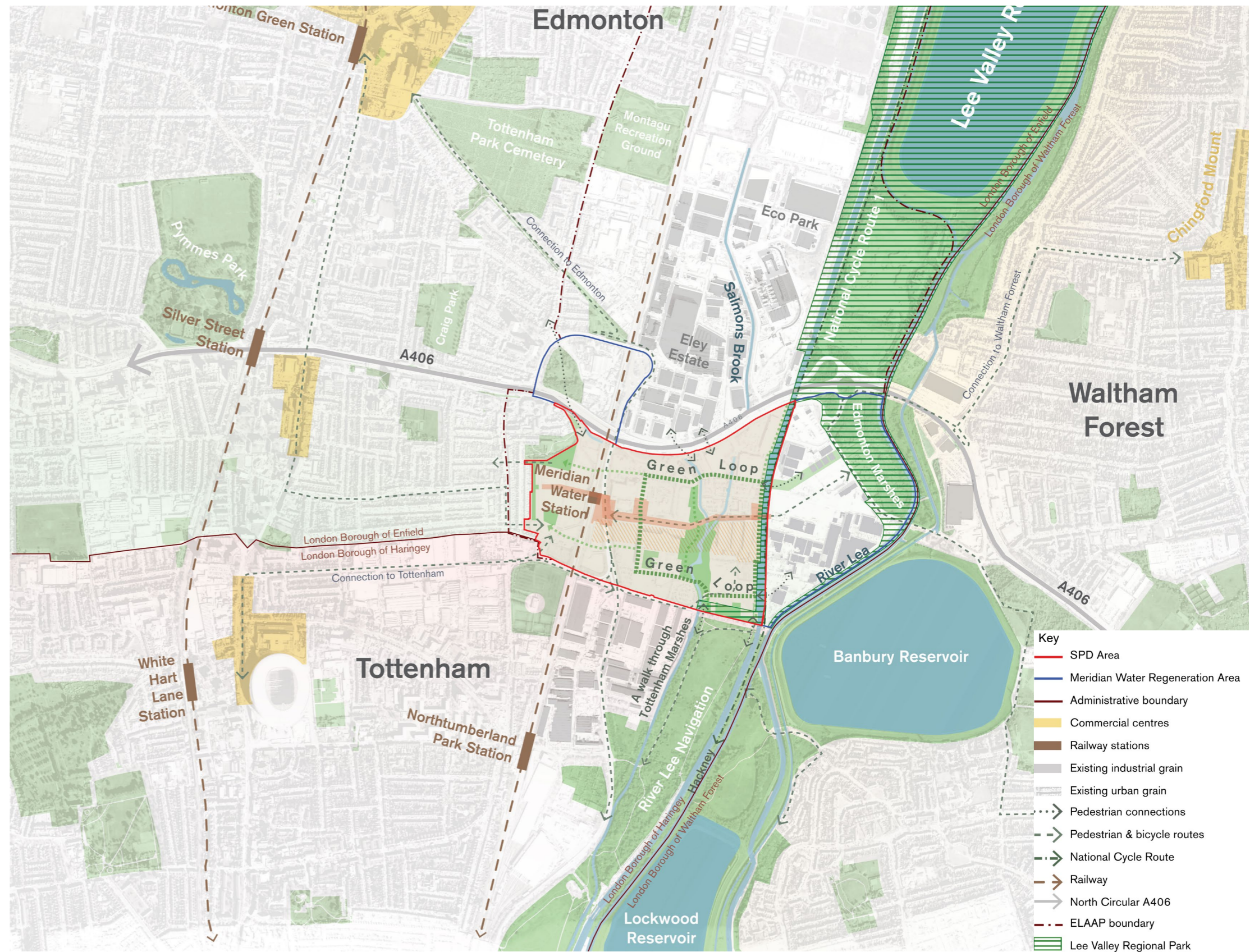


Figure 2.1: Meridian West SPD area and its surroundings

<sup>1</sup>In the Core Strategy, Edmonton Leaside AAP and London Plan

## Site constraints and opportunities

- 2.6 Meridian West is home to overlooked natural assets – it is the site of the confluence of Salmons Brook and Pymmes Brook and is bounded by the River Lee Navigation, a short distance from the Lee Valley Regional Park and Green Belt. It is an area in transition – Strategic Infrastructure Works will help address issues of flood risk, and large parcels of land have been assembled and cleared pending redevelopment.
- 2.7 It is located close to thriving industrial districts, near Strategic Industrial Land in Enfield and Haringey. This busy part of London has heavily trafficked routes of the North Circular Road, Angel Edmonton Road, and the section of Leaside Road to the west of Angel Edmonton Road.
- 2.8 There are opportunities to uncover and celebrate blue and green assets, create new green spaces and naturalise watercourses. Development offers opportunities to effectively knit the area into its surroundings, and to deliver new jobs and homes with a new town centre at its heart. Sensitive buffering and public realm improvements will help ensure that existing and new activities in the area can thrive.

### Key

- Flood Risk**
- Contrasting uses / activities**
- Heavily trafficked roads
- Strategic Industrial Land (SIL)
- Busy junctions
- Links (all modes)**
- Potential access to SPD area
- Existing walking/cycling (incl. NCR footbridge)
- Meridian Water Railway Station
- Adjacent borough boundary
- Railway**
- Green Blue Infrastructure**
- Existing open space
- Existing watercourses/reservoir
- Culverted watercourses
- Edge of the green belt
- Opportunity for naturalisation and deculverting
- Phase 2
- Phase 1
- SIW
- Primary substation

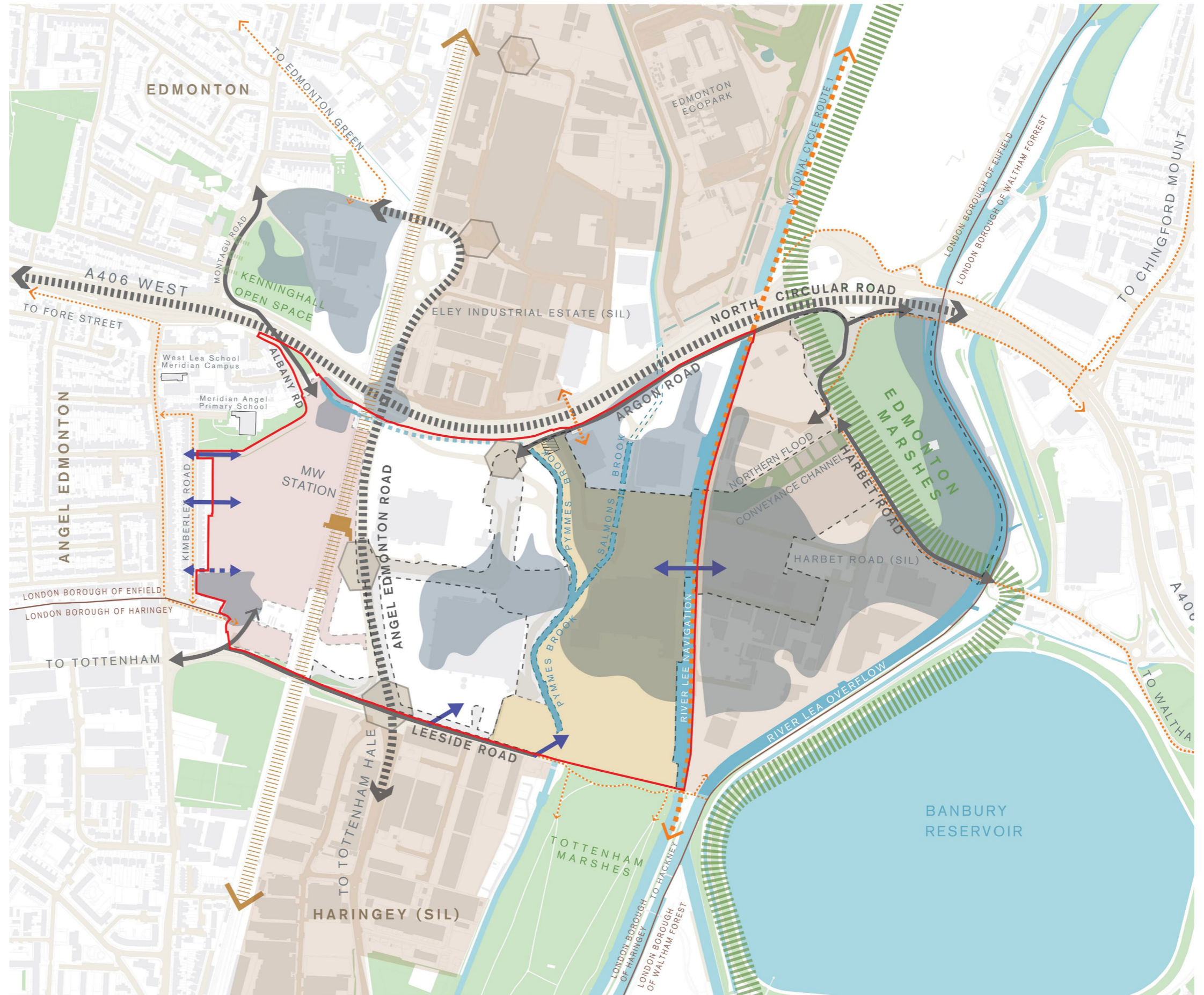


Figure 2.2: Constraints and opportunities

# Vision and Objectives



Image 4: Indicative artists-impression of development

### 3.0 Vision and Objectives

#### Vision

By 2032, Meridian West will be transformed into a highly sustainable mixed-use part of the Edmonton community, providing new homes and jobs well served by community infrastructure. This major regeneration project will attract investment to deliver good growth for the benefit of local communities and future residents. New housing within the area will be delivered, including affordable housing to address the needs of families in the borough. Improved and restored waterways and new open spaces will knit this new community into the rich blue and green networks, helping to open up access to the Lee Valley Regional Park. New healthy streets and an improved green network will provide walking and cycling routes, which along with better bus routes and the new train station will help residents move around easily and improve access to Meridian Water. A range of workspaces will be delivered to provide a range of job opportunities, supporting an economy that works for everyone. Developments within Meridian West will be designed to ensure that existing surrounding businesses can continue to thrive.

- Key
- Improved links
  - New access to SPD area
  - Key bridges
  - Improved junctions
  - New/improved walking and cycling links
  - The main street
  - Vehicular access points
  - Town Centre indicative boundary
  - The Broad Band
  - The Green Loop (including walking and cycling)
  - Green connections (including walking and cycling)
  - Green corridor
  - Parks
  - Brooks Park extension
  - Naturalisation of brooks and culverts
  - Buffer zone along River Lee Navigation (SIL on east bank)
  - Buffer zone towards south (SIL)
  - Buffer zone along heavily trafficked roads
  - Flood Risk (post SIW/MW Phase 2 scheme flood mitigation)

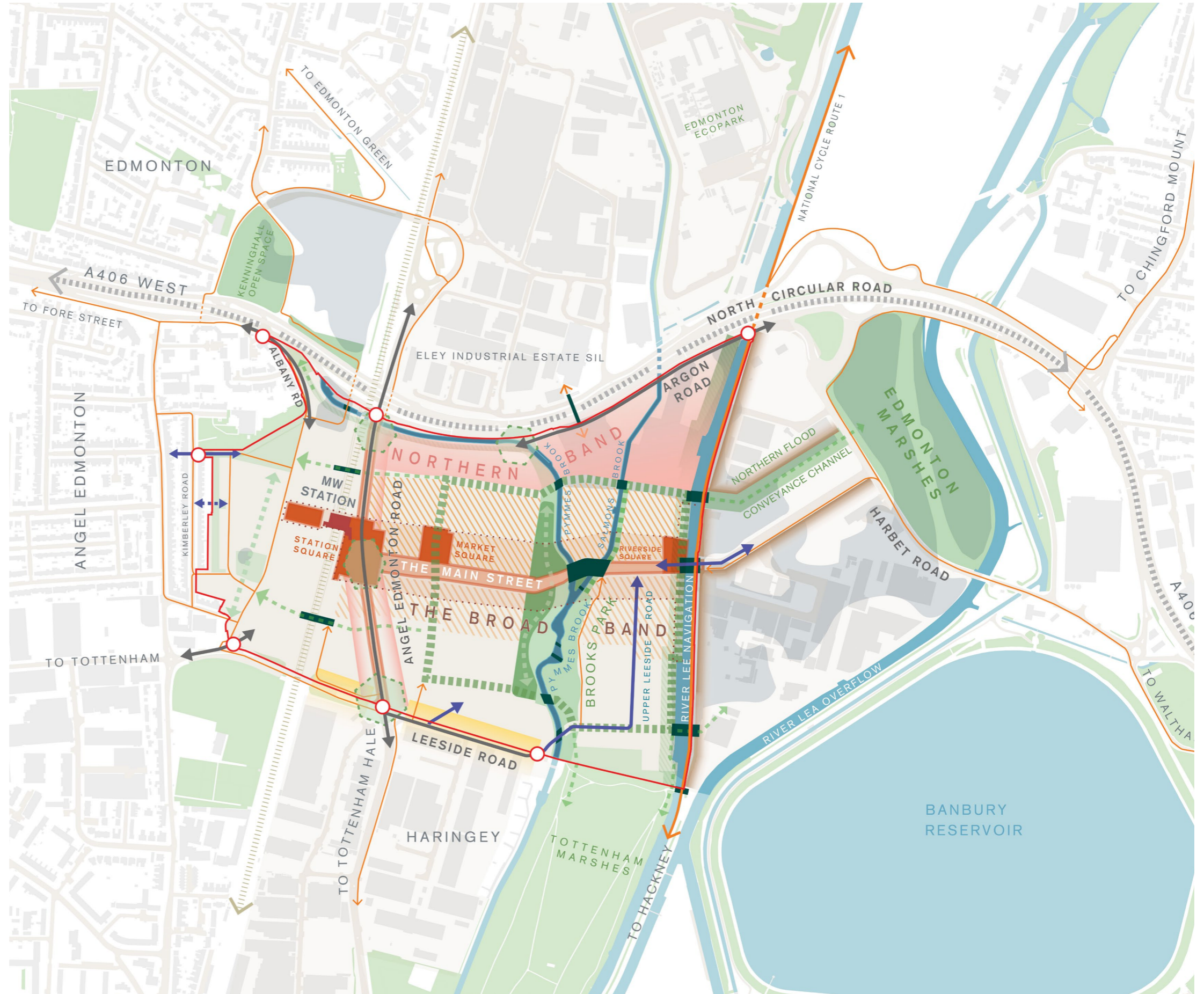


Figure 3.1: Meridian West Vision

## Objectives

3.1 Following on from the Vision, the Objectives for Meridian West build on the general objectives for ELAAP. These Objectives are:



### Building a Sustainable Urban Neighbourhood

Deliver around 5,000 well designed net zero homes, with a mix of tenures, products and sizes to meet existing and future housing needs, supported by high quality public realm, open space and play facilities, and social infrastructure such as new schools, health and community facilities.



### Facilitating Economic Growth

Deliver improved commercial opportunities and employment, building on the existing employment base in Meridian West and Meridian Water as a whole to deliver higher density workspaces suitable for higher value-added sectors, creating more high-quality employment. A new town centre will serve as the focus of new employment, as well as a hub for wider commercial and community activities, serving as a vibrant, inclusive and safe heart to Meridian Water – meaning there will be greater opportunities for communities to come together and form strong, positive relationships. The new town centre will provide a varied retail and leisure offer that meets the needs of the growing business and residential communities within a high-quality public realm served well by public transport.



### Connectivity

Improve bus connectivity to the site, including the provision of new bus stops on Glover Drive, and deliver rail improvements. Promote active travel with new healthy streets and parks to deliver improved connections, both east-west and north-south, connecting to the Lee Valley Regional Park, Angel Edmonton, Edmonton Green, and other destinations. Ensure that Main Street (also known as the Central Spine) is delivered to serve as the key new east-west access road and utilities corridor, linking to a new street network that priorities public transport and active travel.



### Deliver Sustainable Regeneration

Ensure low carbon development (both commercial and residential) through connection to the Meridian Water Heat Network. Promote sustainable movement and transport and circular economy principles (where construction materials are re-used, and recycling rates are improved). Deliver climate resilient development which can meet the challenges of the future. Ensure an uplift in biodiversity across the site through the provision of new multifunctional green spaces linking to existing green networks, and naturalisation and restoration of watercourses.



### Celebrating the Lee Valley Waterways and Open Spaces

Take opportunities to improve access to the Lee Valley Regional Park, enhance blue/green networks, make the most of waterway assets to optimise opportunities for positive placemaking, and manage water sustainably to ensure effective flood risk management. Maximise opportunities to restore and enhance waterways and riparian habitats, to improve geomorphology and increase biodiversity.

# Guiding Principles



Image 5: Example of landscaped green link

## 4.0 Guiding Principles

### Movement and connectivity

- 4.1 As recognised by the ambitions of ELAAP, the regeneration of Meridian Water must deliver improved accessibility by sustainable means – including active streets which prioritise pedestrian and cycle movement, better bus links, and less reliance on the private car.
- 4.2 The vision in ELAAP, and policies EL21, 22 and 23, set out to achieve a modal shift towards public transport, walking and cycling. The indicative Connectivity Plan provided in ELAAP (at Figure 5.2) embeds the principle that development must deliver good connectivity within Meridian Water and to the wider area.

### Guiding principle 1: Movement and connectivity

1. Development should be designed to support, enable, and encourage people to engage in active travel. Movement by foot and cycle should be prioritised over any other mode of transport. Movement by the private motor car should be given the lowest priority.
2. Development should facilitate the delivery of Main Street (the 'Central Spine') to improve connections to the Lee Valley Regional Park.
3. Development should contribute to the improvement of the existing movement network, including improvements to the street, junctions and environment of:
  - a. Angel Edmonton Road/Meridian Way (in particular improvements from Meridian Water Station across Meridian Way as a key gateway into the heart of Meridian Water)
  - b. Leaside Road
  - c. Argon Road
  - d. Connections under North Circular
  - e. Footbridge over North Circular
4. Works to the existing movement network should prioritise pedestrian safety and comfort and seek to overcome issues of severance.
5. Development proposals will be required to make adequate provision for new walking and cycling routes, ensuring they connect to the wider movement network, public realm and publicly accessible open spaces. New links to the surrounding area should be prioritised, these include:
  - a. Foot and cycle bridge over the railway lines
  - b. From Main Street to the surrounding area
  - c. Walking and cycling route to Edmonton Green
  - d. Bridges across the Lee Navigation and Pymmes and Salmons Brooks
  - e. Links across to Kimberley Road
  - f. Links facilitating access to Tottenham Marshes
6. Bridge crossings must be designed to a high quality as key placemaking features and in a sympathetic manner to the waterways beneath.
7. Development proposals will be expected to bring forward local and secondary streets in the appropriate locations as part of a street network strategy agreed with the Council through pre-application discussions or masterplanning processes. Street widths should make adequate allowance for green corridors.
8. Development proposals will be expected to deliver or contribute to public transport improvements, such as bus infrastructure (including frequency and bus stops) and rail infrastructure (such as necessary improvements to the station to improve accessibility to cater for the uplift in workers and residents).
9. Developers will be expected to either deliver the transport and connectivity improvements noted above as part of their development proposals or provide financial contributions towards their delivery through Section 106 agreements, including key pedestrian/cycle bridges.

- 4.3 In bringing forward development proposals, active travel (walking and cycling) should be given the highest priority, followed by public transport, then freight and servicing, with private transport given the least priority. This applies to the street network and should be reflected in the design of all development proposals.
- 4.4 The existing movement network presents challenges for pedestrian comfort and safety. Developments will be required to deliver improvements to existing streets, including through improvements to the public realm and crossings to address issues of severance.
- 4.5 New links from the SPD area are essential to effectively integrating Meridian West into its surrounding area. In line with point 5 of Guiding Principle 1, developments should not inhibit the delivery of new routes linking Meridian West to its surroundings and should seek to improve connectivity. There are opportunities to safeguard and improve access to the Lee Valley Regional Park at Leaside Road, including the existing footbridge.
- 4.6 New routes and connections, including bridges, should be delivered on site, or through financial contributions. Developers are encouraged to engage with the Council and the Canal and River Trust prior to any planning application submission on the location and design of new bridge connections across watercourses.
- 4.7 Care should be taken to create well designed, enjoyable spaces beneath bridges, especially where these form part of the canal edge or towpath. A key issue for consideration is the cumulative impact of these crossings in terms of their visual and ecological impact on the waterway corridor.
- 4.8 The Council was successful in securing investment for a new train station at Meridian Water, which opened to the public in 2019. Whilst the station is substantially complete, planning contributions may be sought for improvements, such as platform extensions. The Council is also pursuing a higher frequency train service, with a full business case approved by Network Rail.
- 4.9 As part of the Phase 1 and Phase 2 planning and Strategic Infrastructure Works consents, for which detailed transport assessments were approved, and in line ELAAP, a package of transport improvements have been secured at Meridian Water to ensure the delivery of high quality transport infrastructure and to mitigate the impact of development on the wider area. It is anticipated that this should improve the PTAL level to 3. Measures include improvements to support active travel, with public realm provision to facilitate walking and cycling, road and junction improvements (e.g. Leaside Road), and a new network of roads supporting public transport access and active travel, such as the Central Spine Road (Main Street), and Upper Leaside Road.
- 4.10 A package of bus route improvements has been secured, including re-routed bus routes, increased frequency and new facilities including bus stops. This includes contributions to TfL for additional east-west services through Meridian Water from the A406 North Circular (444 and 34 bus routes), and route alterations and increased frequency to the 192 and 341 bus routes. Other routes will be considered and discussed with TfL going forward, such as an extension to the 456 bus route that stops at North Middlesex Hospital.
- 4.11 As development at Meridian Water comes forward and evolves, the Council will assess and monitor transport elements closely and work with key stakeholders, such as neighbouring boroughs, TfL and public transport passenger groups. The Council is working to produce a Transport Assessment that will come forward as part of the new Local Plan.
- 4.12 Development proposals should have regard to active design principles, to encourage physical activity and help create a vibrant and safe public realm. Sport England and Public Health England have published draft Active Design principles and draft guidance, which may be of assistance in formulating development proposals<sup>2</sup>.

<sup>2</sup> <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design>



**Street Network and junction improvements**







- Key
-  Primary streets
  -  Main street
  -  Bus only
  -  Bridges
  -  Junctions to be improved
  -  Entry points



Figure 4.1: Street Network and junction improvements

**Indicative active travel and bus connections**

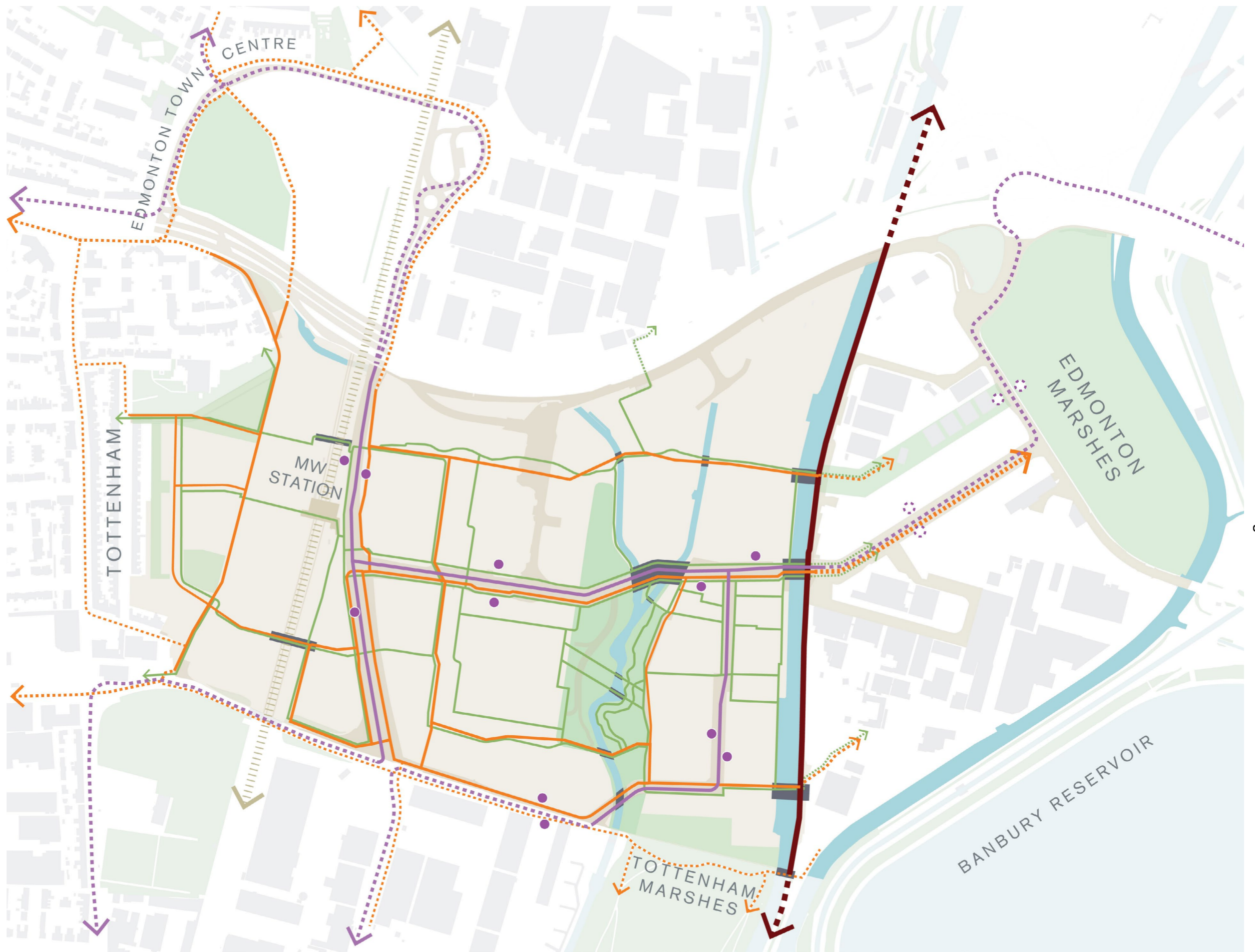


Figure 4.2: Indicative active travel and bus connections

## Sustainable Places

4.13 'Building a sustainable urban neighbourhood' is the first objective of ELAAP, whilst objective 4 sets out key principles for delivering sustainable regeneration, including low carbon living and working, and connection to the Meridian Water Heat Network (MWHN). The following guidance sets out how carbon reduction can be delivered in the sourcing of energy and materials, and in the operation of buildings. This section then sets out a guidance framework for the delivery and improvement of blue and green spaces, to enhance biodiversity and climate resilience. Finally, guidance sets out measures to control the impacts of construction.

## Carbon Reduction

4.14 In 2020, the Council adopted the [Climate Action Plan](#), which sets the ambition for Enfield to be a carbon neutral borough by 2040. The London Plan requires developments to contribute towards the UK target to become zero-carbon by 2050 by increasing energy efficiency and utilising low carbon energy sources<sup>3</sup>. The Council as master developer have adopted the Meridian Water [Environmental Sustainability Strategy](#), and encourages developers to implement the sustainability measures in the strategy.

4.15 Further, the Meridian Water Heat Network (MWHN) is being implemented by [Energetik](#) (a community heat network operator established by Enfield Council) to provide a source of low carbon heat to residential and commercial developments in the Meridian Water area.

4.16 Providing further guidance on the policy framework set by the Development Plan (in particular London Plan policy S13, ELAAP policy EL26, and DMD policies 51 and 52), the following provides detailed guidance to the overall requirements on the provision and management of energy and carbon reductions in the SPD area

4.17 In line with the London Plan, Guiding Principle 2 sets out means by which carbon can be reduced in the construction and operation of development. This includes employing smart and efficient systems ('be lean'), connecting to the MWHN ('be clean'), the installation of PVs ('be green') and monitoring performance ('be seen').

4.18 Developers will be encouraged to exceed low embodied carbon and circular economy measures set out in the London Plan. Enfield Council have established the [Excess Materials Exchange](#), a platform to facilitate the reuse of materials and to enable connections between 'donor' and 'recipient' construction projects.

4.19 Carbon offsetting should align with the requirements of the adopted development plan.

4.20 Developers are encouraged to consider high-quality local offsets for embodied carbon emissions, to align with UKGBC's definition of net zero (regulated, unregulated and embodied carbon emissions).

## Guiding principle 2: Carbon reduction

### Low carbon energy supply

1. All developments need to minimise carbon from heating and cooling through connection to the Meridian Water Heat Network (MWHN), by ensuring all connections and networks meet Energetik's standards, to maximise efficiency and minimise heat loss.
2. All developments should maximise the installation of photovoltaic equipment.

### Smart and efficient systems

3. Developers should consider the installation of smart systems to provide information to reduce overall and peak energy use and optimise the use of renewables.
4. Electric vehicle charging infrastructure should be maximised where the provision of vehicle parking spaces is unavoidable.

### Low embodied carbon and circular economy

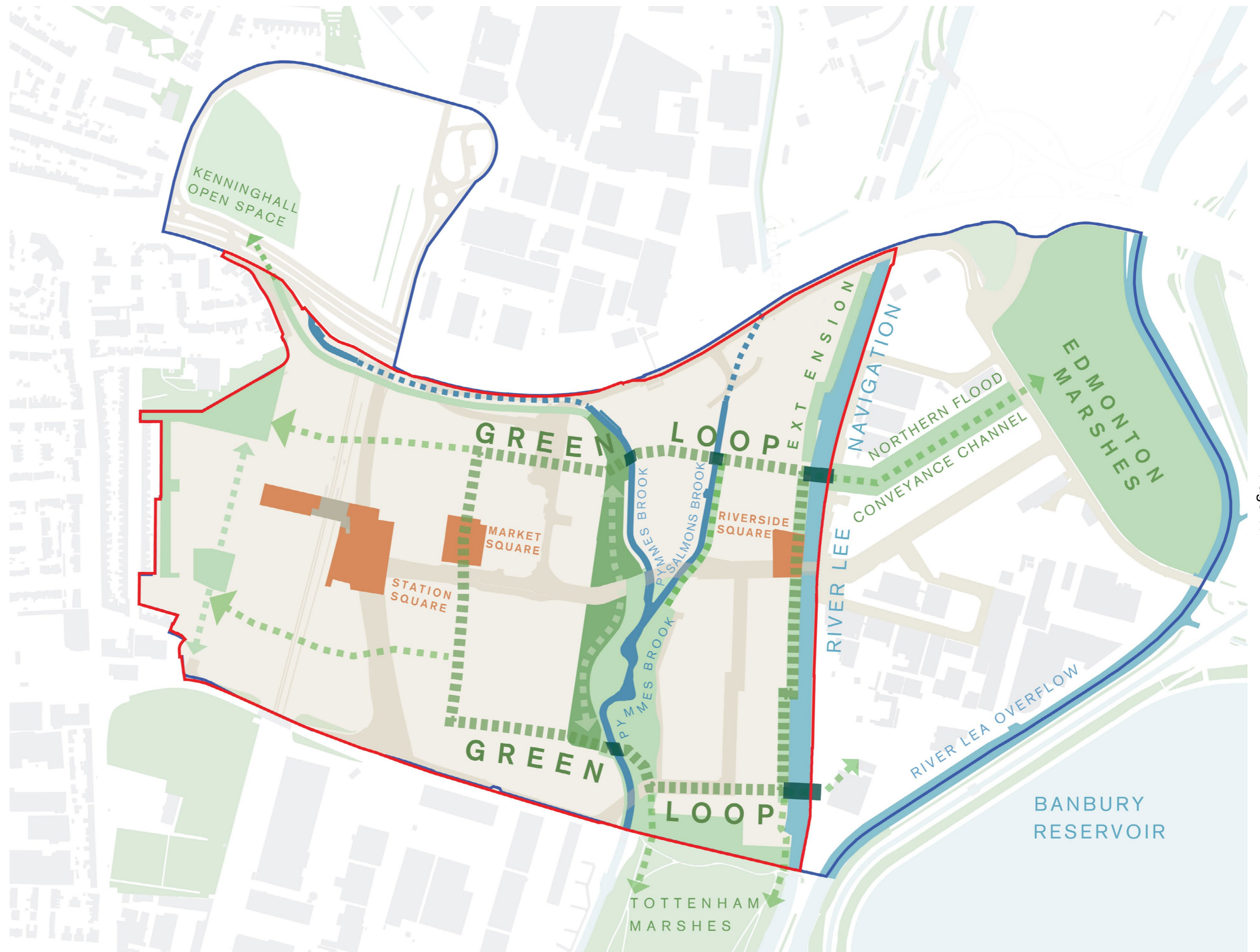
5. Developers should seek to minimise embodied carbon. In design and construction, developers are encouraged to minimise whole life material use, sourcing of materials and products sustainably, responsibly and ethically, eliminate single use plastics and support the circular economy.

<sup>3</sup> London Plan policy S12: Minimising greenhouse gas emissions

## Blue and green network

- 4.21 Meridian West sits within a rich natural environment – close to Tottenham and Edmonton Marshes, bordering the Lee Valley Regional Park, and a short distance from the metropolitan Green Belt. The River Lee Navigation traverses the area, and Pymmes Brook and Salmons Brook converge in the heart of the SPD area.
- 4.22 These green and blue assets present opportunities to better link Meridian West into its natural surroundings, with scope to create new green spaces that link with those existing in the vicinity, and to naturalise watercourses to enhance riparian habitats to provide improved geomorphology and biodiversity. Crucially, an expanded and improved green network will provide open spaces for residents, workers and visitors, delivering multiple benefits.
- 4.23 A key element of ELAAP’s objective 4 ‘Delivering sustainable regeneration’ is to provide the conditions for increased biodiversity. A means of achieving this aim is the creation of a green network, linking up new green spaces with existing green spaces and watercourses. An indicative Green Network Plan for Meridian Water is presented in ELAAP (Figure 5.3). Brooks Park, the Green Loop and the River Lee Navigation form key elements of the green network, as set out in Figure 4.3 below. Whilst Brooks Park is being provided through the SIW consent, future phases of development should enable the expansion of Brooks Park to the west (on the IKEA site).
- 4.24 Opportunities for the protection, enhancement, promotion and management of habitats and natural features should be taken wherever possible, promoting the associated benefits of eco-system services and of climate resilience. The guidance below flows from Core Strategy Policy 36, ELAAP policy EL28 and DMD policies 78, 80 and 81.
- 4.25 Opportunities should be taken to maximise biodiversity gains beyond the statutory minimum. Swift bricks and bat boxes are examples of features which could be incorporated to achieve benefits for wildlife. Best practice guidance in this regard has been published by the Chartered Institute of Ecology and Environmental Management.
- 4.26 Priority should be given to enhancing green links with Sites for Metropolitan Importance for Nature Conservation, which are located along the Lee Navigation, southern boundary of Harbet Road Industrial Estate and Edmonton Marshes. This includes River Lee Navigation Site of Metropolitan Importance for Nature Conservation (SMINC). Whilst there should be habitat in all green spaces, green links should seek to incorporate clear areas of undisturbed habitat e.g. riparian buffer zones with no footpath, lighting or amenity furniture.
- 4.27 New green spaces should be provided at a variety of scales across the SPD area, and be planned and managed to provide ecologically rich connections through the urban fabric. Green Spaces should be multi-functional and provide a range of functions, including habitats, play spaces, pedestrian and cycle movement, and recreation. Figure 4.3 sets out the key features of the green network to be delivered at Meridian West. Across the SPD area it is expected that there will be a significant increase in tree planting. Whilst there are few trees currently on site, any trees proposed to be lost as a result of development should (as a minimum) be replaced, as part of a coherent placemaking approach to deliver a step-change improvement in urban greening, which may mean that whilst there will be a substantial increase in tree planting, it may not be possible to replace trees in the precise location of the original.
- 4.28 Proposals for Lee Navigation linear open space south of the Green Loop should facilitate north-south movement and support active frontages with the potential for spill-out public activity along the waterfront. The Lee Navigation Linear Open Space north of the Green Loop should prioritise habitats and the biodiversity function of the green space. All footpaths and cycleways should facilitate sustainable drainage.
- 4.29 The Green Loop concept is that of a continuous linear park ‘looping’ through the heart of Meridian Water, providing open space and other amenities. Its nature will change depending on the development and location, but it should be primarily ‘green’, sufficiently wide enough to accommodate a continuous green buffer and a formal pedestrian footpath, with emergency vehicle and servicing access and a two-way cycle path. As a guide the optimum width of the Loop at its would be between 20 and 30 metres. It should provide a green vegetated setting, with capacity to also include amenity and play space, bio-diversity features and flood attenuation areas/measures. Figure 4.3 section drawing below illustrates this.
- 4.30 Figure 4.3 sets an indicative route for the Loop. There is a need for flexibility on the route to factor in the optimum position within development proposals and in relation to the provision of infrastructure. However, important nodes that need to be connected to the Loop include the Lee Navigation and the Lee Navigation Linear Open Space (where there is a water frontage to consider), the brooks (including crossings over them) and Brooks Park, Market Square, and preferably extension to Angel Edmonton Road. There is scope for social infrastructure (for example, a school) to be located adjacent to the Green Loop to benefit from active travel access, the open space and play space, and other benefits provided as part of the Green Loop. Proposals for development on adjacent sites will be expected to ensure a seamless connection between sections of the Loop for both people and wildlife.
- 4.31 Proposals for the western expansion of Brooks Park should include earthworks on the western bank of Pymmes Brook to provide soft attenuation basins to attenuate run-off from adjoining development sites.
- 4.32 Watercourse naturalisation is a broad term which can range from full scale restoration of the watercourse (including natural banks, meanders, gravel bars, ponds and varied vegetation) to the implementation of naturalisation methods (including the removal of concrete banks, and the introduction of vegetation). Feasibility studies should be undertaken to scope out the most appropriate form of watercourse naturalisation, with a view to getting as close to full scale restoration as technically feasible. Watercourse naturalisation schemes should have regard to any nearby naturalisation schemes to maximise improvements and ensure a joined-up approach. Proposals should have regard to the Environment Agency’s requirements on watercourse naturalisation, as well as guidance on biodiversity, geomorphology, flood risk, and contaminated land.
- 4.33 The guidance above gives an indicative list of surface water management measures. Measures employed should have regards to the Mayor of London’s drainage hierarchy, prioritising using rainwater as a resource (rainwater harvesting, blue roofs for irrigation) first, rainwater infiltration to ground or close to source second, and then rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens) third. Any surface water discharge to the River Lee Navigation would require prior consent from the Canal & River Trust.
- 4.34 Intensive green roofs should be employed for their biodiversity value, as well as rain gardens for their visual and habitat value. Below ground attenuation measures and pumped systems should be avoided. It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding. Surface water management should have detailed, long-lasting and accountable management plans in place to ensure they continue to effectively filter pollutants and silt. SuDS features need a clear and accountable maintenance regime to ensure these features continue to be effective, particularly with regards to sediment and pollution control measures
- 4.35 For the culverted section of Pymmes Brook that runs parallel to the A406 North Circular in the north of the SPD area, naturalisation (including removal of the mid-channel wall) and access to sufficient daylight is encouraged where feasible.
- 4.36 The Pymmes Brook [walking trail](#) is popular recreational route, revealing the brook and it’s connections to habitats and neighbourhoods in Enfield. A Salmon’s Brook walking trail is planned. Meridian Water is key a node on the routes, and as such, development proposals should endeavour to provide toilets and refreshment facilities and seek to relocate walking route signage.

# Blue and Green Network



## Key

- - - - - The Green Loop (indicative route)
- - - - - Green connections
- - - - - Extension of Lee Navigation Linear Open Space
- New park (indicative area)
- Naturalisation of brooks
- Culverted brook
- Pedestrian and cycle bridges
- Indicative civic spaces with a mix of hard landscaping and planting

Figure 4.3: Blue and Green Network

### Guiding principle 3: Blue and green infrastructure network

#### Biodiversity and nature recovery

1. All developments should significantly enhance the blue and green infrastructure network and restore, enhance and increase wildlife, biodiversity and geomorphology. Trees, vegetation, gardens and open spaces should be used to create a strong, soft green character to streets. Tree planting, including street trees, should be included as part of development proposals. Priority should be given to species which offer good canopy cover and high biodiversity value.
2. Developments should deliver at least 10% Biodiversity Net Gain (BNG) on site and will be encouraged to exceed this statutory minimum.
3. Planting must be consistent with the habitats and character of the Lee Valley Regional Park and must be composed of a diverse range of native species in accordance with the Lee Valley Biodiversity Action Plan (and any updating successor), whilst also ensuring species choice is resilient to climate change.
4. New and improved green and blue spaces should maximise opportunities to maximise nature recovery potential by seeking to connect to Sites of Importance for Nature Conservation (SINCs) and link up existing and proposed blue and green assets wherever possible.

#### Green network and open spaces

5. Development proposals should deliver, facilitate, or contribute to the delivery of, the green network set out in Figure 4.3. This includes the following:
  - a. Brooks Park, including its westward extension
  - b. Green Loop
  - c. Lee Navigation Linear Open Space
  - d. Node located at the confluence of Pymmes and Salmons Brooks.
6. Public open spaces should accommodate a range of functions, including flood attenuation, recreation, pedestrian and cycle movement, and food growing (including fruiting trees). School playing pitches may be provided on nearby public open spaces where these cannot be feasibly accommodated on site.
7. Opportunities should be maximised for the inclusion of vegetation and blue spaces to address overheating and the urban heat island effect. Proposals for new buildings and public spaces should prioritise shading from trees and vegetation to ensure pedestrian and user thermal comfort.
8. Development will be expected to provide policy compliant levels of play provision, to help create a desirable and liveable neighbourhood for families. This should be provided through a combination of designated and informal playable space. Doorstep play must be provided within individual plots. Play space should be located in close proximity to homes in locations that receive good sunlight and surveillance and when sited in the public realm away from vehicles wherever possible. Play areas should consider wheelchair users and those with specific access needs.



Image 6: Artists impression of deculverted brooks

### Guiding principle 3: Blue and green infrastructure network

#### Blue network

9. Development should reduce flood risk through sustainable and natural flood risk management. Specific measures include:
  - a. Intensive and extensive green roofs.
  - b. Integrated ponds, wetlands and rain garden features in the Green Loop to manage surface water generated from the development.
  - c. Naturalisation and de-culverting of Pymmes Brook and Salmons Brook should be thoroughly explored, and reasonable endeavours should be taken to implement naturalisation and deculverting.
  - d. Where naturalisation and de-culverting are not possible, river improvements (such as introduction of gravels, improvements to geomorphology and sustainable and innovative urban habitat creation) should be employed.
10. Surface water management should aim for 100% source control. Rain gardens, swales, SuDS, tree pits, green roofs and permeable paving should be employed, depending on site conditions. Space must be provided above ground for attenuation measures.
11. Development should demonstrate how the location of proposed land uses informs the flood risk mitigation strategy. This could include siting open space and/or school playing fields on areas with highest flood risk.
12. Development should restore and improve the water environment for ecological, biodiversity, geomorphology, leisure, and visual amenity purposes.

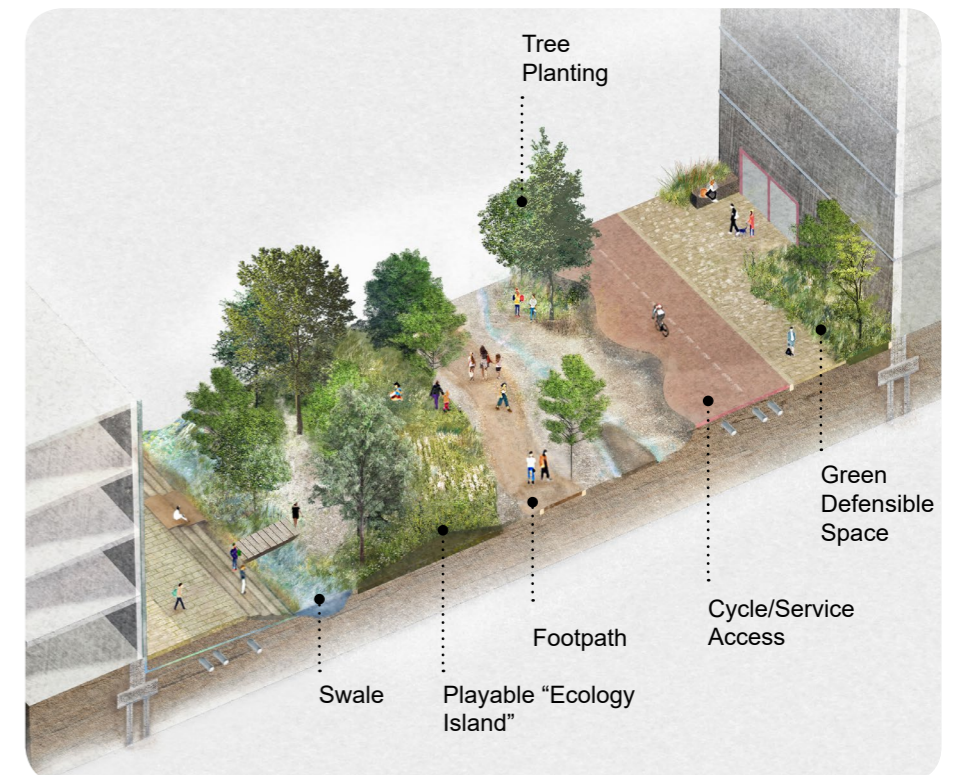


Figure 4.4: Green Loop - indicative axonometric view

## Sustainable construction management

- 4.37 The highest standards of construction management should be achieved to protect the amenity and quality of life of residents and visitors to Meridian Water over the 20+ year development of the site. Management arrangements should accord with London Plan Policy T7.
- 4.38 All planning applications should be accompanied by a Code of Construction Practice (or Construction Environmental Management Plan), including a comprehensive Construction Traffic Management Plan. Requirements in the Council's Development Management Document need to be addressed, in particular policy DMD49 and DMD57.
- 4.39 As significant levels of construction and earthworks are likely to continue following the completion of the initial phases of development, the guidance set out above seeks to ensure that the amenity of residents and their ability to traverse the area is not unduly affected by development. Conditions or S106 obligations may be used to manage impacts.
- 4.40 Whilst the use of the Lee Navigation for the delivery of construction materials and goods is encouraged, care should be taken to ensure this does not cause deterioration of the water body. Measures such as travelling at a slower pace to ensure reduced impact of erosion due to bow waves should be employed.

### Guiding principle 4: Sustainable construction management

1. In order to reduce the environmental impacts associated with deliveries of materials to and from the area, developers should implement construction logistics plans and should seek to ensure that:
  - a. All construction compounds should be located away from sensitive receptors, including existing residential properties, to avoid adverse impacts.
  - b. Site hoardings should be decorated and offer 'green screening' or public art opportunities for the local community and local artists.
  - c. Site hoardings should provide adequate signage for wayfinding purposes.
  - d. Public access walkways adjacent to construction hoardings / sites should be well lit.
  - e. Vehicular and pedestrian access should be retained, or alternatives provided.
  - f. Lighting should be sensitively employed, with a view to minimising disturbance to sensitive areas of the Lee Valley Regional Park, and
  - g. The use of the Lee Navigation for the delivery of construction materials and goods is encouraged.
2. Developers are encouraged to meet the Considerate Constructors Scheme.



Image 7. Reclaimed Bricks, LB Enfield - Materials Exchange



## Achieving mixed uses

4.41 This section provides further guidance from ELAAP on the appropriate type, location and mix of land uses in the SPD area, including, commercial, residential and social infrastructure, and setting out how the spatial development of a new Large Local Centre can be achieved.

## Homes

4.42 ELAAP recognises that Meridian Water will deliver around 5,000 homes on the Meridian West. Affordable housing should be delivered in line with development plan policy, as should housing size mix, in particular having regard to London Plan policy H10 and the borough's latest evidence such as the Local Housing Needs Assessment (2020).

4.43 Building on ELAAP policies, the following provides guidance on the principles for proposals for residential development. The guidance here mostly does not include or repeat higher level development plan policy on housing, such as housing size and tenure requirements.

4.44 The London Plan (paragraph 4.2.8) defines family-sized units as 3 bed plus homes. Family homes should not be overly concentrated in specific parts of Meridian West in the interests of creating mixed and balanced communities.

4.45 By diversifying the housing supply there will be more choice for residents as well as a provision for more innovative, liveable and sustainable homes. Housing models could include those products supporting the rental sector, such as Build to Rent and purpose-built shared living, and housing for those in later life.

4.46 All new development should adhere to fire safety regulations. The GLA have consulted on [draft Fire Safety Guidance](#), and appropriate weight will be given to London Plan Policy D12 and associated guidance in decision making.

4.47 It is imperative that residential buildings are designed to be resilient to a changing climate, using (for example) layout and landscaping measures to combat overheating, sustainable water management to address flooding risks, and green and blue infrastructure to help mitigate the urban heat island effect.

## Guiding principle 5: Housing and design quality

1. Development should offer a range of housing sizes in line with the Development Plan, including London Plan Policy H10.
2. Housing design should respond positively to the evolving context of development, taking into account extant planning consents and emerging masterplanning.
3. Family homes should be located throughout the SPD area with good access to open spaces, schools and other social infrastructure facilities. Residential buildings should provide a direct and positive relationship with the public realm.
4. Proposals for housing must be of exemplar design quality and sustainability. Contemporary design that is innovative is supported. Homes should have good levels of daylight and sunlight. Dual aspect dwellings should be maximised, with every single aspect home being fully justified and reasons for rejecting alternative typologies and layouts that achieve a higher proportion of dual aspect homes being given. North-facing single aspect homes will not be accepted.
5. Residential buildings should carefully consider connections to the outdoors through the careful placement of features such as gardens, terraces, winter gardens and yards. Buildings should be future-proofed by being built for adaptability to accommodate changing needs, climate resilience, and with the whole life cycle in mind.



Image 8: Indicative artist's impression of high quality housing development

## Commercial activity

- 4.48 The guidance in this section supports the 'Facilitating Economic Growth' ELAAP objective and flows from a number of ELAAP policies, including EL2 and EL3.
- 4.49 As set out in in ELAAP, there are opportunities to diversify and expand the employment offer at Meridian Water through the provision of a range of workspaces suitable for a variety of businesses, including higher value and knowledge intensive industries.
- 4.50 The principal locations for commercial development comprise the Main Street (enabled by the SIW consent), the Broad Band, and the Northern Band.
- 4.51 Main Street, also known as the Central Spine, forms the heart of Meridian Water West Bank and the commercial core of the town centre (see Guiding Principle 7 for further guidance on the delivery of the town centre). Main town centre activities should be concentrated along Main Street, including retail and food and beverage, to create a vibrant core to the new town centre. Development here should be designed to provide surveillance, activity and interest to the public realm. Extensive ground floor lobbies and blank frontages should be avoided.
- 4.52 The Broad Band is an area of commercial uses on the lower floors (such as workspaces) as part of mixed-use development. The needs of both residential and commercial occupiers should be carefully considered, with proper provision of yard and servicing space as well as residential outdoor space. Commercial uses at the western end of the Broad Band should have a strong design presence and active frontages given the prominent location adjacent to Angel Edmonton Road and the train station.
- 4.53 The Northern Band includes Ravenside Retail Park and land immediately south of the North Circular Road. The Northern Band realises ELAAP's intention, set out in Policy E11, to ensure that 'development adjacent to the North Circular Road provides a buffer for buildings deeper within the Meridian Water area, while providing a high-quality frontage to the road.' The intentions of ELAAP with

regard to this area are further elaborated at 5.4.12: 'Commercial uses would also be appropriate to the south of the elevated North Circular Road, taking advantage of a location with good access which is potentially suitable for higher building types, while providing a buffer for the residential areas.'

- 4.54 As such, development in the Northern Band should seek to buffer development to the south from the North Circular. Industrial and commercial uses, including SIL-compatible uses, are appropriate in the Northern Band. Noise and odour-generating activities in the Northern Band should be oriented north to reduce the risk of conflicts with residential occupiers to the south. Provision for yard and servicing space should be made in line with GLA guidance, including the Designing Industrial Intensification and Colocation LPG once adopted.
- 4.55 The commercial activity areas, particularly the IKEA site, have the potential to accommodate a strategic occupier. A 'strategic occupier' is considered to be a key employment-generating use that would act as a flagship presence or anchor at Meridian Water and would be an important placemaking element.
- 4.56 Meanwhile uses have a valuable role to play in activating future development sites and adding vitality and interest to an emerging neighbourhood. Given that IKEA have vacated its site there could be a lengthy period of vacancy, and as such the Council would support appropriate uses such as meanwhile cultural activities (including performance space).
- 4.57 Meanwhile uses could also animate and help evolve the town centre adjacent to the station and along Main Street. They could help provide services (such as pop up retail) for the growing community. Meanwhile uses should be designed to increase footfall, provide activity to dead or blank frontages, and discourage antisocial behaviour. At every stage of development there should always be a sufficient level of local amenity maintained to support residents and businesses.
- 4.58 Creative and cultural meanwhile uses have the potential to draw visitors and neighbours to the SPD area. However, adequate safeguards should be put in place to ensure the amenity of the area's growing residential population is preserved and that such uses not impact the wider area

## Guiding principle 6: Commercial activity areas

1. The main locations for commercial development in the SPD area is set out in Figure 4.5 are as follows:
  - a. **Main Street:** the principal east-west route should be the focus of town centre activities, including retail, food and beverage and community facilities.
  - b. **The Broad Band:** either side of Main Street, this mixed-use area should seek to accommodate commercial uses on the lower floors, including E (g) class uses. There is potential to accommodate a strategic occupier here in the IKEA site.
  - c. **The Northern Band:** south of the North Circular, this area is appropriate for commercial uses in the B2, B8 and E (g) iii use classes. Opportunities for multi-storey commercial development should be fully maximised.
2. There is potential to accommodate a strategic occupier within the locations identified in part 1 above.
3. Meanwhile uses should be considered in all locations where development has yet to come forward. Proposals for meanwhile uses should ensure that residential amenity is safeguarded, and wider impacts are appropriately managed.

negatively (such as impacts on the transport system). Key considerations include lighting, hours of operation, and routes from the site to transport nodes.



Image 9: Indicative artist's impression of high quality high street

**Commercial activity areas**



Figure 4.5: Commercial activity areas

## Town centre spatial development and appropriate uses

- 4.59 As set out in ELAAP policy EL3 (Meridian Water Town Centre), a 'new town or local centre' will come forward at Meridian Water. ELAAP envisages that the centre would be located in the area around the train station, along the Central Spine Road (now also known as Main Street), and part of the West Bank of the Lee Navigation.
- 4.60 The following guidance sets out the spatial development principles for the creation of a new vibrant town centre, including the location of three principal public squares.
- 4.61 Core Strategy and ELAAP indicate that Meridian Water will accommodate a new town centre. In the borough's town centre hierarchy, Meridian Water will be a 'large local' centre – smaller than a district centre but larger and more significant than a typical suburban shopping parade<sup>4</sup>.
- 4.62 Three main public squares are identified above. Part of 'Station Square' will be delivered through the MW Phase 1 consent, and 'Riverside Square' in an early plot delivery of Phase 2. These Squares are important to structuring the spatial development of the town centre, providing key focal points. In addition, there is potential for access to water-based activities at or in the vicinity of Riverside Square, with scope to accommodate associated facilities and moorings.
- 4.63 In line with ELAAP Policy EL3, there is potential for food and beverage activities to activate the River Lee Navigation close to Main Street.
- 4.64 Inclusive design principles should be adopted in formulating development proposals, particularly those schemes which will form part of the new town centre. Access, mobility and safety are key considerations in ensuring that the SPD area meets the needs of people of all genders. Development proposals should demonstrate a 'user-centred' approach to design, based on social space analysis and quantifiable data.

## Guiding principle 7: Delivering a new town centre

1. Town centre activities should be concentrated around the train station, along Main Street, and adjacent to where Main Street converges with the Lee Navigation. Uses here should contribute to delivering a vibrant mixed-use town centre, including retail, food and beverage and supporting uses. Other acceptable uses may include leisure, recreation, hospitality, floorspace for other commercial activities including creative and cultural industries and supporting social and community infrastructure including sport and leisure.

The indicative extent of the Centre is illustrated in Figure 4.6 below.

2. As the main thoroughfare for the town centre, development along Main Street should ensure that active frontages are presented to the public realm. Bus stops should be provided along Main Street. There is potential for food and beverage uses on the River Lee Navigation close to Main Street.
3. There is potential for the delivery of three public squares along Main Street (see Figure 4.6 below). These spaces could accommodate a range of opportunities for social interaction and cultural experiences, including outdoor dining and events.
  - a. 'Station Square', adjacent to the station, could act as a gateway to Meridian Water, with potential to accommodate a range of shops, food and beverage and leisure uses. Provision should be made for cycle parking, places for waiting, and pedestrian movement.
  - b. 'Market Square' could be a key focal point in the heart of Meridian Water. A range of town centre uses could be provided, as well as community and social infrastructure facilities. This could also be a key interchange between buses and active travel.
  - c. 'Riverside Square' has potential to provide a community meeting place and accommodate outdoor activities such as for play and events. Food and drink uses here could take advantage of the adjacent green and blue network.
4. Development should ensure the safe use of the town centre both through the day and into the evening for all users, regardless of gender. Inclusive design of the public realm should be a priority, for example in terms of overlooking, lighting, landscaping and a range of uses which encourage pedestrian / user activity beyond the traditional 8-hour working day

<sup>4</sup> Annex 1 of the London Plan states that district centres 'contain 5,000–50,000 sqm of retail, leisure and service floorspace.'

Town centre indicative extent

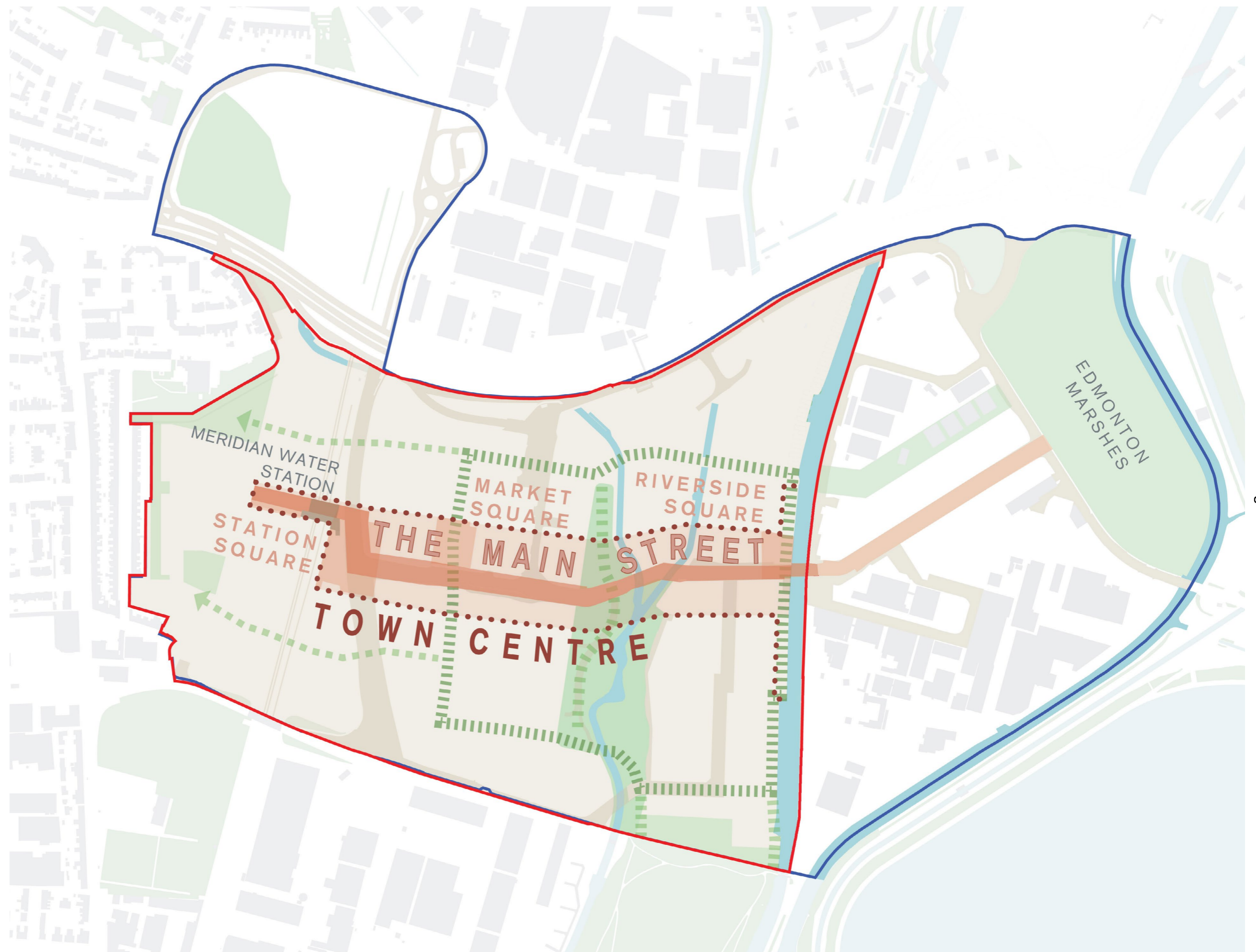


Figure 4.6: Town centre indicative extent

## Social infrastructure

- 4.65 ELAAP Policy EL5 sets out policies in regard to community facilities, predominately education and healthcare. The following provides further guidance on the provision of social and community facilities through development proposals at Meridian Water.
- 4.66 The delivery of social and community infrastructure that will help residents to lead active and sustainable lifestyles is essential to creating strong and inclusive communities. Section 5 of this guidance sets out key infrastructure items needed across the SPD area.
- 4.67 The following sets out guidance on the provision of community and social infrastructure through development at Meridian Water. This reflects the need for facilities going forward plus also that existing outline planning consents for the Council's Phase 1 development incorporates floorspace for health and leisure, and for Phase 2 a primary school and community floorspace.
- 4.68 As development proposals emerge, social and community infrastructure identification will need to be discussed with the Council, as well as through proactive engagement with key stakeholders, other developers and infrastructure providers. Key mechanisms for provision will be through direct provision by a developer, funding provided through the Community Infrastructure Levy (CIL) and Section 106 planning obligations.
- 4.69 The Council will work with developers bringing forward schemes to establish costs and apportionment arrangements. Where infrastructure items are intended to serve more than one development, negotiations will establish suitable apportionment arrangements.
- 4.70 The Core Strategy identified the need for two primary schools and a secondary school at Meridian Water, one school has already been delivered with a second secured via an existing consent. The estimated quantum of development on the IKEA site is likely to mean development would be required to deliver a third school. Early years facilities should be provided as a mix of nursery classes at local schools, children's centres and privately-run pre-schools and nursery groups.

Development proposals should demonstrate how detailed design, layout and access to open space will meet operator requirements.

- 4.71 In addition to Meridian Angel Primary school and the primary school consented in Phase 2<sup>5</sup>, the IKEA site is identified as an optimal additional location for a school, subject to child yield projections at the point of any planning applications for residential use. This is due to the strategic location and size of this site, which could place a school near the station and Green Loop/Brooks Park in close proximity to the Main Street and the train station, and the significant mixed-use redevelopment potential of the site and the number of homes this could provide.
- 4.72 Appropriately located indoor and outdoor sports and leisure facilities will be needed as a result of development at Meridian Water. An indoor leisure facility is being provided through the Council's Phase 1 development, and further provision will likely be required in line with increases in the residential population. The type, amount and mix of facilities should be informed by a robust evidence base such as the Council's Playing Pitch Strategy and any robust and up-to-date strategy relating to indoor/built sport facilities. Existing and planned facilities are located nearby in the Lee Valley Regional Park (such as Pickett's Lock Athletics Centre). Complementary provision and programmes are encouraged.

## Guiding principle 8: Social infrastructure

1. Social infrastructure facilities must be sited in locations easily accessible by foot or bicycle and bordering the green loop wherever possible. Developers should provide or contribute to the provision of social infrastructure in line with development plan policies.

### Education

2. Supporting social infrastructure such as a school and open space will also be required to support development. The IKEA site presents an optimal location for a school.
3. Innovative school typologies that maximise efficiency of space should be encouraged due to the high density of development. Multiple storey schools, multi-use games areas and the incorporation of play spaces on roofs should be considered. Mixed use development of schools may be considered to maximise the use of land, e.g. alongside residential uses. Sports pitches and other outdoor spaces should be provided as close as possible to school building.

### Health

4. Development should ensure the safe use of the town centre both through the day and into the evening for all users, regardless of gender. Gender inclusive design of the public realm should be a priority, for example in terms of overlooking, lighting, landscaping and a range of uses which encourage pedestrian / user activity beyond the traditional 8-hour working day.

### Places of Worship

5. Provision should be based upon local need and priorities. Consultation and engagement should be had with local community groups and bodies, and the Council, to identify these needs and determine the most suitable facilities.

### Youth Provision

6. Consultation should be carried out with the relevant groups and organisations, including the Council, together with community leads, parents and carers, to understand changing needs which will change over time and will differ for different age groups. Indoor and outdoor provision could be through a multi-use youth facility which has the ability to provide flexible space and can be co-located with schools. The potential for co-design of future phases with the involvement of younger people should be explored.

### Sports and Leisure

7. Sports and leisure facilities can be provided as part of a centre that can provide flexible indoor and outdoor space. Outdoor facilities could utilise opportunities provided through the provision of new open spaces at the Green Loop and Brooks Park.

<sup>5</sup> Planning ref 19/02718/RE3

## Guiding principle 8: Social infrastructure

### Arts and Culture

8. Cultural infrastructure may be provided either as standalone or combined with other supporting facilities (such as food and beverage).

### Sharing economy

9. The provision of facilities to support the circular economy – such as lending libraries and re-use and repair hubs – is encouraged.



Image 10: Example of new social infrastructure and playspace

## Managing transitions through buffering and overcoming conflict

- 4.73 The transformation of Meridian Water could have implications for surrounding longstanding land uses – including the occupiers of designated Strategic Industrial Land and safeguarded waste sites within the North London Waste Plan. The guidance below will assist in overcoming potential conflicts between different activities, helping to ensure the continued effective operation of industrial businesses and the amenity of future residential occupiers within Meridian Water.
- 4.74 The following guidance builds on ELAAP to ensure that industrial estates in the wider area can continue to thrive in the context of mixed-use redevelopment within the SPD area. ELAAP (specifically Policy EL15) encourages improvements to industrial estates and intensification. This suggests that industrial neighbours will play an important role in the future of Edmonton Leaside, so adjacent uses need to be managed to overcome potential conflicts. Moreover, the London Plan seeks to ensure that development adjacent to SILs does not compromise the operation of industrial businesses, and more broadly the Agent of Change principle (Policy D13) should inform design responses to overcome potential conflicts.
- 4.75 The North London Waste Plan (2022) identified several safeguarded waste sites and three Priority Areas for New Waste Management Facilities in the vicinity of Meridian West. Development proposals should have regard to policies 1 and 2 of the NLWP where appropriate.
- 4.76 There are several heavily trafficked roads within or bordering the SPD area, namely the North Circular Road, Angel Edmonton Road and Leaside Road. The guidance below sets out means by which development can deliver adequate buffering to ensure the amenity of future residential occupiers.
- 4.77 The London Plan sets out the Agent of Change principle, which places the responsibility of mitigating the impact of any nuisances (such as noise) on the proposed new development. For the avoidance of doubt, buffering should be located on the development site rather than any adjacent SIL, LSIS or waste sites.

- 4.78 Residential occupiers to the south of the Northern Band will typically be located within the Broad Band, a mixed commercial and residential area. In the design of new homes, mitigation measures include designing residential/ mixed use developments to include appropriate screening, internal layout, soundproofing, insulation and other acoustic design measures.
- 4.79 There is scope to use elements of blue-green infrastructure as spatial buffers between potentially conflicting land uses; for example, the Green Loop in separating the Northern Band from mixed use development to the south.
- 4.80 Development must be designed to ensure that existing and future industrial uses in the Central Leaside Strategic Industrial Location (SIL) are not compromised or curtailed, including 24-hour operations and commercial HGV traffic movements. Proposals for the redevelopment of sites adjoining SIL must be accompanied by an Agent of Change Assessment
- 4.81 Sensitive lighting schemes should form an integral part of development proposals. This will be of particular relevance where development overlooks the waterways such as the Lee Navigation and open spaces such as Brooks Park and Tottenham Marshes, and where maintaining dark corridors and spaces are important for biodiversity. The Institute of Lighting Professionals (2018) [‘Bats and Artificial Lighting in the UK’](#), Guidance Note 08/18 should be used to inform development and lighting strategies.

## Guiding principle 9: Managing transitions

1. Development must consider the relationship between proposed and existing land uses and activities overcome potential conflicts, in line with the Agent of Change principle<sup>6</sup>.
2. Multi-storey employment activities (use classes B2, B8, Egiii and supporting ancillary activities) are appropriate for the Northern Band as a buffer to the North Circular Road. Premises in the northern band should be designed to transition effectively to provide residential occupiers to the south with an appropriate standard of amenity by helping to buffer noise and pollution from the North Circular Road. Buildings should provide a suitable outlook, activity and visually attractive frontage to the North Circular Road.
3. For proposed development next to Strategic Industrial Land, safeguarded waste sites and Priority Areas for New Waste Management Facilities:
  - a. Residential units must be designed to minimise the risk of disturbance arising from noise, vibration, smell, fumes, smoke, soot, ash, dust or grit, and ensure a good standard of amenity for future residents.
  - b. Access and servicing arrangements for industrial and waste-related businesses must not be impaired.
4. For proposed development next to the strategic road network (Angel Edmonton Road, Leaside Road):
  - a. Non-residential uses should be sited at ground and first floor levels. Residential uses can occupy upper floors and should be designed as dual aspect with alternative outlooks away from the industrial area.
  - b. Design of the public realm should adopt the healthy streets principles (for example including tree planting, screening, crossing arrangements, and measures to improve pedestrian safety and comfort).
  - c. Access and servicing arrangements for existing industrial businesses must not be impaired.
5. Lighting schemes should be sensitively designed to avoid light pollution, especially in the case of developments located adjacent to waterways, watercourses and open spaces.

<sup>6</sup> Set out in London Plan, specifically policy D13



## Tall buildings

- 4.82 The London Plan defines tall buildings as those that are ‘substantially taller than their surroundings...’, cause a significant change to the skyline’ and are ‘over 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey’ (London Plan paragraph 3.9.3).
- 4.83 Meridian Water benefits from a new train station, planned bus and active travel improvements and is of sufficient size to establish its own character. Therefore, in line with London Plan Policy D9, the site is generally considered a suitable location for both higher density and taller development and this is also acknowledged in the ELAAP (see paragraphs 5.11.5-5.11.8 in particular).
- 4.84 However, ELAAP Policy EL11 acknowledges that, “proposals for tall buildings...must...[be] part of an overall vision for a place, and the wider area”.
- 4.85 While policy EL11 provides some further guidance on the strategy, for example stating that tall buildings should be “located on key routes, in particular significant places or junctions” and that development adjacent to the North Circular Road should provide a buffer, this is limited. Therefore, further guidance on the spatial distribution and hierarchy of tall buildings is necessary to achieve a coherent approach.
- 4.86 Figure 4.7 and the accompanying guidance below spatially interprets the existing policy framework further, as it relates to the SPD area.
- 4.87 The height strategy is in accordance with London Plan policy D9, and policies D1, D2, D3 and GG2 parts A-C. In summary, these policies, read together and in combination with policies EL10 and EL11 of the ELAAP, support tall buildings:
- Where there is good (existing or future) public transport access; and
  - at important junctions and routes;
  - near to jobs, services and amenities, such as town centres;
  - that reinforce the spatial hierarchy of the local and wider context;
  - that provide “reference points”, which includes a point of civic or visual significance such as an important local open space.

- 4.88 In general, the indicative heights should be read as allowing 3m per residential storey, plus an additional 3m allowance added to allow for larger ground floors (e.g. where these accommodate non-residential uses) and roofs/parapets/plant.
- 4.89 The heights are recommended on a townscape and tall buildings policy basis only. Proposals above this height may be considered if other material considerations can clearly justify this (including the ability to meet other planning policy requirements and as a result of more detailed site-specific design analysis). It is noted that the Phase 1b application, currently under consideration, includes a 30-storey building.
- 4.90 Likewise, this guidance does not guarantee that buildings of the heights indicated will always be acceptable. Placement of the buildings within the identified zones will need to form a coherent and varied (including height) townscape and avoid creating a “wall” of development or overdeveloping individual sites.
- 4.91 Therefore, when assessing proposals for tall buildings, the Local Planning Authority will have regard to all other policies in the development plan, including those relating to tall building design, other design policies, residential standards and technical performance of buildings and spaces. Applicants will need to demonstrate that proposals are acceptable in all regards.
- 4.92 The guidance provided here will inform forthcoming policies in Enfield’s forthcoming Regulation 19 Local Plan.

### Guiding principle 10: Tall buildings strategy

1. Subject to further site-specific assessments, and the provision of appropriate infrastructure, the following locations and indicative heights should be explored:
  - a. A cluster of buildings up to 81m (approximately 26 residential storeys) by the station, marking the key transport node and route across the railway.
  - b. Clusters of buildings up to 69m (approximately 22 residential storeys) marking key nodes and public spaces along the Spine Road and the facilities and amenities provided in and around these spaces.
  - c. Buildings up to 57m (approximately 18 residential storeys) along the Spine Rd between key public spaces (appropriately spaced) marking the route to the Lee Valley and linking activity areas.
  - d. Buildings up to 45m (approximately 14 residential storeys) along the North Circular Road and Angel Edmonton Road to provide a buffer while responding to the scale and importance of these routes.

# Height Strategy

## Key








-  Spine Road (Indicative Location)
-  Angel Edmonton Road
-  New Bridge Indicative Location
-  New Civic Space / Activity Hub (Indicative Location)
-  New Park (Indicative)
-  Tall Building Cluster (with maximum Height Indicated)
-  Tall Buildings Permitted Along Route



Figure 4.7: Height Strategy

# Key Sites



## 5.0 High-level guidance in relation to key sites

- 5.1 The following sets out a summary of the above Guiding Principles for the key sites in the SPD area that do not currently have consent for major redevelopment. These sites are IKEA, Ravenside Retail Park, Tesco and Meridian 13 (also known as the 'Teardrop site') – please see Figure 5.1.
- 5.2 For the avoidance of doubt, the guidance in the SPD applies to all sites in the SPD area, including the Council's Phase 1 and Phase 2 developments, although for these the main parameters for development have been established through outline planning permissions.



### Key

- 1 IKEA
- 2 Ravenside Retail Park
- 3 Tesco
- 4 Meridian 13 (also known as Teardrop)
- 5 MW Phase 1
- 6 MW Phase 2

Figure 5.1: Key sites

## MW 5.1: IKEA

- Potential for high quality, mixed use redevelopment at optimal density and of exceptional design.
- Vibrant mix of uses, including main town centre uses close to the Station and Main Street. Ground floor uses could include retail, leisure and sports facilities, hospitality, food and beverage, floorspace for other commercial activities including creative and cultural industries. A solely commercial use is preferable for the northern part of the site, the Northern Band adjacent to the North Circular. Mixed commercial and residential uses are appropriate for the Broad Band.
- Suitable location for a 'strategic occupier', a large employer to act as a key anchor within Meridian Water which could include a multi-storey non-residential building. A strategic occupier would be an important placemaking element. Such an occupier could be a commercial use, or could be a cultural, creative or leisure/ sports facility.
- Commercial uses at the western end of the Broad Band/ Main Street should have a strong design presence and active frontages given the prominent location adjacent to Angel Edmonton Road and the train station.
- Proposals should ensure an increase in employment compared to the former level of circa 450 jobs and provide a variety of job opportunities.
- High quality housing of mixed tenure and size as part of a mixed-use approach that could accommodate commercial uses.
- Provision of high quality multifunctional open space, including an expanded Brooks Park, sections of the Green Loop, and naturalisation of Pymmes Brook.
- Provision of social and community facilities to support development. The site is considered an optimum location for a school.
- Road and junction improvements particularly along Angel Edmonton Road with Glover Drive/ Main Street and Leaside Road, public transport improvements, active travel infrastructure, and a high quality public realm including major public squares.
- Opportunities for building height along Main Street and Angel Edmonton Road in line with the height strategy.
- Appropriate design response to manage the interface between development and the busy Angel Edmonton Road, and industrial uses to the south of Leaside Road.
- Meanwhile use opportunities, particularly cultural and creative uses, and uses to help to evolve the town centre, providing footfall, flexible to adapt to different use requirements. Meanwhile uses should promote safety and discourage anti-social behaviour.

## MW 5.2: Ravenside Retail Park

- Optimise the use of land and seek to increase density and plot ratio. Introduction of alternative commercial uses such as industrial and logistics uses would be appropriate as part of the Northern Band. The site presents significant hurdles for residential uses.
- Locate taller commercial buildings along the North Circular to provide an amenity buffer for residential and other land uses to the south.
- Integrate with the planned urban form, in particular the consented Meridian Water 'Phase 2' development to the south<sup>7</sup>.
- A • Activate the waterside setting, and incorporate elements of the green network, including the Green Loop and Lee Navigation Linear Open Space.
- Investigate the potential to naturalise Salmons Brook and improve the riparian corridor.
- Incorporate improvements to the public realm and support better access and movement from the site to the wider area, in particular pedestrian and cycle access.
- Deliver and contribute to road and junction improvements, principally to Argon Road and public transport improvements associated with the development of the site, and active travel infrastructure.

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<sup>7</sup> Consent ref 19/02718/RE3 or any subsequent revisions.

### MW 5.3: Tesco

- Potential for high quality, mixed use redevelopment at optimal density and of exceptional design.
- Vibrant mix of uses, including main town centre uses at Main Street. Ground floor uses could include retail, leisure and sports facilities, hospitality, food and beverage, floorspace for other commercial activities including creative and cultural industries. A solely commercial use is preferable for the northern part of the site, the Northern Band adjacent to the North Circular. Mixed commercial and residential uses are appropriate for the Broad Band.
- The landowner has expressed a desire for a replacement store and continuity of trading.
- Particular attention should be paid to providing an appropriate design response and active frontages at the western end of Main Street, given its prominent location.
- Commercial uses, such as light industrial, general industrial and logistics are appropriate for the northern part of the site – the Northern Band – running parallel to the North Circular Road.
- High quality housing with of mixed tenure and size as part of a mixed-use approach that could accommodate commercial uses.
- Provision of high quality multifunctional open space, including sections of the green network including the Green Loop and naturalisation of Pymmes Brook.
- Provision of social and community facilities to support development, such as leisure and health facilities.
- Road and junction improvements particularly along Angel Edmonton Road with Glover Drive/Main Street, and link to Argon Road, public transport improvements, active travel infrastructure, high quality public realm, including 'Market Square' as a major town centre public square and hub.
- Opportunities for building height along Main Street, and on Angel Edmonton Road in line with the heights strategy.
- Appropriate response to design to manage the interface between development and the busy Angel Edmonton Road and North Circular.

### MW 5.4: Meridian 13 (also known as the Teardrop site)

- Mixed use opportunity, suitable for culture/ entertainment use as a key gateway to Meridian Water.
- A range of uses, such as workspace/studio space, educational uses, retail, cultural and community floorspace, food and beverage could be appropriate. Residential uses on upper floors could be considered, subject to design and environmental testing.
- Optimise density on the site given its location next to the train station, appropriate to the site setting and existing and proposed surroundings, opportunity here for tall buildings having regard to the tall buildings strategy.
- Exceptional design quality given its highly prominent location, addressing Angel Edmonton Road and the railway, and provide active frontage uses opening on to high quality public realm adjacent to the main road and train station. Building and public realm design should respond well to the shape of the site and its location, with the opportunity for a taller building in southern section. Development should face the station and facilitate links to the MW Phase 1 development.
- Meanwhile use opportunities should provide a positive frontage to the public realm. Meanwhile uses should promote safety and discourage anti-social behaviour.

# Infrastructure Delivery



## 6.0 Infrastructure delivery

6.1 A wide range of infrastructure requirements, including physical (transport, utilities etc), social (schools and healthcare etc) and environmental (open space, flood alleviation) are identified above. The purpose of this section is to summarise those key infrastructure requirements identified in ELAAP table 14.4 needed to deliver the scale and type of development within the Meridian West SPD area.

### Progress to date

6.2 As summarised above, redevelopment at Meridian Water is well underway, including land assembly, the opening of Meridian Water Station, full planning permission for Strategic Infrastructure Works (SIW, funded by the Government's Housing Infrastructure Fund (HIF) at £170m) and outline planning consent for the first two phases of mixed-use development, which together will deliver approximately 3,000 new homes and a range of employment, leisure, health and education uses. Meridian Water Station, which opened in June 2019, was delivered in partnership with Network Rail and is the first major infrastructure investment on the site.

6.3 The SIW will ensure the delivery of critical infrastructure which otherwise would have placed substantial abnormal costs on development in the SPD area with significant adverse implications for financial viability. The delivery of this infrastructure will help de-risk future development. The SIW package comprises the following:

- highway upgrades including the construction of an east-west link road between Glover Drive and Harbet Road (the Central Spine road, also now known as Main Street);
- the construction of four bridges across the Pymmes and Salmon Brooks and the River Lee Navigation;
- alterations (including naturalisation) to the Pymmes Brook channel, associated landscaping and formation of new public open space;
- enabling works comprising earthworks; remediation; flood conveyance channel, flood alleviation, outfall and new public open space works; and
- utilities infrastructure, including foul water drainage and a new primary electricity substation to enable development.

In addition, works funded through HIF will potentially see increased train frequency at Meridian Water station to at least 4 trains an hour over the coming years.

### Key infrastructure requirements

6.4 Table 6.1 provides a progress update on the key strategic infrastructure requirements for Meridian Water, as set out in ELAAP. These items are critical to the delivery of the vision and objectives for Meridian Water as a whole. Many of these items are funded by HIF for the SIW works and apportionment of costs is still being undertaken, so reference to cost states only 'HIF'. Other costs need to be established, and as such state 'TBC' (to be confirmed).

6.5 Table 6.2 includes a wide range of infrastructure which needs to be provided to deliver ELAAP and in some cases may be more localised and required for the delivery of individual plots or development parcels. Such infrastructure is expected to be delivered directly by developers ('development costs') or through development contributions and/or planning obligations. Events that will trigger the need for individual infrastructure items are specified where possible. These relate to the timing of development and/or the availability of funding.

6.6 The Council will work with landowners and developers to refine infrastructure requirements, particularly those identified in Table 5.2 for which costs estimates are not provided. These tables should not be treated as comprehensive, for example plot connections to mains utilities networks are not included.

### Funding and delivery mechanisms

6.7 Infrastructure funding sources are wide ranging, but generally comprise:

- Developer contributions (S106 or Community Infrastructure Levy) or direct provision by developers.
- Government grants - often through competitive bidding (e.g. HIF, TfL);
- Capital funding programmes of infrastructure providers (e.g. GLA, Local Authority, statutory utilities, DfT, DfE);
- Local Authority income (e.g. business rates, asset rationalisation, traded services); and
- Community Infrastructure Levy (CIL) is currently only charged on retail, professional services, restaurants and cafes, drinking establishments and hot food takeaways in the area covered by the SPD. However, Mayoral CIL does apply. S106 contributions play a vital role in ensuring that key infrastructure and services are provided to meet the needs arising from new development. S106 agreements will therefore be a key mechanism in securing supporting infrastructure.

6.8 A range of 'Delivery Mechanisms' may be required for specific items or types of infrastructure, ranging from informal partnerships to more formal arrangements such as Special Purpose Vehicles (SPVs) with a specific delivery scope, if/ where deemed appropriate. If required, these are likely to emerge through structured engagement/ negotiation with landowners and developers, utility providers, strategic occupiers and others.



**Table 6.1: Key ELAAP/SPD strategic infrastructure requirements**

Infrastructure Category	Project Description	Outcome	Progress	Funding	Trigger
Transport	Meridian Water Highway Infrastructure - Roads	The SIW provides for enabling strategic transport infrastructure, most significantly a new Central Spine Road (Main Street) by 2024, as well as a series of junction improvements and bridges to enhance connectivity to and within Meridian Water	The following have all secured planning permission <ul style="list-style-type: none"> <li>Leeside Road Improvements</li> <li>Glover Drive Improvements</li> <li>Flood conveyance channel Highway Works</li> <li>Central Spine Road/Main St – East and West</li> <li>Central Spine/Main St– Harbet Road Junction</li> <li>Leeside Link Road – Leeside Road Junction</li> <li>Leeside Road- Meridian Way junction improvements</li> <li>Leeside Link Road – Central Spine Road/Main St Junction</li> <li>Argon Road/ Tesco junction modification</li> </ul>	HIF	SIW planning permission
Transport	Meridian Water Highway Infrastructure - Bridges	The SIW provides for enabling strategic transport infrastructure, as well as a series of junction improvements and bridges to enhance connectivity to and within Meridian Water.	<ul style="list-style-type: none"> <li>River Lee Navigation Bridge</li> <li>Pymmes Brook North Bridge</li> <li>Salmons Brook Bridge</li> <li>Pymmes Brook South Bridge</li> <li>Relocation of Pymmes Bridge (Bailey Bridge)</li> </ul>	HIF	SIW planning permission
Transport	Borough-wide improvement of bus services focused on the Lee Valley Corridor and orbital links	Bus service improvements required for Meridian Water should be considered early, alongside the Meridian Water Highway Infrastructure Study and borough-wide service review, as well as through individual sites and the emerging new Meridian Water Masterplan.	New bus stops on Leeside Link Road, Spine Road and Glover Drive.	HIF	SIW planning permission
Transport	Upper Lee Valley transport modelling and bus priority study	Transport Strategy for Meridian Water	This study was completed summer 2017. Further work to develop Meridian Water Transport Strategy will be taken forward in parallel with wider Enfield Transport Study.	N/A	N/A
Transport	Angel Road / Meridian Water Station and Interchange Enhancements	Platform extensions, new station entrances, renaming and moving station further south, improved pedestrian links to station and formation of bus hub	Development of new three platform railway station on the Lee Valley Line completed and opened in June 2019.	HIF	Completed
Transport	West Anglia Main Line Stratford Tottenham Angel Road (STAR) Scheme	Implementation of additional track and associated signalling.	Installation of a third track to Stratford was completed with Meridian Water station in 2019.	HIF	Completed

Infrastructure Category	Project Description	Outcome	Progress	Funding	Trigger
Transport	West Anglia Main Line	Enable increased capacity and trains stopping at Meridian Water station while ensuring higher speed trains can still pass through the station seamlessly.	Installation of a new bypass at Ponders End Station and to create a bidirectional section on the mainline heading towards London.  An initial improvement in capacity will be delivered via the Greater Anglia's £1.4bn programme for the roll out of new rolling stock, expected mid-2024. All trains serving Meridian Water will be new 5-car units, with a capacity of 858 passengers per train, a 115% increase on the existing stock.	HIF  TBC, Rail Franchise Operator - Greater Anglia	Full Business Case approved March 2022.  Rail Franchise Agreement
Green and Blue Infrastructure	Edmonton Leaside – Improved access to the Lee Valley Park	Improved access to the Lee Valley Park.	Parkside Cycle Street.	HIF	SIW
Green and Blue Infrastructure	Meridian Water Flood alleviation measures	Flood alleviation measures to enable development in the Meridian Water area, to be in place ahead of development.	North Flood Conveyance Channel (NFCC) for Phase 2 flood mitigation.  Flood alleviation works to Pymmes Brook Wall.	HIF	SIW
Green and Blue Infrastructure	Edmonton Leaside – area of new open space	Brooks Park.	New Brooks Park and naturalisation of part of Pymmes Brook (adjacent to Meridian Water Phase 2).	HIF	SIW
Green and Blue Infrastructure	Meridian Water Public Realm	Demolition of building(s) along Central Spine Route.	To be delivered as part of the Strategic Infrastructure Works	HIF	SIW
Green and Blue Infrastructure	Meridian Water Public Realm	Upgrading of street.	Main Street funded by HIF, scheduled for completion by 2024/ 25.	HIF	SIW
Utilities	Meridian Water Primary Substation	Electricity provision for development from Phase 2 onwards.	Substation (21/04218/RE4) (full permission granted 2022). Construction of a primary substation together with hard and soft landscaping and associated works.  The substation is a key piece of infrastructure to ensure electrical power for the 'Phase 2' development and other development within Meridian Water and scheduled for completion by the end of 2024.	HIF	Substation planning permission and SIW

Infrastructure Category	Project Description	Outcome	Progress	Funding	Trigger
Utilities	Upper Lee Valley Decentralised Energy Network	Implementation of a sub-regional decentralised energy network to include the Alma Estate and Meridian Water	The network will be operated by Energetik, which will initially utilise a gas-fired Combined Heat and Power (CHP) plant with the intention to take very low carbon waste heat from the new Energy Recovery Facility at Edmonton EcoPark once this is operational (envisaged circa 2026). The facility will enable further 33kv supply for operators/UKPN.  The trunk main through the MW site is included within the HIF funded SIW.	LBE  HIF	SIW
Utilities	Power diversions, gas diversions, potable water, foul water	Diversions and new infrastructure to support development.	Diversions and new infrastructure such as water mains and foul sewers.	HIF	SIW
Enabling Works	Raising of ground level and remediation of contaminated ground of previous industrial sites to render them suitable for alternative land uses	Flood mitigation to enable non-water compatible ground floor uses and to remediate land to enable development.	Planning permission granted for SIW, due for completion 2024/ 25.	HIF	SIW
Public Open Space	Edmonton Marshes Earthworks and Remediation	Creation of new park/open space that also acts as flood compensation storage during extreme events.  Remediation of excavated material for reuse as land raise fill.	Planning permission granted, due for completion 2024/ 25.	HIF	SIW

**Table 6.2: Key ELAAP/SPD site-related infrastructure requirements**

Infrastructure Category	Project Description	Outcome	Progress	Funding	Trigger
Transport	Meridian Water Highway infrastructure - Roads.	Vehicular access to individual development sites and associated public realm works.	<ul style="list-style-type: none"> <li>MW Phase 1 - Secondary Street</li> <li>MW Phase 2 - Secondary Street</li> <li>Argon Link - Secondary street</li> <li>IKEA - Secondary Street (south of Glover Drive)</li> <li>Meridian Way (Gateway) road improvements</li> <li>Meridian Way / Glover Drive Gateway Junction</li> <li>Meridian Way / Leaside Road Junction modification</li> <li>Other highway improvements</li> </ul>	Development cost	Development at Sites 1-6 (see appendix for the sites)
Transport	Meridian Water to Edmonton Green direct bus link	Improved bus access; outcomes should define bus infrastructure design and how this fits into the wider bus network	Additional east-west services through Meridian Water from the A406 (444, 34)	Developer contributions	Development at Tesco, Ikea and Ravenside Retail Park. Contributions secured from Phase 1 and Phase 2.
Transport	North – South bus services	Enhanced bus service along the A1055 Corridor	Route alterations to 192 and 341. Increased frequency for 192 and 341.	Developer contributions	Implementation triggers specified within MW Phase 1 and Phase 2 S106 agreements. Any further improvements may require contributions from other development sites.
Transport	Borough-wide improvement of bus services focused on the Lee Valley Corridor and orbital links	Improved bus access at Meridian Water.	<p>Additional bus stops on Meridian Way to improve interchange with MW station/ MW Phase 1.</p> <p>Investigate extended bus routes to Meridian Water, e.g. 456 bus route stopping at North Middlesex Hospital</p>	Developer contributions	Development at Tesco and Ikea sites
Transport	Removal of access ramp from Argon Road to North Circular Road	Enabling Argon Road extension to Meridian Way and unlocking land for alternative development. Technical approval is required in advance of works.	A new link from Argon Road to Meridian Way is required to enable vehicular access to the north west the Tesco site.	Development costs	Development at Tesco site
Transport	Edmonton Leaside – Rays Road walking and cycling route	Create access and improve access to Rays Road site; create pedestrian and cycle link to Angel Road/Meridian Water Station.	Completed. This has been delivered.	N/A	N/A
Transport	West Anglia Main Line/ MW station	Improved station facilities.	Improved station facilities (e.g. platform capacity/extension).	Developer contributions, rail franchise, Government, Network Rail, other	Development at Tesco, IKEA, Ravenside and Meridian 13.

Infrastructure Category	Project Description	Outcome	Progress	Funding	Trigger
Transport	Meridian Water Public Realm	Enhanced frontage and environmental public realm improvement works.	Improvements to Angel Edmonton Road (including junctions and crossings) will be sought to reduce pedestrian severance between the station/station square Phase 1 and the rest of the MWWB SPD area, and enhance access to and from Meridian Water Station.	Developer contributions	Development at Tesco, IKEA, Ravenside and Meridian 13.
Transport	Meridian Water Active Travel Zone	Delivery of an Active Travel Zone for Meridian Water, to aid in addressing potential cross-boundary transport impacts.	Delivery of active travel routes from the SPD area to: <ol style="list-style-type: none"> <li>1. Edmonton Green;</li> <li>2. Tottenham / White Hart Lane;</li> <li>3. Tottenham Hale / High Road Tottenham / Seven Sisters; and</li> <li>4. Walthamstow.</li> </ol>	Developer contributions	Development at Sites 1 - 4
Green and Blue Infrastructure	Provide watercourse enhancements for biodiversity	Delivery of watercourse enhancements which provide increased biodiversity.	Naturalisation of Pymmes Brook north of Tesco.	Development costs	Development at Tesco site
Green and Blue Infrastructure	Meridian Water Public Realm	Enhanced frontage and environmental public realm improvement works.	An extension of Lee Navigation Linear Open Space (north of Phase 2) is sought to ensure continuous travel connections north-south through Meridian Water and providing connections with adjacent communities.  Three new public squares to be provided as part of new development. <ul style="list-style-type: none"> <li>• Station Square</li> <li>• Main Square</li> <li>• Riverside Square</li> </ul>	Development costs	Ravenside Retail Park  Development at: <ul style="list-style-type: none"> <li>• MW Phase 1</li> <li>• Tesco</li> <li>• Mw Phase 2</li> </ul>
Green and Blue Infrastructure	River Lee Navigation – western bank	Remodel a hazardous section of the bank and incorporate ecological enhancements to improve biodiversity in Phase 2.	Planned as part of future development of Meridian Water via S106 on Phase 2.	Development costs	Development at MW Phase 2

Infrastructure Category	Project Description	Outcome	Progress	Funding	Trigger
Green and Blue Infrastructure	Edmonton Leaside – area of new open space, and improved access to Lee Valley Park	Area of new open space and new active travel routes, to deliver biodiversity, open space requirements and flood attenuation.	The Green Loop would deliver multi-functional open space, biodiversity, play space, flood mitigation and active travel infrastructure. The Loop would be worked into existing planned public realm in consented schemes and should be designed into new schemes.	Development costs	Development at Phase 2 / Ikea / Tesco / Ravenside Retail Park sites
			Riverside and Salmons Brook linear open spaces (secured through Phase 2 OPA).		Secured through Phase 2 planning permission.
			Westward expansion of Brooks Park including surface water attenuation for development to the west.		Development at Ikea
			Pocket Parks		Development at Tesco/Ikea/ Ravenside sites. Secured through Phases 1 and 2 planning permission.
Green and Blue Infrastructure	Edmonton Leaside – Improved access to the Lee Valley Park	Improved access to the Lee Valley Park.	Green Loop (as above).	Development Costs	Development at Phase 2 / Ikea site / Tesco site / site / Ravenside Retail Park site
			Pedestrian and Cycle Bridges (north and south) across the Lee Navigation are required to enable direct access from Phase 2 development to open space at Edmonton Marshes.		

Infrastructure Category	Project Description	Outcome	Progress	Funding	Trigger
Social	New schools at Meridian Water	Primary school(s) and secondary school as part of development at Meridian Water development (educational needs to be determined).	Provision of school on site and contributions to schools. (the Ikea site is considered an optimal location for a school).	Development Costs / Developer Contributions / Dept for Education Capital Funds.	Development (incorporating residential) at Ikea / Tesco / Meridian 13 sites
			Early years facilities should be provided as a mix of nursery classes at local schools, children's centres and privately-run pre-schools and nursery groups.		
Social	New GP practice(s) at Meridian Water	One or more new healthcare facilities to serve the new community.	Primary health, intermediate and mental health provision will be delivered as part of a 600sq.m facility in Phase 1.	Development Costs	Development at MW Phase 1 (secured)
			Planning permission for 1300sqm in MW Phase 2 consent.	Development Costs	Development at MW Phase 2 (part of the consent)
			Further stakeholder engagement will be required with Enfield Clinical Commissioning Group and external parties, such as NHS England and the Barnet, Enfield and Haringey Mental Health NHS Trust, to establish the most appropriate type of provision. Funding will be required from developers. The facilities may be constructed as part of a mixed-use building, with other social, commercial, or retail uses, and as such could be constructed directly by developers as part of their works.	Development Costs / Developer Contributions, NHS, CCG, other	Ikea Site / Tesco Site / Meridian 13 Site
Emergency Services	Police Neighbourhood Transport Team Base / Front Counters	A base for the Police in the new community at Meridian Water.	This would take the form of a small police hub within community hub or space with Class E unit (i.e. space would be leased from developer).	Development Costs, developer contributions	Development at Ikea/ Tesco/ Meridian 13/ Ravenside Retail Park sites.
Emergency Services	Expansion of existing services	Increase in fire and ambulance service capacity to serve additional population and businesses.	Expansion of fire and rescue and ambulance services under investigation – likely to be off-site.	Developer contributions	Development at Development at Ikea / Tesco / Meridian 13 / Ravenside Retail Park sites.

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MW2 – Carbon reduction

MW3 – Blue and Green network

MW4 – Sustainable construction management

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# Strategic Environmental Assessment (SEA) final screening report and statement of determination

Meridian Water Western Bank –  
Supplementary Planning Document

April 2023

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## 1. Background

- 1.1 The London Borough of Enfield have prepared a Supplementary Planning Document (SPD) to guide the next phases of development at the western bank of Meridian Water. As part of this work, it is necessary to consider whether the Meridian Water Western Bank (MWWB) SPD should be subject to Strategic Environmental Assessment (SEA) in accordance with the relevant legislation and regulations.
- 1.2 A draft screening report was prepared in August 2021 to determine whether significant environmental effects are likely. This document is set out at Appendix A.

## 2. Consultation

- 2.1 Regulation 9 (2) (b) of Environmental Assessment of Plans and Programmes Regulations 2004 Part 2 requires consultation to be undertaken with the Environment Agency, Natural England and Historic England before making a determination.
- 2.2 The above consultation bodies were consulted in August 2021 on the draft screening report. Historic England and Natural England agreed that the MWWB SPD does not require a SEA, and the Environment Agency stated they have no comments to make.
- 2.3 Under Regulation 11 (1) the Council will send to each of the three consultation bodies a copy of the determination within 28 days of making a determination and under Regulation 11 (2).

## 3. Final screening assessment

- 3.1 To assess whether a SEA is required, the London Borough of Enfield has undertaken a screening process to determine whether the MWWB SPD is likely to have significant environmental effects.
- 3.2 The criteria for assessing the likely significance of effects in Annex II of the SEA Directive and Schedule 1 of the SEA Regulations are set out in the table below, along with consideration of the potential impact of the SPD against each criterion.
- 3.3 This screening assessment has also taken into account the Sustainability Appraisal (incorporating SEA) that has taken place on the adopted Local Plan.
- 3.4 Given the SPD does not introduce new planning policy, the SPD, alone or in combination with other plans and programmes, is not likely to have a significant effect on any European site. Therefore, it is considered that a full Appropriate Assessment under the Habitats Regulations is not required.

SEA Directive Criteria Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004	Comment	Is the SPD likely to have a significant environmental effect?
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SEA Directive Criteria Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004	Comment	Is the SPD likely to have a significant environmental effect?
<b>1. Characteristics of the Meridian Water Western Bank SPD, having particular regard to:</b>		
1(a) The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	<p>The draft SPD, if adopted, would contribute to a framework of policies and guidance for future projects and activities in the area.</p> <p>The SPD would be in conformity with national policy and the strategic policies of the Borough. The SPD will not create new policies or allocate sites for particular development or uses or address issues outside of those already assessed in the Council's Local Plan and as such is not considered to have significant effects in this regard.</p> <p>The SPD will not allocate resources.</p>	No
1(b) The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.	Whilst a material consideration in decision-making, SPDs sit at a lower level in the hierarchy of planning documents and are weighted accordingly. Providing supplementary guidance to support policies in the Development Plan (which includes the London Plan), the SPD acts to provide more detail to the priorities and principles established in higher level plans which have been subject to SEA.	No
1(c) The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.	<p>The Local Plan and other higher-level policies set the context for achieving sustainable development for which the SPD will provide further guidance as to how this should be achieved. These options will not revisit or change the higher-level policy requirements and in the case of the Core Strategy, Development Management Document and Area Action Plan, these have been subject of SA/SEA.</p> <p>The SPD will promote sustainable development in accordance with the NPPF and development plan policies.</p>	No
1(d) Environmental problems relevant to the plan or	The SPD will not introduce or exacerbate any environmental problems. Together with the development plan and other	No

SEA Directive Criteria Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004	Comment	Is the SPD likely to have a significant environmental effect?
programme.	adopted plans and guidance this SPD will add to a policy context and framework within which acceptable development proposals and associated environmental improvements can be prepared.	
1(e) The relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).	The SPD through its objectives and the encouragement of high quality and sustainable design will be indirectly relevant to the implementation of Community legislation on the environment, but not to any significant extent in the scope and nature of the localised positive outcomes envisaged, e.g. supporting improved air quality through promotion of walking/cycling, improved health and well-being through provision of green spaces/tree planting as part of redevelopment proposals.	No
<b>2. Characteristics of the effects and of the area likely to be affected, having particular regard to:</b>		
2(a) The probability, duration, frequency and reversibility of the effects.	The SPD guidance, objectives and principles are not considered to extend significantly beyond the Council's policies which have already been subject to SEA.	No
2(b) The cumulative nature of the effects.	Cumulative effects occur where the outcome of one or more policies, when put together, have a significant combined effect. The draft SPD does not allocate sites for development nor does the guidance extend significantly beyond the Council's policies which have already been subject to SEA.	No
2(c) The transboundary nature of the effects.	There are not considered to be any significant transboundary effects arising from the SPD given the highly localised nature of the area included and the types of development defined within the development plan.	No
2(d) The risks to human health or the environment (for example, due to accidents).	The SPD will not create significant risks to human health or the environment. On the contrary, there are expected to be positive outcomes, for example through the promotion of green infrastructure, well-	No

SEA Directive Criteria Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004	Comment	Is the SPD likely to have a significant environmental effect?
	being and improved public transport.	
2(e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).	The spatial extent of the SPD will not be larger than the area already covered in the development plan. The SPD guidance applies to a local area and the magnitude and spatial extent of potential effects will be limited.	No
<p>2(f) The value and vulnerability of the area likely to be affected due to:</p> <p>(i) Special natural characteristics or cultural heritage.</p> <p>(ii) Exceeded environmental quality standards or limit values.</p> <p>(iii) Intensive land-use.</p>	<p>Development plan policies relating to environmental protection and design will apply alongside the SPD. The SPD will highlight the character and assets in the area and the need for appropriate and contextual design responses.</p> <p>The extent of effects are not considered sufficient to warrant SEA.</p>	No
2(g) The effects on areas or landscapes which have a recognised national, Community or international protection status.	<p>The far east (the Lee Navigation Channel) and south-east corner of the SPD area are designated as part of the Lee Valley Regional Park, which is a Site of Metropolitan Importance for Nature Conservation.</p> <p>Approximately 1 kilometre to the north-west of the SPD area, within the Lee Valley Regional Park, is designated a Site of Special Scientific Interest (SSSI). This SSSI is known as the Chingford Reservoirs, which is designated because of their importance for wintering wildfowl and wetland birds. They are of national importance for conservation. They are of the highest priority for protection and development that would have an adverse impact on the reservoirs will not be permitted unless the needs for the development substantially outweigh the adverse impact on the site and the SSSI network as a whole.</p> <p>There are areas of international, European and national ecological importance in proximity to Edmonton Leaside, including the William Girling</p>	No



SEA Directive Criteria Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004	Comment	Is the SPD likely to have a significant environmental effect?
	<p>Reservoir which is part of the nearby Chingford Reservoirs SSSI and the Lee Valley Special Protection Area/ Ramsar site at Walthamstow Reservoirs. Epping Forest Special Area of Conservation is approximately 3 kilometres to the north-east of Meridian Water.</p> <p>The SPD supplements and provides additional guidance on the policies contained in the council's development plan which have been subjected to SA. As such, the implementation of the SPD is not expected to have significant effects the protected and important natural areas or landscapes mentioned above. Instead, it is likely that the additional guidance provided in the SPD will lead to sustainable outcomes for the Lee Valley Regional Park.</p>	

#### 4. SEA screening outcome and statement of determination

- 4.1 The Council has considered the scope and content of the draft SPD for the purposes of determining whether the guidance is likely to give rise to any significant environmental effects.
- 4.2 In making its assessment, the Council has had regard to the respective SA and SEA screening opinions that have been previously undertaken on higher level development plan documents. Particular regard has been taken to the SA for Edmonton Leaside Area Action Plan, which was produced in March 2017. The higher-level assessments note that development at Meridian Water will be taking place in an area already at serious risk of flooding. However, balanced against this is the policy requirement for flood alleviation works to mitigate risk to flood risk zones, (some of which have secured Government Funding as part of a wider package of committed Strategic Infrastructure Works) and the careful planning of major new developments at Meridian Water, which will see flood prevention measures built into the plans for new housing.
- 4.3 Based on the findings of the draft screening statement provided in Appendix A, and the outcome of consultation with relevant statutory consultation bodies, the Council has come to the view that the draft Meridian Water Western Bank SPD is unlikely to give rise to significant environmental effects. A Strategic Environmental Assessment is therefore not considered necessary.
- 4.4 The determination date is 6<sup>th</sup> April 2023.

**Appendix A: Draft SEA screening report**

**Enfield**

**Meridian Water SPD - draft SEA screening report**

**August 2021**

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



## 1. Introduction

The London Borough of Enfield are preparing a Supplementary Planning Document (SPD) to guide the next phases of development at Meridian Water. As part of this work, it is necessary to consider whether the Meridian Water SPD should be subject to Strategic Environmental Assessment (SEA) in accordance with the relevant national legislation and regulations.

A draft screening report has been prepared in order to determine whether significant environmental effects are likely. This document is set out below.

As “the responsible authority”, the London Borough of Enfield will consult the relevant bodies – the Environment Agency, Historic England and Natural England. Following this, we are required to issue a formal statement of determination and issue a final screening report.

## 2. Draft SEA screening report for Meridian Water SPD

### 2.1 Introduction

This screening report has been prepared to consider whether the Meridian Water Supplementary Planning Document (SPD) should be subject to Strategic Environmental Assessment (SEA) in accordance with the relevant national legislation and regulations.

This report outlines the legislative and policy framework for the screening, before considering whether significant environmental effects are likely to arise through the draft SPD that would require more detailed assessment.

The draft SPD is intended to establish the key objectives and principles to guide future development in the area covered. The nature and level of guidance is intended to support and complement other adopted and emerging development plan documents and policies, which have undergone equivalent and more detailed assessments in accordance with the SEA requirements of the Environmental Assessment of Plans and Programmes Regulations (2004). These development plan documents include:

- Core Strategy (2010)
- Development Management Document (2014)
- Edmonton Leaside Area Action Plan (ELAAP) (2020)

In accordance with the SEA Regulations this screening report and its conclusions will be subject to consultation with the relevant statutory bodies; the Environment Agency, Historic England and Natural England. Following this consultation, a formal statement of determination and final screening report will be published.

### 2.2 Legal Framework

SEA is a procedure that evolved in accordance with European Directive 2001/42/EC (the SEA Directive) “on the assessment of the effects of certain plans and programmes on the environment”. The SEA Directive aims to ensure a high level of protection for the environment and to integrate environmental considerations into the preparation of plans.

This has been transposed into legislation by the Environmental Assessment of Plans and Programmes Regulations (2004) (the SEA Regulations), which requires the formal environmental assessment of certain plans and programmes if they are determined to be likely to have significant effects on the environment.

Under the UK-EU Trade and Cooperation Agreement (2020), the UK has effectively taken a ‘snapshot’ of EU law, regulations and case law in relation to SEA. This has the effect of retaining the existing EU framework post-Brexit.

The National Planning Policy Framework (NPPF) defines an SPD as a document which adds further detail to the policies in a development plan and can be used to provide further guidance for development on specific sites, or on particular issues, such as design. SPDs are capable of being a material consideration in planning decisions but are not part of the development plan. Also, they should not add unnecessarily to the financial burdens on development.

National Planning Practice Guidance states that whilst SPDs do not require Sustainability Appraisal (SA), they may in exceptional circumstances require a SEA if they are assessed to

be likely to have significant environmental effects, that have not already have been assessed during the preparation of the relevant strategic policies. The guidance goes on to state SEA is unlikely to be required where an SPD deals only with a small area at a local level, unless it is considered that there are likely to be significant environmental effects.

In order to determine whether significant environment effects are likely, the local planning authority (London Borough of Enfield) as “the responsible authority” need to take the criteria specified in Schedule 1 to the SEA Regulations into account (reflecting Annex II of the SEA Directive) and consult the relevant bodies – the Environment Agency, Historic England and Natural England.

The preliminary outcome of Enfield’s SEA screening process is detailed further in this report.

### 2.3 Purpose of the Meridian Water SPD

Meridian Water is the Borough’s largest residential led mixed-use development and lies within the Edmonton Leaside Strategic Growth Area, offering major opportunities for regeneration and improvement.

The area that will be covered by the SPD is set out below in Figure 1



Figure 1: Red line boundary for SPD

The SPD will build upon and provide more detailed guidance on policies in the development plan, including ELAAP and the Local Plan. It will provide clear planning guidance for the sustainable regeneration of Meridian Water and provide guidance on how policy will be implemented spatially. This will help ensure that emerging developments are planned and

designed in a coherent and integrated manner and can deliver identified priorities, such as a high-quality mixed-use environment, a more connected and accessible place, and sufficient infrastructure.

The SPD will set out the guiding principles and parameters for the area to ensure the vision for a sustainable high-quality development is achieved. It will provide guidance on public realm, streets and connectivity, urban grain, land use, and sustainable design, by setting out the Council's application of planning policy. The SPD will also set out the infrastructure required to support the delivery of good growth at Meridian Water.

The guidance will not introduce new planning policies into the development plan; however, it will become a material consideration in decision-making. In doing so, it will comply with the development plan.

#### 2.4 Determining the likely significance of effects on the environment

To assess whether a SEA is required, the London Borough of Enfield must undertake a screening process to determine whether the Meridian Water SPD is likely to have significant environmental effects.

The criteria for assessing the likely significance of effects in Annex II of the SEA Directive and Schedule 1 of the SEA Regulations are set out in the table below, along with consideration of the potential impact of the SPD against each criterion.

This screening assessment has also taken into account the Sustainability Appraisal (incorporating SEA) that has taken place on the adopted Local Plan.

Given the SPD does not introduce new planning policy, the SPD, alone or in combination with other plans and programmes, is not likely to have a significant effect on any European site. Therefore, it is considered that a full Appropriate Assessment under the Habitats Regulations is not required.

SEA Directive Criteria Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004	Comment	Is the SPD likely to have a significant environmental effect?
<b>1. Characteristics of the Meridian Water SPD, having particular regard to:</b>		
1(a) The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	<p>The draft SPD, if adopted, would contribute to a framework of policies and guidance for future projects and activities in the area.</p> <p>The SPD would be in conformity with national policy and the strategic policies of the Borough. The SPD will not create new policies or allocate sites for particular development or uses or address issues outside of those already assessed in the Council's Local Plan and as such is not considered to have</p>	No

<b>SEA Directive Criteria Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004</b>	<b>Comment</b>	<b>Is the SPD likely to have a significant environmental effect?</b>
	<p>significant effects in this regard.</p> <p>The SPD will not allocate resources.</p>	
<p>1(b) The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.</p>	<p>Whilst a material consideration in decision-making, SPDs sit at a lower level in the hierarchy of planning documents and are weighted accordingly. Providing supplementary guidance to support policies in the Development Plan (which includes the London Plan), the SPD acts to provide more detail to the priorities and principles established in higher level plans which have been subject to SEA.</p>	No
<p>1(c) The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.</p>	<p>The Local Plan and other higher-level policies set the context for achieving sustainable development for which the SPD will provide further guidance as to how this should be achieved. These options will not revisit or change the higher-level policy requirements and in the case of the Core Strategy, Development Management Document and Area Action Plan, these have been subject of SA/SEA.</p> <p>The SPD will promote sustainable development in accordance with the NPPF and development plan policies.</p>	No
<p>1(d) Environmental problems relevant to the plan or programme.</p>	<p>The SPD will not introduce or exacerbate any environmental problems. Together with the development plan and other adopted plans and guidance this SPD will add to a policy context and framework within which acceptable development proposals and associated environmental improvements can be prepared.</p>	No
<p>1(e) The relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).</p>	<p>The SPD through its objectives and the encouragement of high quality and sustainable design will be indirectly relevant to the implementation of Community legislation on the environment, but not to any significant extent in the scope and nature of the localised positive outcomes envisaged, e.g. supporting improved air quality through promotion of walking/cycling, improved health and well-being through provision of</p>	No

SEA Directive Criteria Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004	Comment	Is the SPD likely to have a significant environmental effect?
	green spaces/tree planting as part of redevelopment proposals.	
<b>2. Characteristics of the effects and of the area likely to be affected, having particular regard to:</b>		
2(a) The probability, duration, frequency and reversibility of the effects.	The SPD guidance, objectives and principles are not considered to extend significantly beyond the Council's policies which have already been subject to SEA.	No
2(b) The cumulative nature of the effects.	Cumulative effects occur where the outcome of one or more policies, when put together, have a significant combined effect. The draft SPD does not allocate sites for development nor does the guidance extend significantly beyond the Council's policies which have already been subject to SEA.	No
2(c) The transboundary nature of the effects.	There are not considered to be any significant transboundary effects arising from the SPD given the highly localised nature of the area included and the types of development defined within the development plan.	No
2(d) The risks to human health or the environment (for example, due to accidents).	The SPD will not create significant risks to human health or the environment. On the contrary, there are expected to be positive outcomes, for example through the promotion of green infrastructure, well-being and improved public transport.	No
2(e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).	The spatial extent of the SPD will not be larger than the area already covered in the development plan. The SPD guidance applies to a local area and the magnitude and spatial extent of potential effects will be limited.	No
2(f) The value and vulnerability of the area likely to be affected due to:  (i) Special natural characteristics or	Development plan policies relating to environmental protection and design will apply alongside the SPD. The SPD will highlight the character and assets in the area and the need for appropriate and contextual	No



SEA Directive Criteria Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004	Comment	Is the SPD likely to have a significant environmental effect?
<p>cultural heritage.</p> <p>(ii) Exceeded environmental quality standards or limit values.</p> <p>(iii) Intensive land-use.</p>	<p>design responses.</p> <p>The extent of effects are not considered sufficient to warrant SEA.</p>	
<p>2(g) The effects on areas or landscapes which have a recognised national, Community or international protection status.</p>	<p>The far east (the Lee Navigation Channel) and south-east corner of the SPD area are designated as part of the Lee Valley Regional Park, which is a Site of Metropolitan Importance for Nature Conservation.</p> <p>Approximately 1 kilometre to the north-west of the SPD area, within the Lee Valley Regional Park, is designated a Site of Special Scientific Interest (SSSI). This SSSI is known as the Chingford Reservoirs, which is designated because of their importance for wintering wildfowl and wetland birds. They are of national importance for conservation. They are of the highest priority for protection and development that would have an adverse impact on the reservoirs will not be permitted unless the needs for the development substantially outweigh the adverse impact on the site and the SSSI network as a whole.</p> <p>There are areas of international, European and national ecological importance in proximity to Edmonton Leaside, including the William Girling Reservoir which is part of the nearby Chingford Reservoirs SSSI and the Lee Valley Special Protection Area/ Ramsar site at Walthamstow Reservoirs. Epping Forest Special Area of Conservation is approximately 3 kilometres to the north-east of Meridian Water.</p> <p>The SPD supplements and provides additional guidance on the policies contained in the council's development plan which have been subjected to SA. As such, the implementation of the SPD is not expected to have significant effects the protected and important natural areas or landscapes mentioned above. Instead, it is likely that the additional guidance provided in the SPD will lead to sustainable outcomes for the Lee Valley</p>	<p>No</p>

SEA Directive Criteria Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004	Comment	Is the SPD likely to have a significant environmental effect?
	Regional Park.	

## 2.5 Preliminary SEA Screening Outcome

The Council has considered the scope and content of the draft SPD for the purposes of determining whether the guidance is likely to give rise to any significant environmental effects.

In making its assessment, the Council has had regard to the respective SA and SEA screening opinions that have been previously undertaken on higher level development plan documents. Particular regard has been taken to the SA for Edmonton Leaside Area Action Plan, which was produced recently in March 2017. The higher-level assessments note that development at Meridian Water will be taking place in an area already at serious risk of flooding. However, balanced against this is the policy requirement for flood alleviation works to mitigate risk to flood risk zones, (some of which have secured Government Funding as part of a wider package of committed Strategic Infrastructure Works) and the careful planning of major new developments at Meridian Water, which will see flood prevention measures built into the plans for new housing.

Based on the findings of the draft screening statement provided above, and subject to the views of the relevant statutory consultation bodies, the Council has come to the preliminary view that the draft Meridian Water SPD is unlikely to give rise to significant environmental effects. A Strategic Environmental Assessment is therefore not considered necessary at this stage.

### **3. Next steps**

The Council will consult with the relevant bodies (Environment Agency, Historic England and Natural England) on the preliminary screening assessment outcome, as per the SEA Regulations.

Consultation responses will be considered, and the screening determination updated as appropriate. If, as a result of this consultation, a SEA is found to be required, the preparation can be integrated into the process of revising the draft Meridian Water SPD and in producing the final SPD to be adopted following further assessment and necessary changes.

If the outcome of this screening confirms that SEA is not necessary, in accordance with Regulations, a formal statement of determination and final screening report will be published to demonstrate that SEA issues have been taken into account and considered during the preparation of the SPD.

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# Meridian West – Supplementary Planning Document

Consultation Statement

May 2023

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## 1.0 Introduction

- 1.1 This statement sets out an account of the Meridian West Supplementary Planning Document (SPD) consultation. Consultation was undertaken in accordance with the Council's Statement of Community Involvement and the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2 The statement firstly provides an overview of the consultation actions undertaken by the Council, before setting out who responded to the consultation and the number of responses received. A summary of the main issues raised by consultees is then provided.
- 1.3 Appendix A sets out a comprehensive account of all the points made by representors and the Council's response (i.e. how the issues have been taken account of in revision the draft SPD).

## 2.0 Summary of the consultation

2.1 This section sets out the main steps undertaken by the council as part of the consultation on the Meridian West SPD.

### Pre-consultation phase

2.2 Prior to formal consultation, the Council undertook a series of pre-consultation engagement sessions with key stakeholders. The main purpose of these sessions was to make stakeholders aware that preparation of an SPD was in train, and to take on board their preliminary views and perspectives as the SPD was being prepared.

2.3 The following sessions were held throughout 2022:

- Adjoining boroughs, the GLA and TfL, 6<sup>th</sup> May 2021 and 17<sup>th</sup> June 2022
- Lee Valley Regional Park Authority, 26<sup>th</sup> May 2022
- Canal and River Trust, 31<sup>st</sup> May 2022
- Environment Agency, 1<sup>st</sup> July 2022
- Thames Water, 9<sup>th</sup> September 2022
- Natural England, 9<sup>th</sup> September 2022

2.4 Meetings with landowners, led by the council as site promoter, were also held in early 2022.

### Formal consultation phase

2.5 Enfield Council's Cabinet approved the Meridian West SPD for public consultation on 12th October 2022.

2.6 Cabinet also agreed to delegate authority to the Director of Planning and Growth to agree the timing of the public consultation. It was agreed that consultation should take place for six weeks – exceeding the statutory minimum of four weeks.

2.7 Consultation commenced on 9th November 2022 and ran until 11:59 on 14th December 2022.

2.8 Email notifications were sent to organisations and persons on the Council's planning policy mailing list. The list comprises individuals who have previously expressed an interest in being kept notified of planning policy consultations. This included a good range of specific and general consultation bodies, as defined in the Town and Country Planning (Local Planning) (England) Regulations 2012.

2.9 In order to reach community groups in the vicinity of Meridian Water, a further email notification was made to community groups active in the south east of the borough, drawing on contacts held within the Council. 94 groups were contacted to alert them to the consultation.

2.10 A dedicated webpage was set up at [www.enfield.gov.uk/mwwbspd](http://www.enfield.gov.uk/mwwbspd) to host a pdf of the draft SPD and to inform interested parties of the consultation.



- 2.11 A press advertisement was placed in the Enfield Independent, notifying residents of the consultation. In addition, a media release was issued to local and specialist newspapers. This resulted in in-depth coverage in Avrupa and Parikiaki.
- 2.12 The consultation was publicised on the Council's social media channels (including Twitter and Facebook).
- 2.13 The Council's 'Have Your Say' platform was used to publicise the consultation, with a dedicated page setting out the aims and scope of the SPD, and ways to get involved.
- 2.14 To ensure that digitally excluded residents were not left out, hard copies were placed in the Council's Silver Street reception, and at nearby libraries at Fore Street and Edmonton Green.
- 2.15 Two drop-in sessions were held to give residents and interested parties the opportunity to find out more about the SPD and to pose questions to Council officers. The drop-in sessions were held at Fore Street Library (approximately 850m from the Meridian West area) on:
  - 10am to 1pm, Tuesday 15th November
  - 4pm to 7pm, Monday 28th November
- 2.16 An outline of the range of issues raised at the drop-in sessions is provided in the next section.
- 2.17 In addition to extensive external promotional efforts, the SPD consultation was publicised internally to council staff via an email to Directors and Heads of Service, the Members' Newsletter, and emails to local ward Councillors.
- 2.18 Two ways of responding were publicised – by email to [localplan@enfield.gov.uk](mailto:localplan@enfield.gov.uk) and by post.
- 2.19 During the formal consultation period meetings were offered to key stakeholders to discuss the substantive content of the SPD and potential issues raised by proposed guidance. This offer was taken up by the GLA/ TfL (1st December 2022) and the Canal and River Trust (7th December 2022).

### 3.0 Who responded?

3.1 A total of 20 representations were received from a range of 19 organisations and one individual. These are as follows:

- Hadley Wood Neighbourhood Planning Forum
- Coal Authority
- Colin Saunders
- Better Streets for Enfield
- National Highways
- Thames Water
- Metropolitan Police Service
- Sport England
- Metropolitan Police Service – designing out crime
- Goodman
- Tesco
- Prologis
- IKEA
- Haringey
- Environment Agency
- Canal and River Trust
- Swifts Local Network – Swifts and Planning Group (London)
- GLA
- Lee Valley Regional Park Authority

3.2 A full schedule of the representations received including officer responses can be found on the council's website. This shows how officers have addressed each comment received and outlines the changes which have been proposed.

3.3 Follow-up meetings were held on request with Prologis (10th January 2023), LB Haringey (20th January 2023), and the GLA (31st January 2023). The meetings were held to clarify issues raised in their respective representations and to discuss proposed changes to the SPD.

## 4.0 Summary of the main issues raised

- 4.1 Positivity and general support – many responses expressed support for the intentions, aims and ambitions of the SPD. This support was expressed from all quarters – including ‘statutory’ consultees (such as National Highways and Canal and River Trust), landowners (Prologis), and the GLA.
- 4.2 Infrastructure – several have raised issues with the way that the SPD deals with infrastructure.
- The issue of apportionment was raised – IKEA argued that funding for any school should be proportionate to the needs generated by the redevelopment of the IKEA site, and other funding apportioned from other developments. Similar points were raised by IKEA with regards to the provision of bridges and the green loop.
  - Related to this, several landowners have queried why they should be required to accommodate specific pieces of infrastructure on their sites. Prologis have raised issues with aspects of the Green Loop and River Lee Navigation Open Space on their site, and IKEA have raised issues with their site being identified as an ‘optimum location’ for a school.
  - The issue of infrastructure costings and implications for viability was raised by IKEA. They also expressed a desire for a fully costed infrastructure plan.
- 4.3 Tall buildings – the GLA argue that the proper place for this content is within a DPD rather than an SPD. Other respondents also shared views on this point – IKEA argue that the wording as it stands is over prescriptive, Hadley Wood Neighbourhood Planning Forum argue that the wording is not prescriptive enough. The Canal and River Trust argued for an ‘area 3,’ stepping heights down to meet the River Lee Navigation, while LVRPA make a similar point, arguing for a considerable reduction in heights along the boundary with the Regional Park
- 4.4 Strategic occupier – IKEA stressed that the presence of a strategic occupier should not be a precondition for redevelopment of the site and argue for flexibility in terms of location.
- 4.5 Cross boundary transport impacts – Haringey have requested request that transport and highways impact on Haringey is properly identified within the SPD and that the list of infrastructure requirements to support delivery is broadened, specifically to include requirements to address identified impacts on Haringey.
- 4.6 Ongoing engagement – several have expressed an interest in remaining engaged in upcoming development proposals. LB Haringey would like to maintain engagement on the development of specific sites, improvements to Leaside Road, and planning for the new local centre. The Metropolitan Police Service would like to be involved in the location and timescale for delivery of the anticipated police base at Meridian Water. Thames Water would like to continue discussions on the scale and phasing of development. Canal and River Trust expressed an interest in early engagement on all development proposals adjacent, or close to the River Lee Navigation. Similarly, the Lee Valley Regional Park requested ongoing involvement with regards to green and blue infrastructure, bridge links and pedestrian and cycle routes that will connect the SPD area with the Regional Park.

## **5.0 Conclusions and next steps**

- 5.1 The draft SPD has been amended in line with consultation comments. Each comment received and the Council's response is set out in Appendix A.
- 5.2 Cabinet approval for adoption of the amended SPD will be sought in June 2023.

## Appendix A: Representations made and the Council's response

Repres entor ID	Name/ organisation	Nature of response	Relevant section	Relevant section/ guiding principle	Comment	Officers' analysis
1	Hadley Wood Neighbourhood Planning Forum	Comment	1.4	Introduction	States that the document does not introduce new planning policies, however, it then continues to say that "it will be a material consideration in decision making". The document contains mostly broad, high level statements that are light on details, which give the Planning Officers too much scope for interpretation.	As an SPD, the document will provide further detail and guidance to the existing policy framework. It cannot be overly prescriptive (for example, allocating sites for specific uses) or introduce new policy. Decisions will be made in line with the adopted development plan, mindful of material considerations including the SPD (if adopted).
1	Hadley Wood Neighbourhood Planning Forum	Comment	3	Vision	The Vision is another good example of the lack of details, as the wording would apply to any major development/regeneration scheme. It is also worth noting that the Vision doesn't reference the eight principles that are listed in the June 2022 Meridian Water Vision document.	The June 2022 Vision is a corporate rather than a planning document. There is alignment between the SPD and corporate Vision document.

1	Hadley Wood Neighbourhood Planning Forum	Comment	3.1	Objectives	Mentions the objective to deliver “around 5,000” homes, which is inconsistent with the above mentioned Meridian Water Vision document, which states that 10K homes will be created over the course of the 25 year development.	The 5k homes figure was established by the Core Strategy and ELAAP. As these documents form part of the adopted development plan, the SPD aligns with this. The 10k homes figure is a corporate aspiration which encompasses sites outside the SPD boundary.
1	Hadley Wood Neighbourhood Planning Forum	Comment	3.1	Objectives	Since the ELAAP adoption IKEA have closed down their store and the site is for sale and the 5,000 homes should be increased, with specific milestones/targets. The SPD lacks details.	Any change to the 5k homes figure would need to be dealt with through a DPD rather than an SPD.
1	Hadley Wood Neighbourhood Planning Forum	Comment	3.1	Objectives	The SPD must provide clear guidance how the promised 10,000 new homes will be provided over the next 25 years.	The SPD provides guidance on the delivery of 5k homes.
1	Hadley Wood Neighbourhood Planning Forum	Comment	4	Guiding principle 1: Movement and connectivity	Cars are given the lowest priority, however, the site is currently a PTAL 0-1 and to simply build housing without adequate parking will result in illegal and inconsiderate parking, not reduce private car usage. Alternative modes of transport must be available before the housing is occupied, just as schooling and	The SPD, in line with the London Plan and ELAAP, seeks to encourage active travel and discourage use of the private cars. The SPD supports the delivery of sustainable transport infrastructure. The major schemes that have been approved to date (Phase 1 and Phase 2) have been assessed against London Plan parking standards and provision is

					healthcare must precede it.	required in accordance with those standards. Both schemes are required to provide public transport improvements as part of S106 requirements.
1	Hadley Wood Neighbourhood Planning Forum	Comment	4	Guiding principle 3: Blue and green infrastructure network	Protection of existing trees should be an explicit aim, with replacement of trees lost due to development a requirement. We would suggest that replacement on a 2-for-1 basis would be appropriate.	There are few existing trees on site, additional supporting text included to require the replacement of any existing trees to be lost (para 4.27)
1	Hadley Wood Neighbourhood Planning Forum	Comment	4	Guiding principle 7: Delivering a new town centre	It is unclear what “town centre activities” comprises, and how the “acceptable uses” will be safeguarded when the General Permitted Development Order allows change of use from, for example, retail to residential or from restaurants to offices.	Main town centre activities are defined in the NPPF. It is outside the remit of the SPD to rescind rights granted by the government through the GDPO. Guiding Principle 7 (part 1) builds on the main town centre uses set out in the NPPF to outline the desired uses, activities and role of the centre.

1	Hadley Wood Neighbourhood Planning Forum	Comment	4	Guiding principle 8: Social infrastructure	Place markers for facilities such as schools, health centres, shopping and leisure should be part of the strategic plan for a development project of this scale. The ELAAP noted that 5,000 homes would require 2 primary schools and 1 secondary school and the location of those should have been established at the outset, not a decade into the project. It is also inappropriate for the SPD to state that “the IKEA site presents an optimal location for a school” without the agreement of the landowner or a compulsory purchase order.	Site allocations must be dealt with through DPDs rather than SPDs, through it is within the remit of SPDs to identify optimal locations for uses. For sites which are subject to extant planning consents, several social infrastructure items have been secured (such as a health centre in Phase 1 and a school in Phase 2).
1	Hadley Wood Neighbourhood Planning Forum	Comment	4.7	Guiding principle 10: Tall building definition and height strategy	The comment that “the London Plan defines ‘tall’ building as over 6 storeys” is incorrect. London Plan Policy D9 A states that tall buildings “should not be less than 6 storeys”, i.e. 6 storeys would be a tall building. Figure 4.6 rightly notes that roof plant and taller ground floors affect the number of floors vs height and it would be preferable to exclusively link the threshold to the height from ground level to the top of the building (i.e. 21m).	London Plan policy D6 states that “tall” is defined as buildings that are not less than 6 storeys <u>or</u> 18 metres measured from ground to the floor level of the uppermost storey.



1			4.7	Guiding principle 10: Tall building definition and height strategy	The reasoning appears to be that, as the London Plan requires locations for tall buildings (over 21m) to be identified, all other locations can build up to 21m height. London Plan para 3.9.3 states that it is not automatically acceptable for any building to be up to the height threshold for tall buildings, and that buildings must not lead to unacceptable impacts on the area. Furthermore, there is nothing to stop boroughs from setting a lower default height level, as, for example, the London Borough of Bexley has done by applying 15m max height where taller buildings are not deemed appropriate. The 21m max height should be worded as a deliberate choice for this particular location, not the borough's default level.	This implication is not present in the reasoning. 21m is not indicated as a default height.
1	Hadley Wood Neighbourhood Planning Forum	Comment	4.75	Guiding principle 10: Tall building definition and height strategy	This paragraph undermines the entire maximum height concept and is unacceptable, as it allows planning officers to approve any height any location.	Any decision will be taken in accordance with the development plan, mindful of material considerations such as the tall buildings and height guidance provided in the SPD (if adopted).

1	Hadley Wood Neighbourhood Planning Forum	Comment	4.76	Guiding principle 10: Tall building definition and height strategy	The comment that the placement of buildings must both “form a coherent and varied (including height) townscape” gives planning officers total freedom to approve whatever they want - several tall buildings alongside each other will be deemed “coherent”, while a single tall building next to 2 storey houses will be judged “varied” height. The wording must be amended to provide protection against overbearing buildings being erected near lower dwellings, such as single family houses.	Coherent and varied are not mutually exclusive. Many valued and cherished townscapes feature a variety of buildings within an overarching theme. Protection for the amenity enjoyed by residents of existing lower buildings is provided by the adopted development plan. Former paragraph 4.76 has been deleted.
1	Hadley Wood Neighbourhood Planning Forum	Comment	5	High-level guidance in relation to key sites	The comments on the various sites are of little use, as it is another example of broad, high level statements and the aim for every site is said to be high quality mixed use redevelopment. The document should also make it clear what the landowners’ intentions are.	The high-level guidance is intended to summarise the relevant parts of the SPD which apply to specific sites. Several landowners have responded to the SPD consultation, and their comments have fed into the final SPD.
1	Hadley Wood Neighbourhood Planning Forum	Comment	6.7	Infrastructure delivery	The document must detail the extent to which CIL from other parts of the borough will be used to finance this project.	CIL arrangements are set out in the adopted development plan and associated SPD.

2	The Coal Authority	Comment	General	General	Enfield Council lies outside the defined coalfield and therefore the Coal Authority has no specific comments to make on any stages of your Local Plan; SPDs etc.	Noted.
3	Colin Saunders	Comment	General	General	It is vital that the brooks walking trails are embodied in the plans and should be added to the planning maps. It is anticipated that further route improvements may become possible in due course as more of the brooks is opened up in the future.	Included as part of GP3 supporting text.
3	Colin Saunders	Comment	General	General	Provision should be made for Pymmes Brook and Salmons Brook trail signs to be relocated to the new routes within Meridian Water when they become available.	Included as part of GP3 supporting text
3	Colin Saunders	Comment	General	General	Provision should also be made for refreshment facilities and public toilets.	Included as part of GP3 supporting text. Refreshment facilities will be provided as part of a comprehensive mixed-use redevelopment. Public toilet provision is addressed by London Plan Policy S6.

4	Better Streets for Enfield	Support	4	Guiding principle 1: Movement and connectivity	Following active travel principles while jammed up against the north circular has its challenges. The intention to connect up with recent infrastructure, like the diagonal cycle path in Edmonton is very welcome.	Noted.
4	Better Streets for Enfield	Comment	4	Guiding principle 1: Movement and connectivity	The dedicated train station will clearly help but east/west has its challenges like anywhere else. It would be good to know a little more about which bus routes will run through or nearby the area, and if they are either new or extensions of existing routes? Apologies if in the detail but I couldn't see it. In particular it would be good to know about east/west routes. The 456 bus route is new and it could be an easy win to connect to it.	Additional information on bus provision added to GP1 supporting text and chapter 6.
4	Better Streets for Enfield	Comment	4	Guiding principle 1: Movement and connectivity	The main request is about specifics. For example How many spaces for car parking will exist? or What is the intended proportion of journeys taken active travel or public transport? I understand why planners may be reluctant to commit to hard numbers but stating some aims would be helpful. It feels as though so much time and effort has gone into this design that there is	The specific details of delivery will be dealt with through the DM process, with decisions taken in line with the adopted development plan and material considerations such as the guidance within the MW SPD (if adopted).

					scope for it to be a model for others to follow.	
5	National Highways	Support	3.1	Objectives	We welcome the aims of the SPD which are to deliver sustainable development with sustainable connections to the wider area. In particular, we support objective number 3, which aims to improve bus, rail and active travel connectivity for the area. This is a necessary component, alongside reductions in vehicle parking at source, for reducing overall traffic levels using the strategic network.	Noted.
6	Thames Water	Comment	4	General	We consider that the SPD should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development proposed in a policy. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are	This issue is dealt with by Core Strategy Policy 21 and ELAAP 5.12.9, as well as London Plan Policy SI5.

					regulated and plan in 5 year periods (Asset Management Plans or AMPs).	
6	Thames Water	Comment	4	General	<p>We recommend the SPD include the following policy/supporting text:</p> <p><b>PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT</b></p> <p>“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”</p> <p>“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a</p>	See above. This wording already forms part of ELAAP 5.12.9.

					capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”	
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6	Thames Water	Comment	4		It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.	This requirement is referenced in DMD 58 and the use of planning obligations to require adherence is stated in London Plan Policy SI5.
6	Thames Water	Comment	4	General	Proposed policy text: “Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the ‘Fittings Approach’ in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to	See above.



					new residential development to ensure that the water efficiency standards are met.”	
6	Thames Water	Comment	4	General	With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan “It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”	Suggested wording included as part of 4.34.

6	Thames Water	Comment	3.1	Vision	<p>The Edmonton Marshes to the east of the Western Bank Area of Meridian Water are shown as flood risk mitigation and open space. The majority of this site was compulsorily purchased from Thames Water. The area contains strategic underground infrastructure including strategic water mains and sewers. The sale agreement contains protective provisions to protect these strategic underground infrastructure. It is considered that it would be helpful to make reference to the need to protect this strategic underground infrastructure in the SPD and any supporting documents.</p>	<p>The area in question is outside the SPD area. As the protective provisions are contained within the sale agreement there is no need to repeat these in the SPD.</p>
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6	Thames Water	Comment	Figures 2.1, 2.2, 3.1	Figures 2.1 Meridian West SPD area and its surroundings, 2.2 Constraints and Opportunities & 3.1 Vision and Objectives: Thames Water Land to South of William Girling Reservoir	<p>The Thames Water land to south of William Girling Reservoir is shown shaded green on figures 2.2 and 3.1 as 'Existing Open Space' which is incorrect and should be amended. The site is not currently a green space, nor is it publicly accessible. The site's current lawful use is as a waste site and is previously developed land. The site is in operational use for waste recycling and includes large mounds of recycling material and associated buildings and roads. The southern part of the site is currently being used by North London Waste Authority as contractors depot as part of the Development Consent for the North London Heat and Power Project.</p> <p>The green shading on the Thames Water site to south of William Girling Reservoir (to north of north circular) should therefore be removed.</p>	Noted. The site is not a designated open space, figures amended as suggested.
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6	Thames Water	Comment	General	General	<p>The level of information contained in the draft SPD does not enable Thames Water to make an assessment of the impact the proposed development will have on the water supply and waste water/sewerage network infrastructure and water/sewage treatment works. To enable us to provide more specific comments we require details of the type and scale of development together with the anticipated phasing. It would therefore be helpful to continue the engagement and have ongoing discussions with the Enfield Council project lead in this respect.</p>	<p>Noted. Discussions are ongoing and will continue.</p>
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7	Metropolitan Police Service	Comment	6.2	<p>Table entry: Emergency Services Police Neighbourhood Transport Team Base / Front Counters: A base for the Police in the new community at Meridian Water.</p>	<p>MPS welcomes the acknowledgement of the need for contributions towards policing infrastructure, including a local police base. This is an approach also adopted at other similar large scale developments.</p> <p>MPS has a requirement for a 150 sqm police base within the development. In order for this to be affordable to occupy, MPS requests that the SPD makes clear that the space would be provided at a peppercorn rent. If MPS is offered space at commercial rents, this is unlikely to be viable. In addition, experience elsewhere has shown that developments must fund the cost of fitting out the space if delivery is to be affordable. The fit out cost is estimated to be £750,000, based on section 106 discussions ongoing regarding delivery of a similar base in another London borough. We believe that the SPD should refer to these issues, as they are of key importance in ensuring that a police base is deliverable.</p> <p>MPS would be keen to discuss at the appropriate time the most appropriate location within the development for the policing base. MPS is keen on locations with</p>	<p>Detailed considerations (such as location and phasing) will be decided through the development management process.</p>
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					<p>visibility.</p> <p>MPS is also keen to discuss the phasing further. We understand that the proposed phasing of delivery for the police base and associated contributions is very broad and believe that it would be helpful to narrow this down. The SPD states that planning permission has already been granted for 3,025 homes, but the phasing for the police base seems to leave delivery timescales open up as far as potentially 2032. We believe that a more specific timescale should be stated, acknowledging that a substantial amount of development is already consented at the site and requires policing infrastructure.</p> <p>We also note that MPS has a charging methodology for other policing infrastructure required to support the development. This is referred to within the attached 2021 Local Plan representations. We believe that this should be acknowledged within the draft SPD. This approach to S106 charging is widely used by Police and Crime Commissioners and has been proven to meet the relevant procedural tests at appeal and in the high court.</p>	
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7	Metropolitan Police Service	Comment	7.2	<p>Table entry: Emergency Services Police Neighbourhood Transport Team Base / Front Counters: A base for the Police in the new community at Meridian Water.</p>	<p>We suggest that Table 6.2 of the document is revised as follows:  Infrastructure Category: Emergency Services Police Neighbourhood Transport Team Base / Front Counters  Project Description: A base for the Police in the new community at Meridian Water and associated s106 policing infrastructure contributions.  Outcome: This would take the form of a 150 sqm police hub within community hub or space with Class E unit. The space would be provided at peppercorn rent and the fit out cost covered by the developer(s).  Funding: Development Costs, developer contributions  Trigger: At the early stages of development at Ikea/ Tesco/ Teardrop/ Ravenside Retail Park sites.</p>	<p>Detailed considerations (such as location and phasing) will be decided through the development management process.</p>
8	Sport England	Support	4	<p>Guiding principle 8: Social infrastructure</p>	<p>Sport England welcomes that new sport facilities would be sought within the area. This is especially important given that existing sport facilities within the area may not be able to accommodate the increased demand generated by the planned growth within the area without exacerbating existing and/or</p>	<p>Noted.</p>

					predicted future deficiencies.	
8	Sport England	Comment	4	Guiding principle 8: Social infrastructure	The type, amount and mix of facilities, however, should be informed by a robust evidence base such as the Council's Playing Pitch Strategy and any robust and up-to-date strategy relating to indoor/built sport facilities. Sport England recommends that Guiding Principle 8: Social infrastructure, MW 5.1: IKEA and MW 5.3: Tesco recognise the need for any new sports facility to be informed by such strategies to ensure sound and positive planning for sport and that any facility is sustainable in the long-term.	Paragraph 4.72 amended to incorporate suggested wording.



8	Sport England	Comment	General	General	<p>Sport England and Public Health England launched guidance called Active Design which intends to inform the urban design of places, neighbourhoods, buildings, streets and active open spaces to promote sport and active lifestyles. The guide sets out ten principles to consider when designing places that would contribute to creating well designed healthy communities which has considerable synergy within many elements of the Vision, Objectives and guiding principles within the draft document, particularly in relation to new open spaces, healthy streets, improved blue/green network, multifunctional green spaces, implementing a “Green Loop” and ensuring appropriate infrastructure is installed to facilitate active travel modes. Sport England recommend that the links between the draft document and Active Design are developed further and are really drawn out by having clear references to Active Design, its principles and the Active Design Checklist. Active Design principles and the checklist, for example, could be added to design requirements for any proposal submitted for planning permission. More information on</p>	<p>Reference to Active Design principles/guidance in added at paragraph 4.12.</p>
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					Active Design, including the guidance, can be found at <a href="https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design">https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design</a> .	
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9	Metropolitan Police Service - designing out crime	Support	3.1	Objectives	<p>The MPS is supportive of the few references to safety throughout the plan, which express the desire to achieve safe, healthy and confident communities. In reference to Objectives 3.1.2 it is stated that “A new town centre will serve as the focus of new employment, as well as a hub for wider commercial and community activities, serving as a vibrant, inclusive and safe heart to Meridian Water”.</p> <p>Regarding the safe environment, but also health and wellbeing, the MPS and the Secured by Design scheme can play a huge role in this. Research has consistently shown that crime, the fear of crime and health are related (Crossman &amp; Rader, 2011; McKee &amp; Milner, 2000; Stiles et al., 2003; Whitley &amp; Prince, 2005).</p>	Noted. Adherence to Secured by Design principles is required by DMD37.
9	Metropolitan Police Service - designing out crime	Comment	3.1	Objectives	<p>The above objectives all also make good references to safe spaces. Indeed the objectives 3.1.1, 3.1.2 mentions new schools, health and community facilities, which contribute to a safe heart to Meridian Water’ including for the elderly, children and those with health</p>	Noted.

					conditions or impairment.	
9	Metropolitan Police Service - designing out crime	Comment	4	Guiding Principles	<p>The MPS notes the detail in the 10 proposed guiding principles, particularly that these places have been prepared in the context of the NPPF and the London Plan. For Angel Edmonton, (Para 3.4.7) the crime concerns have been referenced with a clear willingness to address these issues through 'good design'.</p> <p>The MPS would like to see greater reference to addressing crime concerns with good design and indeed with the support of MPS Designing Out Crime officers and the Secured by Design Scheme. This is not reflected at all in the draft MWWBSPD and we would like to draw attention to two areas of the new London Plan (Policy D11 and paras 3.11.3 and 3.11.4)</p>	Noted. As stated above, the existing development plan references designing out crime.

9	Metropolitan Police Service - designing out crime	Comment	6	Infrastructure Delivery	It's noted on p.60 infrastructure category "Emergency Services, A base for the Police in the new community at Meridian Water" we would welcome this outcome and request further communication with ourselves and our Estate Strategy & Engagement team. In this regard due consideration should be paid to Section 17 of the Crime and Disorder Act 1998 which places a duty on local authorities to do all they can to reasonably prevent crime and disorder in their area. Embedding Secure by Design principles fits fully with this obligation.	Noted. Further discussions will take place between the Council as LPA and master developer and the MPS on the detailed planning of police infrastructure.
9	Metropolitan Police Service - designing out crime	Comment	General	General	I would finally like to reference one final section of the London Plan when considering our comments above. London Plan: Policy D11: Section B: Boroughs should work with their local Metropolitan Police Service 'Design Out Crime' officers and planning teams, whilst also working with other agencies such as the London Fire Commissioner, the City of London Police and the British Transport Police to identify the community safety needs, policies	Noted.

					and sites required for their area to support provision of necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. Policies and any site allocations, where locally justified, should be set out in Development Plans.	
10	Goodman	Support	General	General	In broad place-making terms, Goodman is supportive of the principle of transformational regeneration at Meridian Water. We acknowledge that at a high level the Development Plan establishes the Place Shaping Priority Area within the wider Opportunity Area. We also recognise that Area Action Plan policies seek to deliver many new homes and employment opportunities at Meridian Water. Moreover, we note that the recent closure of the IKEA store opens up the possibility of additional development at Meridian Water to the north of Mowlem Trading Estate.	Noted.

10	Goodman	Comment	4	Guiding principle 9: Managing transitions	Nevertheless, it will be vital to ensure that regeneration at Meridian Water does not compromise the continued success of Mowlem Trading Estate. Therefore, as detailed below, care should be taken to ensure that the SPD provides for development that does not conflict with established and future industrial activity.	Noted. The purpose of GP9 is to appropriately manage the interface between existing occupiers and comprehensive redevelopment at Meridian West.
10	Goodman	Comment	5.1	Ikea	In light of the planning considerations detailed in the above commentary, we consider that bullet 11 should be amended as follows (text to be deleted shown in strikethrough and new text shown in bold): “Appropriate design response to manage the interface between development and the busy Angel Edmonton Road, and the <b>Central Leaside Strategic Industrial Location</b> industrial uses to the south of Leaside Road. <b>Development must be designed to ensure that existing and potential industrial uses in the Central Leaside Strategic Industrial Location are not compromised or curtailed, including 24-hour operations and commercial HGV traffic</b> ”	Noted. Change made as suggested. However, rather than amending 5.1 (which is a summary of preceding guidance), new supporting text has been added at 4.80.

					<p><b>movements. Proposals for the redevelopment of the site must be accompanied by an Agent of Change Assessment”.</b></p>	
11	Tesco	Support	General I	General	<p>We support the overall aspirations of the Meridian Water Western Bank SPD in creating a sustainable mixed-use community providing new homes and jobs well served by community infrastructure; and we are keen to maintain a trading presence and keep a store which meets our operational and commercial requirements in line with these objectives.</p>	Noted.



11	Tesco	Comment	5.3	Tesco	<p>On this basis we suggest MW 5.3: Tesco should state specifically the need to keep the Tesco Superstore trading. We require a store of a similar size to the existing with requisite parking numbers, adequate servicing arrangements, and a petrol filling station; and continuity of trade is a prerequisite to the successful operation of the store and serving our customers in the local area.</p> <p>If the opportunity arises going forward we would welcome the chance to discuss with the Council how the new store will be delivered</p>	5.3 amended to include developer aspiration for a replacement store with continuity of trade.
12	Prologis	Support	General	General	<p>Prologis is supportive of the strategy set out in the draft SPD particularly in relation to industrial intensification of sites including the Ravenside site. Prologis also welcomes the ambitions of the SPD in delivering jobs and services which will benefit Enfield residents in Edmonton and beyond, supporting an economy that works for everyone.</p>	Noted

12	Prologis	Support	3.1	Objectives	<p>The objectives for the SPD are set out in Section 3.1 of the document, and one of these objectives is 'facilitating economic growth' to deliver improved commercial opportunities and employment to deliver higher density workspaces. Prologis notes another objective is to 'deliver sustainable development' and 'climate resilient development' which can meet the challenges of the future. Through its intentions to redevelop the Ravenside site, Prologis shares in the vision and objectives of the SPD and looks forward to working collaboratively with Enfield to deliver on these goals.</p>	Noted.
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12	Prologis	Comment	3.1	Objectives	<p>Prologis is concerned about the implications that Figure 3.1: Meridian Water Western Bank vision will have on the delivery of its scheme. We note there are a number of elements of the vision including new and improved links that constrain the development of the Ravenside site. This includes but is not limited to:</p> <ul style="list-style-type: none"> <li>• A Key Bridge across the site's southern boundary</li> <li>• Green loops running along the site's southern boundary, north to south and east to west through the site</li> <li>• Green corridor / Park on the site's eastern boundary</li> <li>• Buffer zone along Heavily Trafficked Roads on northern site boundary affecting size of development parcel</li> </ul> <p>Prologis objects to the potential constraints that would be imposed on the business through the adoption of the draft SPD. We set out below further concerns with the draft SPD written under the relevant headings of the SPD.</p>	<p>Noted. A meeting was held with the landowner and their agent to clarify the consultation response, and the key issue is the EW route through the site, which has been removed from relevant drawings.</p>
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12	Prologis	Comment	4	Guiding principle 3: Blue and green infrastructure network	<p>Prologis is concerned about the implications of designations showing the introduction of 'The Green Loop' and formation of 'Green connections' shown on Figure 4.3 of the SPD and elsewhere within the document, as well as the 'Culverted brook' shown running north to south through the site.</p> <p>These aspirations are set out within Section MW 5.2 Ravenside Retail Park of the draft SPD where the guidance identifies it will be important to activate the waterside setting, and incorporate elements of the green network, including the Green Loop and Lee Navigation Linear Open Space.</p> <p>Prologis welcomes the reference in para 4.24 which states that 'there is a need for flexibility on the route to factor in the optimum position within development proposals and in relation to the provision of infrastructure'.</p> <p>However, at this stage we are of the opinion that the pedestrian link shown running east-west through the middle of the Ravenside site is not deliverable in this location.</p>	Noted, see comment above.
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12	Prologis	Comment	5.2	Ravenside Retail Park	<p>Prologis is concerned about the implications of designations showing the introduction of 'The Green Loop' and formation of 'Green connections' shown on Figure 4.3 of the SPD and elsewhere within the document, as well as the 'Culverted brook' shown running north to south through the site.</p> <p>These aspirations are set out within Section MW 5.2 Ravenside Retail Park of the draft SPD where the guidance identifies it will be important to activate the waterside setting, and incorporate elements of the green network, including the Green Loop and Lee Navigation Linear Open Space.</p> <p>Prologis welcomes the reference in para 4.24 which states that 'there is a need for flexibility on the route to factor in the optimum position within development proposals and in relation to the provision of infrastructure'.</p> <p>However, at this stage we are of the opinion that the pedestrian link shown running east-west through the middle of the Ravenside site is not deliverable in this location.</p>	Noted, see comment above.
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12	Prologis	Objection	4	Guiding principle 2: Carbon reduction	Prologis objects to the requirement in part (1) (low carbon energy supply), which requires that “all developments need to minimise carbon from heating and cooling through connection to the Meridian Water Heat Network (MWHN), by ensuring all connections and networks meet Energetik’s standards, to maximise efficiency and minimise heat loss” as it is an onerous requirement to meet Energetik’s requirements. It is not clear what they are and how a developer can respond to this.	Energetik operate the Meridian Water Heat Network. Policy EL26 of ELAAP requires major developments to connect to Meridian Water Heat Network.
12	Prologis	Support	4	Guiding principle 9: Managing transitions	Prologis supports part (2) which states “multi-storey employment activities (use classes B2, B8, Egiii) are appropriate for the Northern Band as a buffer to the North Circular Road. Premises in the northern band should be designed to provide residential occupiers to the south with an appropriate standard of amenity by helping to buffer noise and pollution from the North Circular Road. Buildings should provide a suitable outlook, activity and visually attractive frontage to the NCR.” However, Prologis requests that the SPD is drafted to allow for flexibility	Guiding principle amended to reference 'supporting ancillary activities'

					for ancillary Class Egi and Class Egii in this location.	
12	Prologis	Comment	4	Guiding principle 10: Tall building definition and height strategy	Prologis welcomes the strategy to the provision of tall buildings and the indicative height parameters on Figures 4.6 and 4.7.	Noted
12	Prologis	Comment	5.2	Ravenside Retail Park	Prologis welcomes the policy aspirations set out in Policy MW5.2 but as explained above have some serious concerns regarding the incorporation of elements of the green network, including the Green Loop and Lee Navigation Linear Open Space. Savills does not see these commitments as being deliverable and should therefore be removed from the SPD.	A meeting was held with Prologis and established that the main issue was the EW link through the heart of the site. Relevant figures have been amended to omit this route.

12	Prologis	Comment	5.2	Ravenside Retail Park	<p>While Prologis is supportive of proposals to deliver development that improves permeability and incorporates elements of the green network, the routes proposed for the blue and green network would have negative implications on the operation of the redeveloped industrial uses at the Ravenside site. A major characteristic of an intensified industrial use would be the need for unrestricted commercial vehicle movements across the entirety of the site, and there would be real concerns about conflicts between vehicles and pedestrians if new public routes were to run across the site. Given the proposed use of the buildings, with floor plates of potentially c. 65,000 sq. ft (GIA), it would also not be possible to break the overall quantum of floorspace (at least 21,700 sqm referenced within the Regulation 18 Enfield Local Plan consultation document of September 2021) down into two or more separate buildings to allow a pedestrian link to run in between.</p>	<p>A meeting was held with Prologis and established that the main issue was the EW link through the heart of the site. Relevant figures have been amended to omit this route.</p>
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12	Prologis	Comment	5.2	Ravenside Retail Park	We believe it is important to show these routes avoiding the industrial site to allow the site to be planned and utilised with maximum effectiveness. We note that Section 4.24 of the draft SPD indicates there is a 'need for flexibility on the route' for the Loop and other green and blue network improvements. However, given the intended use of the Ravenside site for industrial and logistics uses, this element of the proposals shown at Figure 4.4 (Green Loop – indicative axonometric view) needs careful consideration so as not to impact on the deliverability of the proposed scheme.	Noted. The SPD references the need for flexibility on the route.
12	Prologis	Comment	5.2	Ravenside Retail Park	We note in Section 5.2 of the draft SPD that developers will be expected to either deliver the transport and connectivity improvements noted above as part of their proposals or provide financial contributions towards their delivery through Section 106 Agreements, including commitments within Figure 3.1 to key pedestrian/cycle bridges (also shown at Figure 4.1). Prologis has concerns that these commitments cannot be delivered in	The LPA will work with the landowner as part of DM process to discuss the exact location of bridges and apportionment of costs.

					the locations shown.	
12	Prologis	Comment	5.2	Ravenside Retail Park	We consider the emerging SPD should be reviewed so that its good intentions to deliver sustainable development would not be to the detriment of the deliverability of strategic sites. We suggest it would be more appropriate for the SPD to focus on delivering blue and green network improvements around the perimeter of the Ravenside Retail Park. We feel this would improve the prospects of the SPD facilitating the redevelopment of the Site to provide a high quality employment scheme.	The SPD is flexible on the route and width of the route. The exact nature of the green loop in this location will be established through dialogue and any subsequent planning application, though Figure 2.2 has been amended to show the green loop running on the southern perimeter of the Prologis site, and River Lee Navigation Open Space on its eastern perimeter.
13	Ikea	Comment	General	General	It is demonstrated below that the draft SPD is, in part, not considered to be “positively prepared”, “effective” and “consistent with national policy” but is capable of being so with modifications.	The tests of soundness set out in the NPPF apply to local plans and spatial development strategies rather than SPDs.

13	Ikea	Comment	General	General	The adopted Plan suggests that the Meridian Water area could delivery around 5,000 homes, although the emerging Local Plan recognises that the area has greater capacity and the ability to deliver in excess of 10,000 homes	Noted. The SPD has been prepared with reference to the existing development plan, which references the delivery of 5k homes. The emerging Reg 18 Enfield Local Plan (at para 3.5.6) references the 10k homes aspiration for Meridian Water as a whole, rather than solely Meridian West.
13	Ikea	Comment	General	General	Whilst it is recognised by Quod that the draft SPD must respond to the adopted Local Plan, the emerging Local Plan cannot be ignored and nor would it be in the interest of good planning to do so. Notably, the emerging Local Plan adopts a spatial strategy which seeks to focus the Borough's housing needs on sustainable brownfield sites, such as Meridian Water, in order to minimise greenfield (and especially those in the Green Belt) release. However, given the scale of housing need in the Borough, it is recognised by the Council in their Regulation 18 Local Plan that Green Belt release will be necessary in order to meet the Borough's housing needs. It is, therefore, in the interests of sustainable planning objectives that the efficient use of suitably located	Noted. See above. The emerging Reg 18 Enfield Local Plan is at a relatively early stage of preparation, so the weight it can legitimately carry is correspondingly limited.

					brownfield land should be promoted.	
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13	Ikea	Comment	General	<p>General</p> <p>The consequence of the draft SPD drawing down from the now aged Local Plan, leads the draft SPD to set as its objectives the delivery of approximately 5,000 homes. It is clear that if this remains the objective of the draft SPD, it will fail to make effective use of land for the following reasons.</p> <ol style="list-style-type: none"> <li>1. Within the Meridian Water Western Bank area, there are already over 3,000 homes consented.</li> <li>2. The consented lands do not include the IKEA site (nor the Tesco site) which is identified as being a key redevelopment opportunity, and one that can help satisfy the Borough's needs for new homes. The IKEA site alone has the potential capacity for up to 3,000 homes. This excludes the scale of development that is potentially deliverable on the Tesco site.</li> <li>3. The IKEA site is identified as being suitable for dense development.</li> </ol> <p>In view of the above, if the SPD maintains an objective that only 5,000 houses should be delivered at Meridian Water, that will render the development of IKEA at a low and understandably inefficient density</p>	<p>Noted. See above re the 5k homes figure.</p>
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13	Ikea	Comment	General	General	<p>It is IKEA's view that the draft SPD fails to take into account the ambitious growth plans of Enfield Council and the evident suitability of the area to provide a greater level of housing than is indicated as being deliverable within the draft SPD. In this respect, the Plan has not been positively prepared, nor is it consistent with national policy. In order to remedy this, IKEA suggest that the draft SPD should recognise that the Western Bank of Meridian Water is capable of delivering substantially more than 5,000 homes, albeit is necessary that if more than 5,000 homes are proposed, then they need to be justified by appropriate evidence.</p>	<p>Noted. See above re the 5k homes figure.</p>
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13	Ikea	Comment	4	Guiding principle 6: Commercial activity areas	<p>The site's suitability for a major employer is not denied by IKEA, however, it should not be seen as a pre-requisite of the redevelopment of the IKEA site. This is especially important if early delivery is to be achieved, as the market for major scaled commercial, cultural, creative or sport/leisure operators is limited. It is notable that the draft SPD notes that the most appropriate location for a strategic occupier is in the "Broad Band" of the IKEA site. It is, however, important that the draft SPD does not rule out other locations within the IKEA site for such an occupier, in the event that there is market demand; for example, it is recognised that the "Northern Band" is appropriate for major commercial development is appropriate for major commercial development, given that it will buffer development to the south from the North Circular, and this area should not be ruled out as a potential location for a strategic occupier. Therefore, in order to ensure that the SPD is flexible enough to respond to market demands, it is important that the provision of a strategic occupier is seen only as a potential, and its location is not fixed to the Broad</p>	<p>The SPD refers to the 'potential' for a strategic occupier. Guiding principle and supporting text amended to indicate the town centre (particularly the IKEA site) as having potential to accommodate a strategic occupier, rather than the Broad Band specifically.</p>
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					<p>Band area of the site only. Such flexibility will enable the expedient delivery of regeneration of the site, and in the interests of good planning.</p>	
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13	Ikea	Objection	4	Guiding principle 10: Tall building definition and height strategy	Whilst the Guiding Principle 10 it is guidance only it is expressed prescriptively in Guiding Principle 10, where it states that maximum heights are to be set within the Western Bank. IKEA object to the prescriptive nature of Guiding Principle 10 in this respect.	Noted. As an SPD the guidance falls short of being a policy requirement, which limits its prescriptive application. The SPS also states that "The maximum heights are recommended on a townscape and tall buildings policy basis only. Proposals above this height may be considered if other material considerations can clearly justify this (including the ability to meet other planning policy requirements and as a result of more detailed site-specific design analysis)" (4.89) - this provides flexibility and indicates that the heights stated are recommended guidance rather than prescriptive limits.
13	Ikea	Comment	4	Guiding principle 10: Tall building definition and height strategy	Figure 4.7 sets out the height strategy for the area, and identifies the areas where tall buildings are to be focussed. Whilst it is recognised that this Figure is only indicative, it is notable that there is a proposed clustering of tall buildings around the train station, and on the south west apex of the Tesco site. It is notable, however, that the north western apex of the IKEA site is not identified for a tall building cluster. In view of good urban design and efficient use	The guiding principle of which the figure forms part is indicative guidance rather than prescriptive policy. No change made in order to avoid overshadowing impacts on public spaces to the north (including Market Square).

					of sustainably located brownfield land, this part of the IKEA site is one of the most sustainable locations for a tall building cluster of a similar height to that supported on the Tesco site, and the draft SPD should recognise this.	
13	Ikea	Support	4	Guiding principle 10: Tall building definition and height strategy	IKEA support the approach to tall buildings along the main arterial routes (including the Spine Road and Angel Edmonton Road) but as noted above, the draft SPD should be used as guidance only. Furthermore, there should be express reference within the draft SPD that tall buildings outside the areas generally shown on Figure 4.7 will be considered on their merits.	Noted. The draft SPD states that 'Proposals above this height may be considered if other material considerations can clearly justify this (including the ability to meet other planning policy requirements and as a result of more detailed site-specific design analysis).' (para 4.89). No change made.
13	Ikea	Comment	6	Infrastructure Delivery	In the absence of certainty of the programme for delivering the SIW it is important that the draft SPD does not inhibit development from coming forward that can be delivered without the SIW. This would include the IKEA site. It is recognised, however,	Noted.

					by IKEA that any development of their site should not frustrate or undermine the delivery of the SIW.	
13	Ikea	Comment	6	Infrastructure Delivery	Section 6 of the draft SPD sets out the key infrastructure requirements for the Western Bank area. It is, however, notable that none of the infrastructure has been costed and the burden on development is, therefore, not currently known, nor is the viability of funding such infrastructure. Notably, Table 6.1 notes that some of the infrastructure costs are to be borne by the redevelopment of the IKEA site (amongst others). This includes a range of matters including improved bus access and services, improved train station facilities (eg, platform capacity/extension), public realm improvements and schooling infrastructure amongst other matters. There is no detail within the draft SPD of the nature of the infrastructure required, nor as mentioned above the costings, and IKEA would wish to engage further with Enfield Council to understand this detail in order to determine	The Council will work with developers bringing forward schemes to establish costs and apportionment arrangements. Where infrastructure items are intended to serve more than one development negotiations will establish suitable apportionment arrangements. The Council as promoter and master developer will work closely with developers and landowners and share indicative costs and associated information as appropriate.

					<p>whether it is viable and appropriate to provide such infrastructure. IKEA currently object, therefore, to the omission of a fully costed infrastructure delivery plan.</p>	
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13	Ikea	Comment	6	Infrastructure Delivery	<p>Specifically, in relation to the provision of school infrastructure, it is noted in the draft SPD that “the IKEA site is considered to be an optimal location for a school”. It is not clear why the site is considered an “optimal” location, nor what type of school is to be provided (albeit, in discussions with Enfield Council Officers, Quod have been informed this is intended to be a primary school). There is no evidence to demonstrate that there is a need for a further primary school, beyond that already proposed (Meridian Water 211) or to be upgraded already in existence (Meridian Angel Primary School).</p> <p>Notwithstanding the above, if it is concluded that the IKEA site is appropriate for a school and a school is necessary on this site, then funding for it should be proportionate to the needs generated by the redevelopment of the IKEA site, and other funding apportioned from other developments.</p>	<p>Supporting text 4.71 states that the site is considered an optimal location for a school because of 'the strategic location and size of this site which could place a school near the station and Green Loop/ Brooks Park in close proximity to the Main Street and the train station, and the significant mixed-use redevelopment potential of the site and the number of homes this could provide.' The Council will work with developers bringing forward schemes to establish costs and apportionment arrangements. Where infrastructure items are intended to serve more than one development negotiations will establish suitable apportionment arrangements. The Council as promoter and master developer will work closely with developers and landowners and share indicative costs and associated information as appropriate.</p>
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13	Ikea	Comment	4	Guiding principle 7: Delivering a new town centre	The draft SPD promotes the creation of a new “Town Centre” along Main Street12, as required by ELAAP Policy EL3 notes a “new town or local centre” at Meridian Water. The draft SPD, however, lacks clarity as to what scale and role is proposed for the “Town Centre” and paragraph 4.32 simply states that it should be a “large local centre” which is defined as something that is smaller than a “district centre”. Greater definition is required, to provide clarity to the development industry.	The town centre hierarchy is set out in the Core Strategy and gives further guidance on the scale and role of the town centre to be delivered at Meridian Water.
13	Ikea	Comment	4	Guiding principle 1: Movement and connectivity	Delivery of Main Street – It is proposed as part of General Principle 1 that developments are expected to deliver Main Street, although this is proposed to be delivered by Enfield Council as part of the SIW. It is, therefore, not necessary to pass this obligation on to developments.	The Strategic Infrastructure Works will deliver the road and infrastructure, and some public realm works. The guiding principle states that 'Development should <u>facilitate</u> the delivery of Main Street' (emphasis added), i.e. make possible the delivery of Main Street, including through the provision of suitable town centre activities and associated public realm.

13	Ikea	Comment	4	Guiding principle 1: Movement and connectivity	Bridges Across Rivers – General Principle 1 notes that the delivery of bridge crossings will be supported, although it is not clear who will be responsible for delivery of the bridge crossings or their functions. More so, it is suggested on Figure 4.3 that there are proposed to be two pedestrian and cycle bridges across the Pymmes Brook (and further crossings over Salmon’s Brook and the River Lee). As set out above in relation to the matters of funding and delivery, if these are to be provided by the developments of the sites adjoining these crossings, then the cost of delivery should be apportioned to all sites that will benefit from these bridges.	The Council will work with developers bringing forward schemes to establish costs and apportionment arrangements. Where infrastructure items are intended to serve more than one development negotiations will establish suitable apportionment arrangements. The Council as promoter and master developer will work closely with developers and landowners and share indicative costs and associated information as appropriate.
13	Ikea	Comment	4	Guiding principle 3: Blue and green infrastructure network	Brookes Park Expansion – It is stated that the Park proposed as part of Meridian Water 2 will expand onto the IKEA site. It is unclear what area is proposed for the Park, and whether the works proposed are feasible. Paragraph 4.25 refers to various earth works proposed on the West Bank of the Brook, i.e., on IKEA’s land, and it is unclear what earth works are proposed and if these are feasible. Greater clarity	Work is ongoing to confirm the extent of Brooks Park and associated earthworks. Engagement with the landowner will continue as proposals are finalised.



					and definition of the scale of the Park on the IKEA site is necessary, and it is understood from discussions with Enfield Council Officers that an area of circa 1.0 acre is proposed.	
13	Ikea	Comment	4	Guiding principle 3: Blue and green infrastructure network	Green Loop – General Principle 3 proposes a Green Loop as part of the masterplanning of the area, with the width indicated at “up to 20m”. Such an area of land take is substantial on the IKEA site, given that site is identified as a key contributor to the Green Loop. In this case, the future cost of provision and maintenance should be borne by all developments that will benefit from the Green Loop and costs, therefore, associated with its delivery and maintenance should be apportioned across the Western Bank developments.	The Council will work with developers bringing forward schemes to establish costs and apportionment arrangements. Where infrastructure items are intended to serve more than one development negotiations will establish suitable apportionment arrangements. The Council as promoter and master developer will work closely with developers and landowners and share indicative costs and associated information as appropriate.

13	Ikea	Comment	4	Guiding principle 3: Blue and green infrastructure network	De-culverting Pymmes Brook – Paragraph 4.28 of the draft SPD notes that the Pymmes Brook will be de-culverted, and whilst this is not objectionable in principle to IKEA, it is necessary for the draft SPD to recognise that such de-culverting should only be required where it is feasible and viable.	The revised SPD wording states 'naturalisation (including removal of the midchannel wall) and access to sufficient daylight are encouraged where feasible.' (4.35).
13	Ikea	Comment	4	Guiding principle 5: Housing and design quality	“Exemplar” Design Quality and Sustainability – General Principle 5 notes that “exemplar” design is to be sought in the developments that take place at Meridian Water. Exemplar is not defined in the draft SPD, nor is it a recognised planning term. Consequently, the reference to exemplar should be changed to “good design” which is a recognised planning term.	The word 'exemplar' is understood to be a recognised planning term - the London Plan refers to 'exemplary design' and 'exemplary architectural quality.'
13	Ikea	Comment	General	General	Spine Road/Main Street/Strategic Infrastructure Works – Throughout the document there are a number of references to these three definitions and for the sake of clarity, it is suggested that the references should be consolidated into a single definition.	Document amended to make it clear that Main Street/ central spine are the same. SIW is related but different (i.e. SIW encompasses more than just the spine road)

14	Haringey	Support	General	General	This SPD policy framework will guide new development up to 2032 and remains consistent with previous Enfield planning documents that development will support the delivery of around 5,000 homes and 1,500 new jobs. It is helpful to understand more about the Council's ambitions for the type and quality of development it expects in the Western Bank area and how it proposes that the interfaces between various land uses will be managed. Haringey broadly welcomes the greater level of detail on how the vision for high quality development will be achieved on the Western Bank.	Noted. Discussions on the development of specific sites will continue.
14	Haringey	Comment	General	General	Engagement on specific development sites such as the former IKEA, Ravenside Retail Park, Tesco and 'Teardrop' will be important as they come forward. Haringey has Strategic Industrial Land adjacent to Meridian Water and coordination of development will be important.	Noted. Discussions on the development of specific sites will continue.

14	Haringey	Comment	4	Guiding principle 7: Delivering a new town centre	We note that the Enfield Core Strategy and ELAPP indicate that Meridian Water will accommodate a new 'large local' centre – smaller than a district centre but larger and more significant than a typical suburban shopping parade. We welcome continued engagement as this proposal develops. The main purpose of this will be to ensure that the new retail centre complements rather than competes with the surrounding district centres. This was raised as a consideration in ELAPP. In Haringey, the nearby retail centres in Tottenham and Northumberland Park are also planned to undergo significant investment and regeneration.	Noted. Engagement will continue as detailed proposals develop.
14	Haringey	Comment	4	Guiding principle 1: Movement and connectivity	Haringey has been engaging with Enfield for some considerable time in relation to the delivery of Meridian Water and, as part of this process, has consistently raised the importance of Enfield providing further detail of transport and highways impacts on Haringey. This is particularly having regard to the fact that many journeys to and from Meridian Water will be via Haringey and that future improvements to	Noted.

					support Meridian Water would need to be delivered within Haringey.	
14	Haringey	Comment	4	Guiding principle 1: Movement and connectivity	We consider that the Meridian Water Western Bank SPD provides a timely and important opportunity to identify the transport and highways impacts on Haringey and to establish a robust strategy to ensure they are suitably mitigated. More work is required on the draft SPD to deliver this and we request that this is addressed ahead of the SPD being adopted by Enfield.	SPD amended to include more information on required transport infrastructure (GP1 supporting text and chapter 6). Ongoing discussions with LBH will address potential impacts going forward.

14	Haringey	Comment	6	Infrastructure Delivery	<p>Chapter 6 of the draft SPD sets out the infrastructure requirements needed to deliver the scale and type of development proposed within the SPD area. We request that transport and highways impact on Haringey is properly identified within Chapter 6 of the SPD and that the list of infrastructure requirements to support delivery is broadened, specifically to include requirements to address identified impacts on Haringey. Greater detail should be provided on infrastructure requirements (including highways, bus improvement and pedestrian and cycling routes) so that there is clarity at application stage over the expected provision of transport infrastructure and related funding including Community Infrastructure Levy and Section 106 contributions. This could be drawn from the various transport studies and assessments produced to support the emerging Enfield Local Plan, Edmonton Leaside Area Action Plan, draft SPD, as well as those submitted in support of various planning permissions.</p>	<p>SPD amended to include more information on required transport infrastructure (GP1 supporting text and chapter 6). Ongoing discussions with LBH will address potential impacts going forward.</p>
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14	Haringey	Comment	6	Infrastructure Delivery	For example, a new West Anglia Mainline pedestrian/ cycle bridge is referred to in the planning permission for strategic infrastructure works at Meridian Water (19/02717/RE3) but is not currently mentioned in the draft SPD. This should be added to the SPD as the poor walking and cycling environment is a major constraint to a successful development outcome and forms part of a key route through to the High Road and Tottenham Hotspur Stadium.	The vision diagram (Figure 3.1) shows the WAML bridge. In addition, Chapter 6 refers to the provision of bridges, including 'WAML Bridge – link across Angel Edmonton Road and railway line provide direct connection between Phase 1 and Phase 2.'
14	Haringey	Comment	6	Infrastructure Delivery	The Transport Assessment for Phase 2 of Meridian Water includes a series of recommendations for the Active Travel Zone to improve major active travel routes to and through Haringey. We believe that the need for the Meridian Water development to help fund these improvements should be made explicit within the SPD.	Noted - further information added to Chapter 6

14	Haringey	Comment	General	Guiding principle 10: Tall building definition and height strategy	As part of our New Local Plan Haringey will be producing a tall buildings strategy to identify appropriate locations for tall buildings in the borough. We note the tall building strategy for Meridian Water West Bank and would welcome continued engagement with Enfield to address any potential issues arising from tall buildings in both boroughs including properly integrating development with its surroundings. It is encouraging to see the SPD statement recognising the “need to form a coherent and varied (including height) townscape and avoid creating a “wall” of development or overdeveloping individual sites”.	Noted. Discussions on the development of specific sites will continue.
15	Environment Agency	Comment	3.1	Objectives	Point 5 Celebrating the Lee Valley waterways and open spaces (Page 17) We recommend that this has more ambitious wording e.g. “take every opportunity to restore and enhance waterways and riparian habitat, to improve geomorphology and increase biodiversity. This will provide resilience to climate change impacts and urban water quality pressures, and contribute to Water Framework Directive objectives to	Suggested wording drawn on as part of amended text



					bring waterbodies to good ecological potential.”	
15	Environment Agency	Comment	4.17	Guiding principle 3: Blue and green infrastructure network	4.17 Page 23 Suggested change: “and to naturalise watercourses and riparian habitat to provide improved geomorphology and biodiversity.”	Suggested wording drawn on as part of amended text
15	Environment Agency	Comment	Points 1 and 2	Guiding principle 3: Blue and green infrastructure network	Biodiversity and Nature Recovery page 24 1. All developments should significantly enhance the blue and green infrastructure network and restore, enhance and increase wildlife, biodiversity and geomorphology. 2. Biodiversity Net Gain – we would suggest there is a more robust ask to increase uplift (i.e. at least 20%, or separate the need to increase BNG for terrestrial and rivers separately. In urban environments this is easier to deliver than areas	Suggested text included as part of a revised point 1. However, introducing 20% BNG would effectively be introducing new policy, which is outside the remit of the SPD.

					where there is already habitat value).	
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15	Environment Agency	Comment	Points 9, 10 and 12	Guiding principle 3: Blue and green infrastructure network	<p>Blue Network</p> <ul style="list-style-type: none"> <li>• 9c &amp; d <ul style="list-style-type: none"> <li>o It should be made clearer that naturalisation is a requirement wherever possible, and that costs and complexity are not justifications for infeasibility. e.g. “not possible due to land contamination that cannot be remediated or increases in flood risk that cannot be mitigated”.</li> <li>o Please change suggestion of floating reed beds to: “sustainable and innovative urban habitat creation” and add “improvements to geomorphology” after gravels.</li> <li>o It should be noted that the opportunities to deculvert and naturalise the Pymmes Brook, Salmons Brook and River Lee should be taken, and designed into the scope of development from the beginning.</li> </ul> </li> <li>• 10 <ul style="list-style-type: none"> <li>o Surface water management should have detailed, long-lasting and accountable management plans in place to ensure they continue to filter pollutants and silt, rather than releasing them.</li> </ul> </li> <li>• 12 <ul style="list-style-type: none"> <li>o Perhaps change “maximise” to “restore”, and please add the word</li> </ul> </li> </ul>	<p>9, Part C - wording added: 'and reasonable endeavours should be taken to implement naturalisation and deculverting.'</p> <p>9, part d - change made as suggested.</p> <p>10 - suggested wording included as part of supporting text 4.28</p> <p>12 - suggested changes made.</p>
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					“geomorphology”.	
15	Environment Agency	Comment	4.21 and 4.22	Guiding principle 3: Blue and green infrastructure network	Whilst there should be habitat in all green spaces, there needs to be clear areas of designated undisturbed habitat e.g. riparian buffer zones with no footpath, lighting or amenity furniture	Supporting text 4.26 amended accordingly.

15	Environment Agency	Comment	4.23	Guiding principle 3: Blue and green infrastructure network	Perhaps write that any footpaths and cycleways need to be permeable/porous.	Text amended accordingly
15	Environment Agency	Comment	4.26	Guiding principle 3: Blue and green infrastructure network	<p>It should also say that proposals should look to naturalise as ambitiously as possible rather than doing the bare minimum. Perhaps include the Environment Agency's requirements with regards to Biodiversity, Geomorphology, Flood Risk and Contaminated Land. Could we also suggest that you ask developers to look to integrate river naturalisation with neighbouring schemes and those on the opposite bank, to maximise improvements and create a more joined up approach?</p> <p>We suggest that "feasibility studies should be undertaken to scope out the most appropriate form of river naturalisation, with a view to getting as close to fully scale restoration as feasible", should be updated as follows: "feasibility studies should be undertaken to scope out the most appropriate form of river naturalisation, with a view to getting</p>	Changes made to paragraph 4.32 to include reference to '... with a view to getting as close to fully scale restoration as technically feasible' as suggested. Further text added to reference Environment Agency's guidance. Reference to having regard to nearby naturalisation schemes added as suggested.

					as close to fully scale restoration as technically feasible".	
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15	Environment Agency	Comment	4.27	Guiding principle 3: Blue and green infrastructure network	<p>Indicates intention to prioritise green roofs (biodiversity value) and rain gardens for visual and habitat value. This doesn't follow the London Plan 2021 hierarchy (Policy SI 13 Sustainable drainage) which indicates using rainwater as a resource (rainwater harvesting, blue roofs for irrigation) first, rainwater infiltration to ground or close to source second (unlikely possible given assume confined nature of area for this development) and then rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens) third. Given this is a water stressed area, reflected in the need to adopt the higher water efficiency level for new builds detailed within Part G of the Building Regulations (London Plan 2021 Policy SI5 Water infrastructure), adopting rainwater harvesting options where appropriate (perhaps roofs of large commercial buildings &amp; schools, which could then be used for toilet flushing etc, and water butts for residential properties) could enhance the 'sustainable development' credentials of the site (detailed in the Vision) whilst also following London Plan policies.</p>	<p>Text amended as suggested to reference the GLA's drainage hierarchy, and flag rainwater as a resource as a priority. Reference made in supporting text on the need for effective SuDS maintenance.</p>
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					<p>SuDS features need a clear and accountable maintenance regime implementing to ensure these features continue to be effective, particularly with regards to sediment and pollution control measures. This is of note as there's no particular reference to ensuring these remain functional or any aspiration/ expectation/ benefit to improving the quality of water draining from the site. Surface water run-off from urban environments is impacting on our rivers, so recognising and addressing impacts of this from these developments is key.</p>	
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15	Environment Agency	Comment	4.28	Guiding principle 3: Blue and green infrastructure network	Perhaps include that developers should seek to remove the mid-channel wall wherever possible. And perhaps make this a stronger ask by requiring a feasibility study?	Point 9 of the guiding principle references the desirability for naturalisation, and 4.32 references the need for feasibility studies. Reference made as suggested in 4.35 to the removal of the mid-channel wall.
15	Environment Agency	Comment	Point 1F	Guiding Principle 4: Sustainable construction management	1f – references the use of the Lee Navigation for the delivery of construction materials and goods. Whilst I appreciate this will remove/reduce vehicle pressure on roads, this should be done in a way which doesn't cause any deterioration for this water body. I.e., travelling at a slower pace to ensure reduced impact on erosion due to bow waves, the choice of mooring location etc.	New para of supporting text added (4.40) to reference these considerations.

15	Environment Agency	Comment	5.2	Ravenside Retail Park	Whilst there is reference to “activating the waterside setting, and incorporate elements of the green network, including the Green Loop and Lee Navigation Linear Open Space”, there’s no specific reference to the Salmons Brook which runs through this site. This is a direct contradiction to the Pymmes Brook, which is specifically referenced within the high level guidance related to the MW5.3: Tesco site. It’s strongly recommended that the Salmons Brook is referenced within the high level guidance related to the MW5.2: Ravenside Retail Park site, with requirement to restore the channel and riparian corridor through development.	Text included to state 'Investigate the potential to naturalise Salmons Brook and improve the riparian corridor.'
16	National Grid	Comment	General	General	Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to National Grid assets. Gas Transmission - ZBD ROUTE: 275Kv Overhead Transmission Line route: BRIMSDOWN - TOTTENHAM - WALTHAM CROSS 1	Noted

17	Canal and River Trust	Support	3.1	Objectives	<p>We strongly believe that the Navigation can play a central role in placemaking within Meridian Water, and it is therefore encouraging and positive to note that overall this is acknowledged within the SPD. There are many supporting statements about the role the Navigation can play in the development of Meridian Water and, more generally, it is positive that blue-green infrastructure is seen as an integral part of the approach to placemaking, and the Lee Navigation is included in the key SPD objectives (3.1) in terms of North-South connectivity, and in celebrating the Lee Valley waterways and open spaces.</p>	Noted
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17	Canal and River Trust	Comment	4	Guiding principle 1: Movement and connectivity	<p>It is encouraging that the Trust are identified as a key stakeholder and developers are encouraged to engage with the Trust on any proposals for new bridge crossings (Para 4.6) We would suggest that this should be expanded to encourage early engagement with the Trust on all development proposals adjacent, or close to the Navigation.</p> <p>The Trust have previously suggested that the towpath and Towpath Road should be within the scope of this SPD. It is understood that the intention is for the SPD area to extend only up to the eastern bank of the Navigation with the towpath and Towpath Road outside the scope of the SPD. As a result, this feels somewhat like a retrograde step compared to the detailed proposals in the Towpath Strategy. Nevertheless, the red line boundary within the draft document (Figure 1.1) seems to include some land beyond the eastern bank and the extent of the SPD area should therefore be clarified and the plan amended accordingly.</p>	<p>The desire for early engagement on development proposals adjacent or nearby the Navigation is noted. Towpath Road has been excluded from the SPD area because of wider strategic issues relating to the SIL land of which Towpath Road forms part. Figure 1.1 amended to show an SPD boundary along the eastern bank of the River Lee Navigation, excluding SIL land, for the sake of accuracy and clarity.</p>
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17	Canal and River Trust	Comment	4	Guiding principle 2: Carbon reduction	<p>The Trust wish to highlight the potential of the Navigation for heating &amp; cooling and the document could be amended to include reference to this potential of the waterway network to contribute to low carbon technologies.</p> <p>Applicants/developers should be encouraged to discuss the options in relation to this, and any commercial agreement that would be required, with the Canal &amp; River Trust. More details can be found on our website: Heating and cooling systems   Canal &amp; River Trust (<a href="http://canalrivertrust.org.uk">canalrivertrust.org.uk</a>)</p>	New supporting text added at 4.20.
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17	Canal and River Trust	Comment	4	Guiding principle 3: Blue and green infrastructure network	<p>This section sets out the proposals for the 'Green loop' with Figure 4.4 giving an indication as to how this may be laid out along sections where there would be built development to both sides. The Green loop though also extends along the western bank of the Navigation and in those circumstances, there would only be built development to one side. It is important that the document acknowledges that a different approach would be required where there is a water frontage to consider. In addition, there is reference to 'river naturalisation' (Para 4.26) and it should be clarified that the approach to Pymmes Brook would differ from that required for the River Lee Navigation. Any proposals would need to consider and ensure there would be no adverse impact to the structural stability, operation, or safe navigation of the waterway. Any landscaping would need to be native species appropriate to the waterside location with details on future maintenance and management regimes and responsibilities also provided for consideration. This principle could also recognise the urban cooling benefits of blue</p>	<p>Text added to 4.30 to recognise water frontage of the Green Loop at the Navigation. References to 'river naturalisation' changed to 'watercourse naturalisation' to avoid confusion between intentions for the brooks/ River Lee Navigation. Cooling benefits of blue spaces referenced in point 7. Text added to 4.33 to state 'Any surface water discharge to the River Lee Navigation would require prior consent from the Canal &amp; River Trust.'</p>
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					<p>spaces in the same way that the green infrastructure section does (point 7). There is reference to surface water management measures, and we wish to highlight the potential for surface water drainage to the Navigation. Any surface water discharge to the waterway would require prior consent from the Canal &amp; River Trust. Full details of any proposed discharge would need to be submitted and include appropriate mitigation measures to ensure there would be no adverse impact to water quality or structural integrity of the waterway. As the Trust is not a land drainage authority, such discharges are not granted as of right-where they are granted, they will usually be subject to completion of a commercial agreement.</p>	
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17	Canal and River Trust	Comment	4	Guiding principle 4: Sustainable construction management	Point 1a) should be expanded to require construction compounds to be located away from sensitive receptors, both human and environmental.	Point 1a amended to reference sensitive receptors.
17	Canal and River Trust	Comment	4	Guiding principle 7: Delivering a new town centre	This seeks to concentrate town centre activities around the train station, along Main Street and adjacent to where Main Street converges with the Navigation, identified as 'riverside square'. There seems to be further opportunity here to encourage consideration of facilities and access for water-based activities. It would also be positive if the document could include reference to moorings, both short-stay and longer 14 day or permanent moorings and the provision of boater facilities such as water, waste, Elsan and pump out and electric shore based power.	Paragraph 4.62 amended to address the issues as suggested.
17	Canal and River Trust	Comment	4	Guiding principle 9: Managing transitions	It may be beneficial to include more detail in relation to the approach to transitions from/to Blue/Green infrastructure and consideration of the impacts of industrial uses on the natural environment and users of the	Text on transitions added to 4.79. The impacts of industry on the natural environment and waterway is addressed through higher level policy and environmental legislation.



					waterway.	
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17	Canal and River Trust	Comment	4	Guiding principle 10: Tall building definition and height strategy	<p>This principle seeks to establish a tall building strategy for the SPD area. Area 2 covers the western bank of the Navigation and much of the SPD area. The strategy as currently drafted identifies 39m as a local definition for this area with tall cluster buildings, up to 69m and 57m along the spine road. The Trust are concerned with this approach to heights adjacent to the Navigation, and the proposal for tall 'nodes' around the bridges, especially if these are to be associated with open spaces which may become less attractive if bounded by excessively large buildings. The approach to tall buildings within the SPD would also seem to be at odds with Policy EL11 of the Edmonton Leaside AAP which seeks to ensure that buildings conform to height, width ratio appropriate for the street, avoid locating tall buildings on adjacent corners to prevent a 'fortress like' visual impact, avoid creating a 'wall of tall buildings and compromising the enjoyment of open spaces, including water spaces through overshadowing. The Trust therefore consider that an 'Area 3' should be included along the Navigation with figure 4.6 amended to require a step</p>	<p>The local definition proposal has been omitted from the SPD in response to representations received as part of public consultation.</p> <p>The existing policy framework, when read as a whole, contains appropriate policies to prevent undue negative impacts on open spaces. This is reinforced at paragraphs 4.90 and 4.91.</p> <p>However, it is considered that the bridge location, public open space and eastern portion of the high street are an appropriate location for tall buildings, in line with Policies D1,2,3,9 and CCG 2 of the London Plan: This is an important route, crossing point and activity hub for the area.</p> <p>The SPD does not contradict Policy E11 of ELAAP. Paragraphs 4.90 and 4.91 are clear that the height zones to not allow a blanket approach and all other considerations necessary for good design are still relevant. Any proposal would be subject to microclimatic modelling to ensure undue overshadowing is avoided.</p>
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					<p>down to the Lee Navigation. In addition, figure 4.7 should also be amended to require a step down in building heights along the spine road as it approaches the new Lee Navigation crossing. Preferably this would apply both north and south of the spine road, though designing a step down on the southern side would be particularly important for creating an attractive riverside square on the northern side (as set out in guiding principle 7).</p>	
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17	Canal and River Trust	Comment	6	Infrastructure Delivery	It has been confirmed verbally with Council Officers that the reference to 'Meridian Water towpath' within Table 6.1 in fact relates to the new path to be created on the off-side. This should be made clear in the SPD though there seems to be no reason why this table could not also include infrastructure outside of the SPD area (as it does already for emergency services). The Table should therefore be amended to include reference to improving the towpath / Towpath Road in accordance with the principles of the Towpath Strategy, given the role the towpath plays in providing access to the Lee Valley Regional Park.	Terminology to be changed in table 6.1 to clarify - Lee Navigation western bank rather than towpath.
18	Swifts Local Network - Swifts & Planning Group (London)	Support	4	Guiding principle 3: Blue and green infrastructure network	The Biodiversity and Nature Recovery section under Guidance Principle 3 (page 24), and other references to biodiversity, are very welcome, especially given the close proximity to the Lee Valley SPAs and SSSIs. However, new immature habitats provide no opportunity for cavity-nesting birds to nest and roost, nor for bats to roost, as these require older buildings or mature trees which are absent from an	Noted. There is indeed a lack of mature trees, though improvements to the green network should provide mature trees over the coming years.

					immature landscape.	
18	Swifts Local Network - Swifts & Planning Group (London)	Comment	4	Guiding principle 3: Blue and green infrastructure network	Therefore, we request that as a minimum you include this relevant statement from the National Planning Policy Guidance 2019 Natural Environment paragraph 023: "Relatively small features can often achieve important benefits for wildlife, such as incorporating 'swift bricks' and bat boxes in developments and providing safe routes for hedgehogs between different areas of habitat." If you are able to add further detail, please state that swift bricks should be installed in accordance with best-practice guidance, which for example is provided by CIEEM. They provide advice with regard to location and numbers.	Points included as part of new para 4.5.

19	GLA	Support	General	General	The Mayor welcomes the development of the area-based guidance as part of a design led approach to delivering good growth in this key area of regeneration. The document provides a clear vision for change as well as priorities which build upon those set out within the adopted Edmonton Leaside Area Action Plan (ELAAP) (2020), the Enfield Core strategy (2010) and the Enfield Development Management policies (2014).	Noted
19	GLA	Comment	General	Guiding principle 10: Tall building definition and height strategy	However, due to the timing of the Enfield Local Plan refresh (with a regulation 18 version consulted upon early in 2021), there are issues with the extent of guidance set out within the draft SPD in relation to tall buildings which should be addressed prior to its formal adoption.	Noted. Follow-up meeting held with the GLA to clarify and discuss issues identified in the representation.

19	GLA	Comment	4	Guiding principle 10: Tall building definition and height strategy	<p>None of these DPDs include a quantitative local tall buildings definition and, whilst the ELAAP notes the 'strong rationale' for tall buildings within the Meridian Water area (para.5.11.7), none of these DPDs map out locations appropriate for tall buildings or set appropriate heights within those locations. Despite this, within Guiding Principle 10: Tall buildings (GP10), the draft SPD introduces a new local definition for tall buildings, includes specific heights which might be considered appropriate as well as locations where tall buildings would be an appropriate form of development. Whilst the Mayor supports the strategy for tall buildings put forward, the level of detail provided within the draft document is not considered appropriate for inclusion within a Supplementary Planning Document in the absence of a formal policy basis. As per the requirements of Policy D9, such a strategy should have the benefit of being included within a formal DPD and thus the subject of a full examination process to ensure that it is afforded full weight in planning decisions and is</p>	<p>Meeting with the GLA held Jan 2023 and changes agreed. New local definition removed, and text included to confirm guidance will be incorporated into draft Local Plan.</p>
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					therefore effectively implemented.	
19	GLA	Comment	4	Guiding principle 10: Tall building definition and height strategy	Rather than attempting to introduce new policy criteria, the SPD presents an opportunity to highlight the conflict between your existing Local Plan and LP2021, and to clarify how the new approach set out by LP2021 Policy D9 is to be brought forward into your DPD as part of your next Local Plan review process.	Meeting with the GLA held Jan 2023 and changes agreed. New local definition to be removed, and text included to confirm guidance will be incorporated into draft Local Plan.



19	GLA	Comment	4	Guiding principle 10: Tall building definition and height strategy	It is therefore recommended that the more problematic elements of the draft SPD discussed are migrated across into the draft Local Plan and consulted upon as part of your regulation 19 process. The general presumption that the SPD area contains a 'strong rationale' for tall buildings as set out within the ELAAP may still be referred to and strengthened within the SPD for clarity.	Meeting with the GLA held Jan 2023 and changes agreed. New local definition to be removed, and text included to confirm guidance will be incorporated into draft Local Plan.
19	GLA	Comment	4	Guiding principle 10: Tall building definition and height strategy	Subject to the removal of the more authoritative elements of guiding principle 10 and associated figures, the draft SPD is welcomed and represents a major contribution towards a plan-led approach to good growth in the borough. This would include the more general design requirements for tall buildings developments within the draft SPD which act to guide the implementation of, for instance, ELAAP policy EL11 (Building form at Meridian Water).	Noted.

19	GLA	Comment	4	Guiding principle 10: Tall building definition and height strategy	It is also noted that prior to the formal adoption of the new Local Plan, decision makers may justifiably place weight upon the emerging local plan policies and associated evidence base (e.g. Character and Growth Study) as these clearly indicate the direction of travel for future policy.	Noted, though the draft Reg 18 Local Plan was consulted upon during summer 2021, meaning it is at a relatively early stage of preparation and as such as relatively little weight in decision making.
19	GLA	Comment	4	General	London Plan policy D12 seeks the highest standards in fire safety. The draft Fire Safety London Plan Guidance requires developers to provide a rigorous assessment of the number of stair cores provided based on factors such as the proposed evacuation strategy, the height of the building, the number of fire evacuation lifts, and the anticipated number of occupants and to include clear mitigation measures, where required, to ensure safe evacuation in the event of an emergency. Following the Grenfell Fire, increasingly occupants are choosing to self-evacuate during fire incidents even where a stay put evacuation strategy is in place. This change in behaviour needs to be considered when developing the fire strategy for tall residential buildings	New text included as part of 4.44 as suggested.

					and robust design solutions incorporated into tall buildings. The issue of fire safety that arises by provision of single staircase in tall buildings should be addressed appropriately in the draft SPD as noted in the NFCC statement on 14th December 22. The draft should require adherence to current and future fire safety regulations and refer to draft London Plan Guidance on fire safety.	
19	GLA	Comment	4	Guiding principle 9: Managing transitions	The SPD acknowledges the scope for conflict between the various uses which Guiding Principle 9 addresses to some degree. However, an explicit reference within the SPD to locating buffer uses within the masterplan area where this lies adjacent to waste and industrial sites, as opposed to within the adjacent SIL, LSIS and waste sites, would help in ensuring the effective	Suggested wording added to 4.77.

					operation and functioning of adjacent waste and industrial uses.	
20	Lee Valley Regional Park Authority	Support	3.1	Vision and objectives	The Authority supports the Vision concept for the Meridian Water Western Bank as a highly sustainable mixed use community. The emphasis placed on “improved and restored waterways and new open space” within the Western Bank to “knit this new community” into the Regional Park will be important to ensure sufficient space of good quality and variety is provided to meet the needs of new residents and employees.	Noted
20	Lee Valley Regional Park Authority	Comment	3	Vision	The Vision statement should make reference to the creation of Brooks Park and indeed its possible extension westwards within the former Ikea site. Its waterside location and proximity to the Regional Park at Tottenham Marshes offers significant opportunities for leisure and	The Vision statement needs to be succinct; it currently refers to waterway improvements and the green network, with further details provided by the guiding principles.

					recreation on a meaningful scale.	
20	Lee Valley Regional Park Authority	Comment	3.1	Objectives	The open spaces within the Regional Park are under increasing recreational pressure from new users or visitors due to the level of growth planned or currently being developed along its boundaries. It is fundamental to the quality of the new communities such as MWWB, and the wider environment benefits of the Regional Park that new development and co-ordinated regeneration of areas such as Meridian Water create spaces for people's enjoyment, leisure and well-being from the outset as an integral part of the areas transformation.	Noted
20	Lee Valley Regional Park Authority	Support	3.1	Objectives	The objectives highlight the need for the MWWB to connect to and celebrate the Lee Valley Regional Park, and to enhance blue/green networks, and this is welcomed. But equally more detail is required as to how the MWWB will create and embrace new areas of public open	The SPD sets out guidance on the creation of the green network, including the Green Loop. The detailed design and management of these elements will be established through the Development Management process.

					green space within its own site boundary, and how these will be safeguarded and managed as a sustainable resource for the long term.	
20	Lee Valley Regional Park Authority	Comment	3.1	Objectives	Objective 4 which is focused on delivering sustainable regeneration starts to address this where it identifies the need to “Ensure an uplift in biodiversity across the site through the provision of new multifunctional green spaces linking to existing green networks, and naturalisation and restoration of watercourses”. Substantial areas will need to be provided within the MWWB to provide sufficient room for both biodiversity and recreational/leisure needs. Connecting this ‘scale’ of resource with the Regional Park’s spaces and habitats will contribute positively to placemaking at MWWB extending the Park into the Western Bank.	Noted
20	Lee Valley Regional Park	Support	4	Guiding principle 1: Movement and	The emphasis on active travel is supported.	Noted

	Authority			connectivity		
20	Lee Valley Regional Park Authority	Comment	4	Guiding principle 1: Movement and connectivity	The design of development proposals should place the highest priority on walking and cycling particularly within the street network, public realm and open spaces. However, there is also a need to integrate and connect the Western Bank with its surroundings and this should include the Regional Park. The SPD guidance identifies the new links needed to connect with the surrounding area including foot and cycle links over the railway in the west, from Main Street which runs through the centre of the Western Bank site and via bridges (for cyclists, buses and pedestrians) over the Lee Navigation, Pymmes and Salmons Brooks.	Noted. The Guiding Principle 1 makes explicit reference to connections to Lee Valley Regional Park.
20	Lee Valley Regional Park Authority	Support	4	Guiding principle 1: Movement and connectivity	Connections from Main Street, the central route from the station through to the rest of Meridian Water are welcome – they will enable people to access Edmonton Marshes in the Park and move onto the Lee Navigation towpath to travel north and south further into the Park, connecting with key venues such as	Noted

					the Lee Valley Leisure Complex at Pickett's Lock and Walthamstow Wetlands.	
20	Lee Valley Regional Park Authority	Comment	4	Guiding principle 1: Movement and connectivity	Supporting text references the importance of bridge crossings as high quality placemaking features sympathetic to the waterways beneath especially where these form part of the canal edge or towpath. This detail should form part of the formal guidance under GP1 – the Navigation and its towpath form part of the Regional Park in Enfield and the SPD shows at least 3 crossings over the Navigation; Guidance should consider the cumulative impact of these crossings particularly in terms of their visual and ecological impact on the waterway corridor.	Relevant text moved into Guiding Principle 1 at part 6. Cumulative impact point addressed in amended wording at para 4.7.
20	Lee Valley Regional Park Authority	Comment	4	Guiding principle 1: Movement and connectivity	The SPD also needs to address links south onto Tottenham Marshes. This would need to come forward as part of the improvements to Leaside Road, a key east west connecting route along the southern boundary of the Western Bank identified under	Links to Tottenham Marshes referenced in new point 5 f of Guiding Principle 1.



					the guidance to be enhanced as part of development.	
20	Lee Valley Regional Park Authority	Comment	4	Guiding principle 1: Movement and connectivity	Leeside Road is an important point of access into Tottenham Marshes via the existing Leeside footbridge and the future of this connection remains unclear. This matter was raised in the Authority's response to the reserved matters application for residential led redevelopment of the former Gasholder Site off Leeside Road, Plot Z02-01 of Phase 2 (our ref: RP/61/22). The SPD should support the creation of a safe and attractive gateway or access point into the Regional Park at this point and provide guidance to secure this improvement as part of development and infrastructure proposals linked to the public realm interventions.	Reference made at para 4.5.

20	Lee Valley Regional Park Authority	Support	4	Guiding principle 3: Blue and green infrastructure network	<p>The content of Guiding Principle 3 Blue and Green Infrastructure Network is supported. The emphasis on enhancing biodiversity and maximising opportunities for nature recovery is welcomed and reference to the Lee Valley Biodiversity Action Plan is helpful as the Authority would wish to see habitat creation and native planting within MWWB that complements the adjoining Park areas. The Authority supports the Council in seeking to achieve a 10% Biodiversity Net Gain and would encourage this to be the minimum sought through development given the likely low base from which this assessment will be calculated. Guidance should specify that the BNG will need to be provided on site within the MWWB.</p>	<p>Guiding Principle 3 part 2 references 10% as a minimum. Part 2 amended to flag the expectation that this should be provided on site.</p>
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20	Lee Valley Regional Park Authority	Comment	4	Guiding principle 3: Blue and green infrastructure network	<p>Guidance also proposes that new spaces and habitats should be designed to link up with existing green and blue assets and connect with existing Sites of Importance for Nature Conservation (SINCs). In principle this is supported, although Guidance should be clear that this would include the River Lee Navigation Site of Metropolitan Importance for Nature Conservation (SMINC). The Authority's PDF Biodiversity Area Proposals 4.A.2 highlight the importance of habitat creation to strengthen ecological connectivity between the reservoir Site of Special Scientific Interest, i.e. William Girling in the north and the waterway and open grassland habitat on Tottenham Marshes. Proposals also seek to ensure that "New waterside space proposed alongside the River Lee Navigation in the Meridian Water Masterplan should include appropriate waterside habitat creation to aid establishment of an ecological corridor"</p>	Supporting text 4.26 amended to explicitly reference the River Lee Navigation Site of Metropolitan Importance for Nature Conservation (SMINC)
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20	Lee Valley Regional Park Authority	Comment	4	Guiding principle 3: Blue and green infrastructure network	Making these landscape scale connections between MWWB and sites beyond its boundary is important but this will require careful design and management of habitats and biodiverse features provided as part of development to ensure the same spaces do not face unsustainable pressure from recreation/leisure use that devalues biodiversity.	Noted.
20	Lee Valley Regional Park Authority	Comment	4	Guiding principle 3: Blue and green infrastructure network	The waterway corridors and associated waterside open space within MWWB are an example. Guidance identifies these features as part of the Green Loop, a continuous linear park with an optimum width of 20 to 30 metres which loops through the heart of Meridian Water providing open space, pedestrian footway and two way cycle route and other amenities. The design and long term management of this feature will require careful consideration to ensure a biodiversity function can succeed. Proposals for the extension of the Lee Navigation linear open space as a north south movement corridor for people and spill out area for public activity relating to adjacent	The role of the River Lee Navigation Open Space made clearer - see additional supporting text at 4.28.

					development and creation of a new public 'Riverside Square' part of the proposed Town Centre, is also unlikely to offer much biodiversity value in the long term. Guidance needs to be clear as to the primary role of the waterways and how the various demands can be balanced.	
20	Lee Valley Regional Park Authority	Support	4	Guiding principle 3: Blue and green infrastructure network	The requirement for development to reduce flood risk through sustainable and natural flood risk management is supported. The naturalisation and de-culverting of Pymmes Brook would be welcome, although as stated in the SPD this would require detailed feasibility work.	Noted

20	Lee Valley Regional Park Authority	Comment	4	Guiding principle 3: Blue and green infrastructure network	<p>It is understood that as part of the creation of Brooks Park a section of Pymmes Brook will be naturalised and this is identified as a project within the Infrastructure Delivery Plan included in the SPD. The Authority's previous comments on this proposal (in its response to the Gas Holder application) sought the inclusion of channel softening alongside the development's boundary with Pymmes Brook. It was suggested that floating reedbeds and Sand Martin nest holes might be incorporated as part of these softening works. It is understood that proposals for channel softening are being discussed with the EA.</p>	Noted. Ongoing discussions are continuing.
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20	Lee Valley Regional Park Authority	Comment	4	Guiding principle 4: Sustainable construction management	<p>Guidance needs to be included on lighting, and an additional Guidance Principle should be added, in particular to ensure sensitive lighting schemes are considered as an integral part of development and to ensure developments avoid light pollution.</p> <p>This will be of particular relevance where development overlooks the waterways such as the Lee Navigation and open spaces such as Brooks Park and Tottenham Marshes, and where maintaining dark corridors and spaces are important for biodiversity. The 'Institute of Lighting Professionals (2018) Bats, and Artificial Lighting in the UK Guidance Note 08/18' should be used to inform development and lighting strategies.</p> <p>Lighting is a matter that should also be covered in guidance relating to Sustainable Construction Management under GP 4. Construction Environmental Management Plans will be an important mechanism for minimising disturbance within the adjoining areas of the Park, particularly given that development within the Western Bank will be phased over a lengthy</p>	<p>Additional point regarding lighting considerations added to Guiding Principle 4 part f.</p> <p>Additional point on lighting added to Guiding Principle 9 at point 5, with associated supporting text added at 4.76.</p>
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					period of time.	
20	Lee Valley Regional Park Authority	Comment	4	Guiding principle 8: Social infrastructure	Reference under GP 8 'Social Infrastructure Provision' to the provision of flexible indoor and outdoor sports and leisure facilities is noted. Guidance should make reference to the facilities within the adjoining areas of the Regional Park, such as the Athletics Centre at Pickett's Lock and future sports and recreational provision on Edmonton Marshes. Complementary provision and programmes should be	Additional text added accordingly to paragraph 4.72.



					encouraged.	
20	Lee Valley Regional Park Authority	Comment	4	Guiding principle 10: Tall building definition and height strategy	The guidance on tall building should allow for a considerable reduction in height where buildings are positioned adjacent or close to the Regional Park, in particular Tottenham Marshes in the south and alongside the River Lee Navigation in the east. The Authority's Landscape Strategy and proposals seek the restoration of poor quality and fragmented landscape character, protecting and enhancing the openness of the valley floor to the north and south of the North Circular. In respect of Tottenham Marshes (Landscape Character Area (LCA) C2) the Landscape Strategy notes "Where tall buildings begin to intrude on views and diminish the sense of scale and openness that the marshland has, this affects the sense of the area as a semi-natural space, removed from and providing a break between busy urban areas that abut it". The strategy states that	Extant planning consents establish heights close to LVRP boundary. The height strategy steers tall buildings away from peripheral locations to the station/ town centre.

					areas where open skylines predominate should be protected.	
20	Lee Valley Regional Park Authority	Comment	4	Guiding principle 10: Tall building definition and height strategy	The Lee Navigation falls within LCA F1 'Peri-urban Valley Floor'. Strategy Guidelines state "Ensure any future development protects existing valued features and enhances the landscape framework across the area - it should demonstrate careful design that integrates development physically, visually and functionally into the wider LVRP landscape".	Noted

20	Lee Valley Regional Park Authority	Comment	4	Guiding principle 10: Tall building definition and height strategy	<p>An additional guidance point 3 should be added under GP10 to reflect the above Strategy – the following wording is suggested for consideration: Guiding principle 10 Tall Building definition and height strategy</p> <p>3. The height of buildings positioned close to the Regional Park should step down towards the Park in particular the open spaces at Tottenham Marshes and alongside the River Lee Navigation respecting and announcing the transition to areas of open space and the waterside environment, enabling views out across the Lee Valley to be retained and enhanced.</p>	<p>Extant planning consents establish heights close to LVRP boundary. The height strategy steers tall buildings away from peripheral locations to the station/ town centre.</p>
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20	Lee Valley Regional Park Authority	Comment	5.2	Ravenside Retail Park	<p>A number of the points raised above will be relevant to future development within the Ravenside Retail Park area, identified as a key site within the SPD and located adjacent to the River Lee Navigation. The specific 'high level' guidance currently included references the need to:</p> <p>“Activate the waterside setting, and incorporate elements of the green network, including the Green Loop and Lee Navigation Linear Open Space”</p> <p>This guidance is supported but the level of activation will need to consider the location of the site adjacent to the River Lee Navigation and balance other requirements such as provision for biodiversity, sensitive lighting, and safe routes for people as part of the Green Loop.</p>	Need for balance emphasised through additional supporting text at 4.28.
20	Lee Valley Regional Park Authority	Support	6	Infrastructure Delivery	<p>The wide range of infrastructure identified in the SPD is noted and the detail of the site related infrastructure requirements is helpful in understanding the level of detail still to come in terms of securing green and blue infrastructure, bridge links and pedestrian and cycle routes that will connect the Meridian</p>	Noted

					Water Western Bank with the Regional Park and deliver substantial new public open space within the Park's boundaries.	
20	Lee Valley Regional Park Authority	Comment	6	Infrastructure Delivery	The Authority should be consulted on these elements to ensure new green networks and open spaces are complementary to the Park's open spaces and recreational offer and the Authority's aims and future aspirations for the Regional Park. The detail of physical links, pathways and cycle routes between MWWB and the Park need to be agreed with the Authority to ensure a co-ordinated access and wayfinding strategy for the whole SDP area. This is important if funding and delivery is likely to be triggered by the development on a plot by plot basis and secured via developer contributions (S106 or Community Infrastructure Levy) or direct provision by developers.	Engagement with the Lee Valley Regional Park Authority will continue as detailed proposals for sites are brought forward.

20	Lee Valley Regional Park Authority	Comment	6	Infrastructure Delivery	<p>Included within the site related infrastructure category are the Green and Blue Infrastructure elements referred to in the SPD Guiding Principle 3, such as the Green Loop which will include improved access to the Regional Park and is intended to deliver biodiversity and flood attenuation. The trigger for these elements will be development on Phase 2 sites – Ikea, Tesco and the Ravenside Retail Park and the Authority should be involved in the detail of these infrastructure elements as early as possible in the development process to ensure they are complementary to the adjoining Park areas and improve connectivity and biodiversity. A similar course of action is required for the proposed pedestrian and cycle bridge crossings over the Lee Navigation and Pymmes Brook at Leaside.</p>	<p>Engagement with the Lee Valley Regional Park Authority will continue as detailed proposals for sites are brought forward.</p>
20	Lee Valley Regional Park Authority	Comment	6	Infrastructure Delivery	<p>The Authority would welcome further discussion on these matters particularly as the detail of some infrastructure designs and works are progressing and would welcome the opportunity to engage further on the detail of guidance contained within the SPD as it is amended following</p>	<p>Noted</p>

					this consultation.	
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## Enfield Equality Impact Assessment (EqIA)

### Introduction

The purpose of an Equality Impact Assessment (EqIA) is to help Enfield Council make sure it does not discriminate against service users, residents and staff, and that we promote equality where possible. Completing the assessment is a way to make sure everyone involved in a decision or activity thinks carefully about the likely impact of their work and that we take appropriate action in response to this analysis.

The EqIA provides a way to systematically assess and record the likely equality impact of an activity, policy, strategy, budget change or any other decision.

The assessment helps us to focus on the impact on people who share one of the different nine protected characteristics as defined by the Equality Act 2010 as well as on people who are disadvantaged due to socio-economic factors. The assessment involves anticipating the consequences of the activity or decision on different groups of people and making sure that:

- unlawful discrimination is eliminated
- opportunities for advancing equal opportunities are maximised
- opportunities for fostering good relations are maximised.

The EqIA is carried out by completing this form. To complete it you will need to:

- use local or national research which relates to how the activity/ policy/ strategy/ budget change or decision being made may impact on different people in different ways based on their protected characteristic or socio-economic status;
- where possible, analyse any equality data we have on the people in Enfield who will be affected e.g. equality data on service users and/or equality data on the Enfield population;
- refer to the engagement and/ or consultation you have carried out with stakeholders, including the community and/or voluntary and community sector groups you consulted and their views. Consider what this engagement showed us about the likely impact of the activity/ policy/ strategy/ budget change or decision on different groups.

The results of the EqIA should be used to inform the proposal/ recommended decision and changes should be made to the proposal/ recommended decision as a result of the assessment where required. Any ongoing/ future mitigating actions required should be set out in the action plan at the end of the assessment.

## Section 1 – Equality analysis details

<b>Title of service activity / policy/ strategy/ budget change/ decision that you are assessing</b>	Meridian West Supplementary Planning Document
<b>Team/ Department</b>	Plan Making Team, Strategic Planning and Design   Planning Service, Place Department
<b>Executive Director</b>	Sarah Cary
<b>Cabinet Member</b>	Cllr Nesil Caliskan
<b>Author(s) name(s) and contact details</b>	Lachlan Anderson-Frank MRTPI, Principal Planner <a href="mailto:Lachlan.anderson-frank@enfield.gov.uk">Lachlan.anderson-frank@enfield.gov.uk</a>  Edward Jones MRTPI, Principal Planner <a href="mailto:Edward.jones@enfield.gov.uk">Edward.jones@enfield.gov.uk</a>
<b>Committee name and date of decision</b>	Cabinet, 7 <sup>th</sup> June 2023
<b>Date the EqIA was reviewed by the Corporate Strategy Service</b>	13 <sup>th</sup> April 2023
<b>Name of Head of Service responsible for implementing the EqIA actions (if any)</b>	Helen Murch
<b>Name of Director who has approved the EqIA</b>	

The completed EqIA should be included as an appendix to relevant EMT/ Delegated Authority/ Cabinet/ Council reports regarding the service activity/ policy/ strategy/ budget change/ decision. Decision-makers should be confident that a robust EqIA has taken place, that any necessary mitigating action has been taken and that there are robust arrangements in place to ensure any necessary ongoing actions are delivered.

## Section 2 – Summary of proposal

Please give a brief summary of the proposed service change / policy/ strategy/ budget change/project plan/ key decision

**Please summarise briefly:**

What is the proposed decision or change?

What are the reasons for the decision or change?

What outcomes are you hoping to achieve from this change?

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Who will be impacted by the project or change - staff, service users, or the wider community?

This EqIA covers the implications with regards to public sector Equalities Duty of adopting the Meridian West Supplementary Planning Document (MW SPD). A supplementary planning document (defined in the Town and Country Planning Regulations 2012) provides detailed guidance on the policies set out in the adopted development plan, including Enfield's Core Strategy and the Edmonton Leaside Area Action Plan (ELAAP). The SPD has been produced to guide development and investment in the future of the Meridian Water West Bank area.

Meridian Water is a Council priority regeneration project, and it is the Borough's largest residential led mixed-use development project. There is a very significant opportunity for transformational change here through mixed use development, following the opening of the new Meridian Water station in 2019. The purpose of the SPD is: to ensure coordinated development, facilitate the delivery of a comprehensively planned area and provide greater guidance to facilitate high quality design, infrastructure provision and placemaking to secure maximum benefits for the wider community, under the planning framework provided by ELAAP.

SPD has been prepared to ensure the vision for high quality development as set out in ELAAP is achieved at Meridian West. To this end it sets out the placemaking principles and parameters of development as well as the environmental, physical and social infrastructure requirements in order to achieve this vision which will be expected from development proposals.

## Section 3 – Equality analysis

This section asks you to consider the potential differential impact of the proposed decision or change on different protected characteristics, and what mitigating actions should be taken to avoid or counteract any negative impact.

According to the Equality Act 2010, protected characteristics are aspects of a person's identity that make them who they are. The law defines 9 protected characteristics:

1. Age
2. Disability
3. Gender reassignment.
4. Marriage and civil partnership.
5. Pregnancy and maternity.
6. Race
7. Religion or belief.
8. Sex
9. Sexual orientation.

At Enfield Council, we also consider socio-economic status as an additional characteristic.

“Differential impact” means that people of a particular protected characteristic (e.g. people of a particular age, people with a disability, people of a particular gender, or people from a particular race and religion) will be significantly more affected by the change than other groups. Please consider both potential positive and negative impacts and provide evidence to explain why this group might be particularly affected. If there is no differential impact for that group, briefly explain why this is not applicable.

Please consider how the proposed change will affect staff, service users or members of the wider community who share one of the following protected characteristics.

**Detailed information and guidance on how to carry out an Equality Impact Assessment is available [here](#). (link to guidance document once approved)**

### Age

This can refer to people of a specific age e.g. 18-year olds, or age range e.g. 0-18 year olds.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people of a specific age or age group (e.g. older or younger people)? Please provide evidence to explain why this group may be particularly affected.

Enfield has relatively high proportions of children and young people under the age of twenty – higher than both London and England averages. The percentage of younger adults - aged 20 to 44 years - is also higher than in England in general, but below that of London as a whole. Both the London area and Enfield have proportionately fewer older residents than the England average. The Edmonton Green Ward in which the SPD sits has a lower mean age (31.6) at the 2011 census than the average for Enfield (35.9).

The proposed changes are expected to have a positive impact on all age groups due to the opportunities that will be provided to residents for housing and jobs through the regeneration of the area. In addition, air pollution presents health risks, in particular for young children and elderly people. Therefore, the environmental advantages of the proposed SPD (reducing pollution from road traffic, increasing blue and green spaces, etc) would be expected to have a positive impact on these groups. No negative impacts on protected age groups are anticipated.

### Mitigating actions to be taken

To ensure that the public sector Equality Duty is met, new housing proposals will be required to meet accessibility standards as set out in local and national planning guidance. The SPD also advocates for the delivery of significant new public services and social infrastructure including new schools and community spaces and a health centre, taking into account the needs of different age groups across the wider community including existing residents of surrounding neighbourhoods.

### Disability

A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on the person's ability to carry out normal day-day activities. This could include: physical impairment, hearing impairment, visual impairment, learning difficulties, long-standing illness or health condition, mental illness, substance abuse or other impairments.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people with disabilities? Please provide evidence to explain why this group may be particularly affected.

At the 2021 Census, 44,900 Enfield residents (13.6% of the total) reported a long-term health problem or disability in response to the question, “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?”. Respondents were invited to indicate the level to which their activities were limited. 7.2% of people have their day to day activities limited a little, 6.4% have them limited a lot. The proposed changes are not expected to negatively impact on those with a disability. New development, including the public realm and public spaces, will be designed to accessibility requirements set out in the development plan, helping to ensure residents of all abilities are not excluded.

**Mitigating actions to be taken**

To ensure that the Public Sector Equality Duty is met, new housing proposals will be required to meet accessibility standards as set out in local and national planning guidance. Similarly accessible parking including Blue Badge places should be provided in line with London Plan guidance. The SPD also supports the provision of accessibly designed public spaces.

### Gender Reassignment

This refers to people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on transgender people?

Please provide evidence to explain why this group may be particularly affected.

The 2021 census showed that 1.1% of residents aged 16+ have a gender identity different from sex registered at birth. The proposals in the MW SPD are not expected to differentially impact on this protected group.

### Mitigating actions to be taken

New public buildings and spaces with public washrooms within the area covered by the MW SPD will need to be designed in line with London Plan Guidance around gender neutral toilets. The London Plan 2021 states that “Where gender-specific toilets are provided, a gender-neutral option should also be provided wherever possible (in addition to unisex disabled persons toilets)”.

### Marriage and Civil Partnership

Marriage and civil partnerships are different ways of legally recognising relationships. The formation of a civil partnership must remain secular, where-as a marriage can be conducted through either religious or civil ceremonies. In the U.K both marriages and civil partnerships can be same sex or mixed sex. Civil partners must be treated the same as married couples on a wide range of legal matters.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people in a marriage or civil partnership?

Please provide evidence to explain why this group may be particularly affected.

The proposals are not expected to have an impact on those who are married or in a civil partnership.

### Mitigating actions to be taken

None.



### Pregnancy and maternity

Pregnancy refers to the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on pregnancy and maternity?

Please provide evidence to explain why this group may be particularly affected.

The proposals are not expected to have a negative impact on those who are pregnant or in the maternity period.

There is a growing body of evidence that links maternal exposure to air pollution and adverse pregnancy outcomes such as miscarriage, low birth weight and pre-term birth.<sup>1</sup> In seeking to control air quality impacts during construction, and more broadly manage the impacts of heavily trafficked streets on future residents, as well as provide more green spaces, the proposals seek to effectively control air pollution which is expected to positively impact on all residents, including those who are pregnant who are more vulnerable to the negative impact of air pollution

### Mitigating actions to be taken

None.

### Race

This refers to a group of people defined by their race, colour, and nationality (including citizenship), ethnic or national origins.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people of a certain race?

Please provide evidence to explain why this group may be particularly affected.

Based on Enfield's own estimates, residents from White British backgrounds make up 35.3% of Enfield's inhabitants with other White groups (including White Irish) combined at 26.4%. Mixed Ethnic Groups account for 5.5%, Asian Groups for 11.0% and Black groups for 17.9% of Enfield's population. In the Edmonton Ward where

<sup>1</sup> Royal College of Obstetricians and Gynaecologists, [Outdoor air pollution and pregnancy in the UK](#), June 2021  
EqIA template approved by EMT 16 June 2020

the MW SPD is located, the estimates in 2011 were 39.4% white groups.

Residents from a Black ethnic background are disproportionately affected by homelessness. In 2020/21, 35% of households in Enfield owed a homelessness prevention or relief duty were from a Black or Black British ethnic background, higher than London (30%) and England averages (10%). Residents from Black ethnic groups make up 18% of the population. The SPD seeks to facilitate a significant increase in the delivery of housing, including affordable housing, so a positive impact is anticipated.

National statistics highlight that unemployment is higher among people from ethnic minority backgrounds.<sup>2</sup> In facilitating the provision of a range of workspaces and a new town centre, it is anticipated the SPD will have a positive effect on communities disproportionately affected by unemployment.

National research highlights inequality in access to green space. National research highlights inequalities in access to green space. A survey carried out by walking charity Ramblers and YouGov in 2020 found that people who identify as being from a Black, Asian or minority ethnic background (39%) are less likely to live within a 5-minute walk of a green space than people from White ethnic backgrounds (58%). People from Black, Asian or minority ethnic backgrounds (46%) also reported being less likely to have a variety of different green spaces within walking distance of where they live than people from White ethnic backgrounds (58%). As the SPD seeks to deliver new green spaces, facilitate the restoration and naturalisation of waterways, and overall increase access to blue and green spaces, a positive effect is anticipated.

#### **Mitigating actions to be taken**

Information on ethnicity shows that there is a high proportion of people from ethnic minority groups living in the area, although the specific area covered by the SPD does not have any current residents (except new residents moving into the area who are unlikely to be counted in current statistics). Whilst development proposals set out in the MW SPD will serve a higher ethnically diverse population, there is nothing in the SPD that is expected to disadvantage one group over another. Positive impacts with regards to housing, employment, and access to blue and green spaces are set out above.

<sup>2</sup><https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/datasets/labourmarketstatusbyethnicgroupa09>

### Religion and belief

Religion refers to a person's faith (e.g. Buddhism, Islam, Christianity, Judaism, Sikhism, Hinduism). Belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who follow a religion or belief, including lack of belief?

Please provide evidence to explain why this group may be particularly affected.

82% of residents in the Edmonton Green Ward had a religion in 2011, higher than the average for Enfield of 77%. Of these, 29% were Muslim, almost double the rate in Enfield (17%). The SPD supports the provision of community facilities to meet the needs of a growing population, including places of worship.

### Mitigating actions to be taken

The SPD is not expected to have a negative impact on people who follow a religion or belief. A positive impact in terms of provision of places of worship is anticipated.

### Sex

Sex refers to whether you are a female or male.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on females or males?

Please provide evidence to explain why this group may be particularly affected.

According to Census 2021 data, 52% of Enfield's population is estimated to be female and 48% male.<sup>3</sup>

The ONS Opinions and Lifestyle Survey asks people about their current perceptions of safety and their experiences of safety in the last 12 months. The survey asks respondents if they feel safe walking alone in a quiet street close to your home; in a busy public space such as a high street; in a park or other open space; and using public transport on your own. According to data from March 2022, across all settings both during the day and at night, a higher proportion of women reported feeling very or fairly unsafe compared with men.

The SPD supports the provision of active, well surveilled streets to create a safe public realm. This is expected to positively impact on all residents, in particular women who are more likely to report feeling unsafe walking alone.

### Mitigating actions to be taken

<sup>3</sup> ONS, [Population and household estimates, England and Wales: Census 2021](#)  
EqIA template approved by EMT 16 June 2020

There is nothing in the proposed development that will benefit or disadvantage either group over the other. As set out above, a positive impact in terms of women's safety is identified.

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### Sexual Orientation

This refers to whether a person is sexually attracted to people of the same sex or a different sex to themselves. Please consider the impact on people who identify as heterosexual, bisexual, gay, lesbian, non-binary or asexual.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people with a particular sexual orientation?

Please provide evidence to explain why this group may be particularly affected.

The 2021 census showed that 88.1% of Enfield's population identified as heterosexual or straight. Of residents who do not identify as straight or heterosexual:

- 0.9% identified as gay or lesbian
- 0.8% identified as bisexual
- 0.5% identified another sexual orientation

### Mitigating actions to be taken

There is nothing in the proposed development that is expected to benefit or disadvantage any group over another. No impacts are expected under this protected characteristic.

### Socio-economic deprivation

This refers to people who are disadvantaged due to socio-economic factors e.g. unemployment, low income, low academic qualifications or living in a deprived area, social housing or unstable housing.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who are socio-economically disadvantaged?

Please provide evidence to explain why this group may be particularly affected.

According to research undertaken by Transport for London in 2019, the most commonly used form of transport for Londoners with lower household incomes (below £20,000) is walking. The bus is the next most commonly used form of transport with 69% of people with lower household incomes taking the bus at least once a week compared to 59% of all Londoners. The Edmonton wards have a higher proportion of residents on lower incomes. Investment in active travel would therefore be expected to have a positive impact as it will make walking and cycling more convenient and safer, alongside good public transport routes.

Health inequalities are more pronounced in deprived communities. Healthy life expectancy in Upper Edmonton (which encompasses the SPD area) is lower than for more affluent wards. The SPD seeks to improve blue and green spaces and facilities the provision of a green network, as well as create new active travel routes. A positive impact is anticipated in terms of physical and mental health and wellbeing.

Unemployment in the Edmonton wards is higher than the borough average – 8.2% in Upper Edmonton and 9.6% in Edmonton Green. The SPD supports an increase in employment through the provision of new workspaces, which is expected to provide job opportunities for local people and support an economy that works for everyone.

The SPD seeks to support low carbon climate-resilient development. The delivery of energy efficient homes is expected to benefit low income households experiencing fuel poverty.

**Mitigating actions to be taken.**

There is nothing in the proposed SPD that will negatively impact on socio-economic deprivation. Positive impacts, as set out above, are expected under this protected characteristic.

## Section 4 – Monitoring and review

How do you intend to monitor and review the effects of this proposal?

Who will be responsible for assessing the effects of this proposal?

The implementation of the guidance in the SPD will be monitored by the local planning authority as part of the Annual Monitoring Report.

In addition, the project is also subject to governance processes linked to infrastructure funding from the Greater London Authority and the Department of Levelling Up through relevant funding programmes.

As a result, there is extensive governance at officer level around the development and its impacts on residents of Enfield.

## Section 5 – Action plan for mitigating actions

Any actions that are already completed should be captured in the equality analysis section above. Any actions that will be implemented once the decision has been made should be captured here.

Identified Issue	Action Required	Lead officer	Timescale/By When	Costs	Review Date/Comments





### London Borough of Enfield

<b>Report Title</b>	Homelessness in Enfield (5) – Housing residents where accommodation is affordable
<b>Report to:</b>	Cabinet
<b>Date of Meeting:</b>	7 June 2023
<b>Cabinet Member:</b>	Cllr Savva
<b>Directors:</b>	Sarah Cary, Executive Director Joanne Drew, Director of Housing and Regeneration
<b>Report Author:</b>	Richard Sorensen Richard.sorensen@enfield.gov.uk
<b>Ward(s) affected:</b>	all
<b>Key Decision Number</b>	KD 5625
<b>Implementation date, if not called in:</b>	17 June 2023
<b>Classification:</b>	Part I Public
<b>Reason for exemption</b>	N/A

#### Purpose of Report

1. This report proposes a new approach to maximise the opportunities for residents to secure affordable accommodation in the light of increased pressures on accessing temporary and affordable housing in the borough. This report seeks approval for a new service model and a revised Placement Policy.

## Recommendations

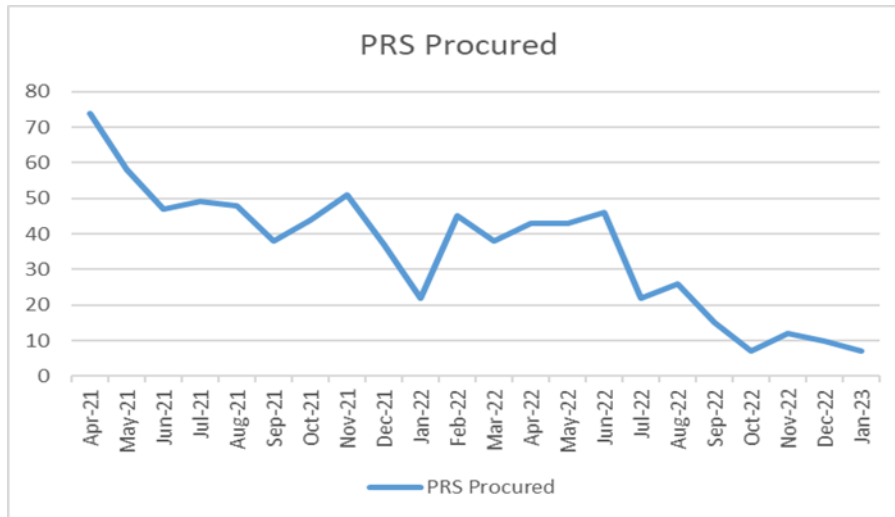
- I. Note the impact of current housing and welfare benefits policy on residents which is resulting in increased homelessness and residents in hotel accommodation for long periods of time.
- II. Agree the response which is to rehouse residents where rents and LHA levels converge maximising the choice that is available.
- III. Agree the new service model and communications with residents outlined in this report to address this. Delegate authority to the Director of Housing and Regeneration in consultation with the Cabinet Member for Social Housing to develop bespoke support arrangements consistent with the needs of residents and the local areas in which placements are made.
- IV. Approve the Placement Policy
- V. To maximise the available accommodation for those in most need, agree to request the Housing Gateway Board to revise its housing policy to offer new tenancies for a two year period at LHA rates and thereafter at market rent levels.
- VI. Agree to request the Housing Gateway Board to set rents at market rates for existing tenants from April 2024.

## Background and Options

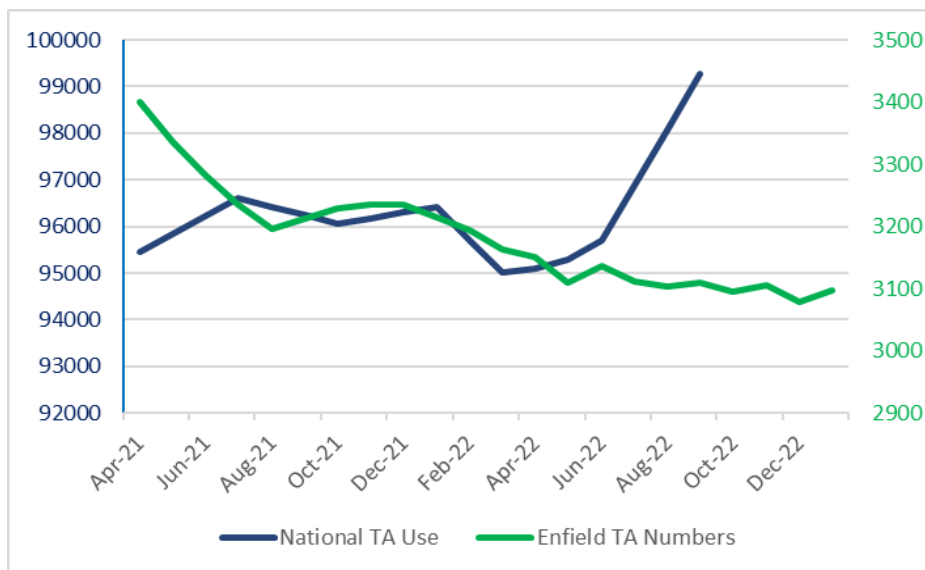
2. This report sets out the many reasons for the recommendations contained in it. By way of summary, but not exhaustively, the Council is experiencing unprecedented demand from residents losing their homes. This is at a time when the private rented sector is contracting, rents are rising and there is a severe shortage of affordable privately rented homes across the whole of the southeast of England.
3. This shortage of affordable accommodation means that few households have the financial capacity and opportunity to move out of temporary accommodation.
4. The supply of temporary accommodation has also fallen, and landlords are exiting the temporary accommodation market as they can gain higher returns through privately renting their properties.
5. The number of households being accommodated in hotels has risen to over two hundred and over 100 of these have been in hotels for more than six weeks.
6. The impact on families staying for extended periods in hotels is immense and this places extreme pressure on both the families and officers. Whilst this type of accommodation should only be for emergencies the reality is that it is being used for extended periods of time.
7. This is mirrored by the financial cost to the Council. Without action we project a £20m deficit for 2023-24, directly caused by the cost of hotel accommodation, the rising costs of existing leased temporary accommodation and the and the impact of the welfare system on temporary accommodation costs.
8. Market changes have been driven by central government policy which has led to a rapid decline in the supply of privately rented properties and a rise in rent levels. Research carried out by Savills (on behalf of Capital Letters last summer) suggested that rents had increased in Enfield by between 4% and 6%.

They also found that there had been a 42% reduction in the supply of private rented properties in Enfield over the last two years.

9. These figures match the experience of the Housing Advisory Service which rely on properties that can be rented at LHA levels so that they are affordable to residents. The supply of private rented properties at Local Housing Allowance (LHA) rents has reduced by 90% since April 2021 and 84% since April 2022. With LHA frozen at 2020 rates there is little prospect of an increase in supply of affordable private rented accommodation within the borough and the trend of landlords exiting the market is set to continue over 2023.

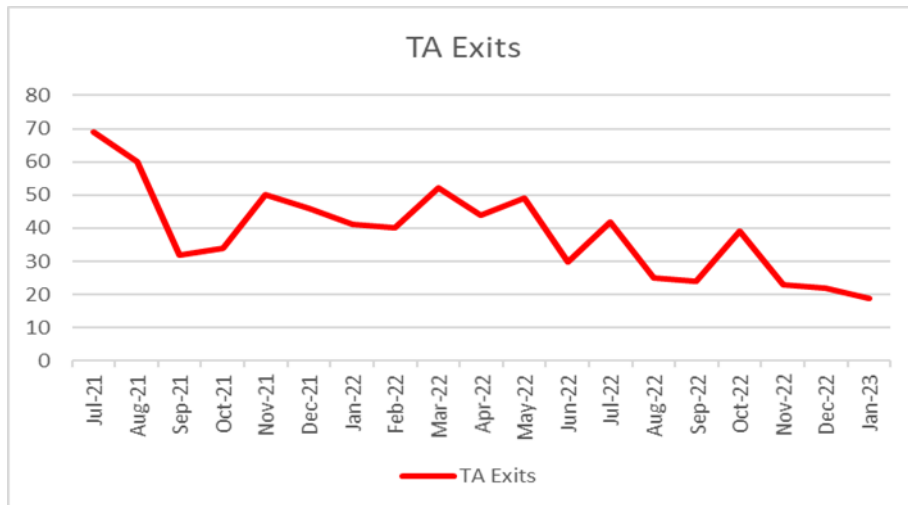


10. This challenge is happening at a national level and is reflected in both the number of homelessness approaches and the use of temporary accommodation. The effectiveness of our prevention activity has mitigated the impact in Enfield to some degree but nationally the use of temporary accommodation has risen from 95,000 households at the end of March 2022 to over 100,000 households – the highest figure for over 20 years..



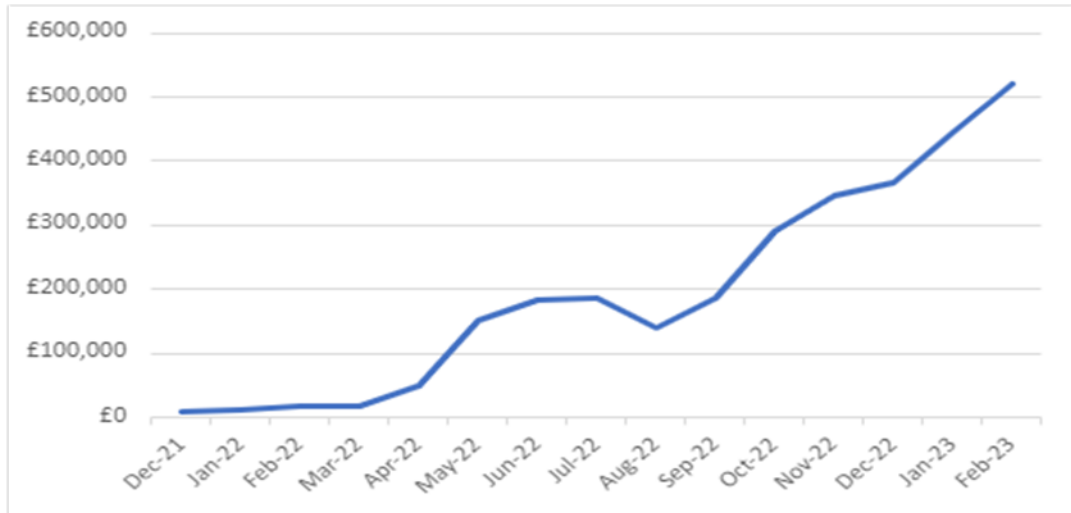
11. In Enfield, the number of households in temporary accommodation has remained relatively static at just under 3100 due to the focus of our service on prevention.

12. The number of Enfield households in temporary accommodation securing move on accommodation in the private rented accommodation has fallen in line with the supply. This is reflected in the number of households moving out of temporary accommodation.



13. This shortage of affordable private rented homes has meant that the service has not been able to achieve its targets in reducing the number of households in temporary accommodation.
14. The changes in the housing market have also impacted on the supply of temporary accommodation. Nightly paid accommodation is below Local Housing Allowance rent levels and so supply has also been impacted by the rise in rent levels. The portfolio of temporary accommodation has decreased. The effect of this is that whilst the overall number of households in temporary accommodation has not increased significantly so far, the shortfall in supply of self-contained accommodation has resulted in more households being accommodated in hotels. The lower numbers of households moving out of temporary accommodation has increased this pressure as this has increased the need for more temporary accommodation.
15. This shortage of temporary accommodation means that the service has been dependent on commercial hotels and shared accommodation in recent months. This is not suitable for residents, particularly those with children, for any length of time.

16. The chart below shows the financial spend on commercial hotels.



17. These pressures are not unique to Enfield and are being felt nationally. The problem is most acute in London and London Councils have been collating data from boroughs to monitor the effect of the current challenges. The table below shows the year-on-year changes to February 2023 across Greater London which demonstrates the pressures and inability to seek rehousing for residents across the wider London area.

Homelessness pressures

	February 2022	February 2023		Number of responses
Total number of homelessness presentations	5,545	5,592	+0.8% +47	23
Total number of households owed a prevention or relief duty	5,609	6,418	+14.4% +809	25
Total number of households in TA	47,961	50,168	+4.6% +2,207	25
Total number of Children in TA	61,128	63,418	+3.7% +2,290	21
Families in Bed and breakfast (B&B) hotels (including shared annexes)	580	1,550	+167.2% +970	24
Families in B&B hotels (including shared annexes) for longer than 6 weeks	64	591	+823.4% +527	23

18. Welfare benefits play a key role in trapping people in temporary accommodation. Most people are aware of the benefit cap, and this limits welfare support to single people and households with more than two children who are not in employment. However, whilst a household is in temporary accommodation, they are entitled to full Housing Benefit provided they have a Universal Credit claim, regardless of their income. Their Housing Benefit is not included in the benefit cap calculation. If they move to a private rented property, they will be worse off as their housing costs will be included in the calculation. This effectively traps people on Universal Credit as it means that it is always cheaper for them to live in temporary accommodation than any other tenure.

19. The acceleration of the transition from legacy benefits to Universal Credit has recently been announced. This is important because it will mean that more people in temporary accommodation will be entitled to full housing benefit and become trapped as a result.
20. The lack of alignment of the benefit system and temporary accommodation rents is therefore trapping households in temporary accommodation, as even households securing Council housing tenancies at social rent levels are financially worse off if they leave temporary accommodation.
21. This is exacerbated by the freeze in Local Housing Allowance at 2020 rates. Rents have increased significantly over the last three years, but Local Housing Allowance has been frozen. The table below sets out the monthly Local Housing Allowance rates for Enfield alongside the average private rent:

	<b>1 bed</b>	<b>2 bed</b>	<b>3 bed</b>	<b>4 bed</b>	<b>5 bed</b>
LHA 2020	£1,067	£1,296	£1,596	£1,895	£1,895
Average Rent 2021	£1,000	£1,400	£1,780	£2,090	£2,780
Average Rent 2022	£1,070	£1,510	£2,000	£2,490	£3,060
Annual change	6.80%	7.60%	12.00%	18.90%	10.10%

22. The above figures are based on research by Hamptons. As a result, most properties within Enfield and Greater London are out of reach of households reliant on benefits to assist in paying their housing costs. This in turn means that we are unable to secure in-borough accommodation in the private rented sector. Similar scenarios are playing out across Greater London and are leading to the number of out of borough placements increasing both in terms of number and distance from the host authorities. This exacerbates the shortage of supply of both privately rented and temporary accommodation, and we are unable to find enough affordable homes within an hour and a half travel radius of Enfield.

### **Competition for Accommodation**

23. There are approximately 25,000 privately rented properties in Enfield. Of these the Council uses around 2000 homes as temporary accommodation. However, we estimate that there are over 3000 private rented properties used by other local authorities within Enfield. There are currently 21 boroughs who are actively procuring in Enfield, and this means that we are effectively competing for the few available properties.
24. Within Greater London there is an agreement in place to mitigate the effects of this competition. Each borough publishes the maximum rate that it will pay for both temporary accommodation and incentives for privately rented homes. This is administered through the Inter-borough Accommodation Agreement (IBAA). Boroughs make quarterly returns on the implementation of the agreement. However, other boroughs are not the only organisations procuring in Enfield. In particular, the Home Office has embarked on a large-scale procurement programme to rehouse

refugees currently in hotels. The contractor, Clearsprings, is not subject to the IBAA and regularly outbids local authorities.

### **Need for additional supply of homes**

25. In simple terms, we need to be able to source around 50 homes per month to meet the needs of those households newly approaching us. To deliver a sustained reduction in the use of hotel accommodation will require a minimum of 100 properties per month.
26. We are currently managing to source around 10 properties per month within an hour and a half travel of Enfield. This includes properties procured through Capital Letters.
27. The lack of affordable accommodation in the local and regional area means that if we are to fulfil our statutory duties, we need to secure accommodation for households in parts of the country where Local Housing Allowance will cover all or most of the rent.
28. Keeping families in hotel accommodation is only ever an emergency solution and it would be unfair to residents to imply unrealistic expectations about our ability to secure affordable accommodation locally. Equally the cost of the provision to the Council is currently circa £850,000 per month and is unsustainable.
29. Our aim is therefore to start securing properties further afield and to maximise choice for residents on these options. Where residents can secure accommodation more locally, we will continue to offer financial and practical support through our Find Your Own Home scheme. However, our primary focus will be on areas where rents are more closely aligned with Local Housing Allowance. For most residents in hotel and temporary accommodation this will mean relocating out of London and the southeast of England.
30. The new Placement Policy sets out the criteria that will be used to prioritise vulnerable residents for the extremely scarce supply of more local private rented accommodation and temporary accommodation.
31. Our aim is to end the use of hotel accommodation by the end of September 2023 and to deliver sustained reductions in the use of temporary accommodation thereafter. This is a challenging objective but provides a necessary focus to support the need for rapid change.
32. To facilitate out of area moves and reductions in the use of temporary accommodation we will need to change the way in which the service operates and the way in which we support residents.

### **New Service Model**

33. The traditional approach towards homelessness services has three stages:
  - Prevention – where we work with households who are likely to become homeless within 56 days to prevent homelessness
  - Relief – where we work with newly homeless households to secure permanent accommodation whilst we also issue decisions on priority need, intentionality, suitability and main duty

- Main duty – where we have accepted a full housing duty towards the household and are working with them to secure a permanent home.
34. The new approach will see this process simplified. Decisions on priority need, intentionality and Relief will be made at the prevention stage. We will aim to secure alternative accommodation before the date the family are due to become homeless. For most households this will be outside the southeast of England. We will make two reasonable offers of accommodation in accordance with our new approach.
  35. At the relief and main duty stage, the initial focus will be on those households currently in hotel accommodation and residents in other forms of temporary accommodation. . where we will relocate households to private rented accommodation in areas where rents and LHA converge.
  36. The only exception to this will be households that approached the Council before November 2012. There are currently 330 households in temporary accommodation in this position. The Council has a statutory duty to make an offer of social housing to these households.
  37. The proposed changes will affect all other homeless households.
  38. Staff will need to be supported with training and supervision on the approach. .
  39. We will support residents with relocation including:
    - a. Extending the Find Your Own Home scheme to apply nationally where rent deposits and rent in advance can be paid to landlords to support access to private rented accommodation
    - b. Identifying opportunities to work in partnership with Registered Providers to access social rented properties where there is availability
    - c. Making financial payments to support residents with relocation costs
    - d. Information on how to prepare for a relocation
    - e. Ensuring that accommodation is of an acceptable quality and that residents can furnish homes ready for occupation
    - f. Support to settle into a local area, to find employment and access local services including through our partners including the charity BEAM

#### **Other Options Considered**

40. The options considered to increase the supply of properties include:
41. Increased priority for social housing for homeless households. Each year around 350 homes become available to let through the Housing Needs Register. However, the scale of the challenge means that around 450 households approach the Council for assistance each month. There is simply not enough social housing to meet this level of demand.
42. Increased use of Discretionary Housing Payments to meet increased rents. This would both prevent households from losing their home and enable residents to access more expensive privately rented homes. This option was rejected because it would lock the Council in to an open-ended



arrangement where the Council was subsidising the rent of an ever-increasing number of households. The Government has not committed to a future increase in Local Housing Allowance and so this option would rapidly become unaffordable.

43. Paying market rent levels for temporary accommodation. This would be significantly more expensive than the current procurement of temporary accommodation and would cost in excess of £500 per property per month. This does not resolve the issue of finding a permanent home for residents and would result in the Council subsidising the rent of an ever-increasing number of households. It is likely that existing temporary accommodation landlords would also seek to increase their rents to match the rates faced on procurement of new properties meaning an increase in cost to the Council of up to £3.5m.

#### **Housing Gateway**

44. Move on rates in Housing Gateway accommodation are low with some residents remaining tenants for 3 years or more. Given the wider pressures the Council is facing it is proposed that new tenants are given 2 year tenancies at LHA rents reverting to market rents beyond this period rather than the current rolling tenancy. The product still provides a vital route for residents that do not have a deposit or credit history that would support a tenancy in the private rented sector. A successful tenancy with Housing Gateway provides an opportunity to build a tenancy track record enabling access to the private rented sector. Existing tenants will be moved to market rent from April 2024 and advised of this and options for move on following this decision.

#### **Preferred Option and Reasons For Preferred Option**

45. The lack of affordable accommodation in the local and regional area and the scale of the pressures means that if we are to fulfil our statutory duties, we need to secure accommodation for households in parts of the country where Local Housing Allowance will cover all or most of the rent.
46. Keeping families in hotel accommodation is only ever an emergency solution and sets unrealistic expectations about our ability to secure affordable accommodation locally. Equally the cost of the provision to the Council is currently circa £850,000 per month and is unsustainable.
47. Our aim is therefore to start securing properties further afield. Where residents can secure accommodation more locally, we will continue to offer financial and practical support through our Find Your Own Home scheme. However, our primary focus will be on areas where rents are more closely aligned with Local Housing Allowance. For most residents in hotel and temporary accommodation this will mean relocating out of London and the southeast of England.
48. The new Placement Policy (attached at Appendix 1) sets out the criteria that will be used to prioritise vulnerable residents for the extremely scarce supply of more local private rented accommodation and temporary accommodation.
49. Our aim is to end the use of hotel accommodation and to deliver sustained reductions in the use of temporary accommodation thereafter.

### **Relevance to Council Plans and Strategies**

Good homes in well-connected neighbourhoods

50. In seeking to drive up the quality and availability of properties in the private rented sector, the proposal will increase the number and quality of homes available to low-income households in the borough.

Sustain strong and healthy communities

51. Poor quality housing and homelessness have been identified as key factors in health inequality. Through reducing the number of households reaching crisis point and increasing the supply and quality of rented homes we will help to reduce the impact of homelessness and poor housing on the health and wellbeing of our residents.

Build our local economy to create a thriving place

52. The proposals aim to ensure a thriving, high quality private rented sector that is accessible to low-income households. By acting proactively to engage with and support landlords we aim to increase the supply of rented homes.

### **Financial Implications**

53. Procuring properties at scale out of borough should achieve both a short and long term reduction in TA costs for Enfield.

54. In order to maximise the cost avoided while residents are housed in TA, the areas where placements are made need to be targeted to specific Broad Rental Market Areas (BRMA's) where the LHA rate has remained close to the 2011 LHA rate. This will ensure that Housing Benefit will cover most of the rent without a large Council contribution.

55. For placements made into the PRS – where the Council has ceased its obligation to the tenant, then placements should be made in areas where the LHA rate is very close to the rent the tenant will need to pay in order for the property to be affordable to them on an ongoing basis.

56. There are some obvious costs attached to this process, the level of which are not currently clear;

- In depth training for a large number of staff on the new arrangements and how to deal with them.
- An increase in highly skilled staff procured through agencies to help make the proposal a reality and reduce the risk of legal challenge.
- The use of national relocation organisations in order to ensure a sufficient supply of accommodation outside of London on an ongoing basis.

57. It is also important to note the likely requirement from 2025 that all new lets will need to be EPC C or above. Most, if not all, of the current TA portfolio is currently below that level. The Council therefore will need some strategic focus to ensure this does not become an issue 2 years from now. Engagement with agents and landlords from an early stage will hopefully avoid many issues further down the line and it may be appropriate to offer some sort of incentive to landlords to undertake the required works well in

advance of 2025 in exchange for a long-term agreement to let the units to the Council.

58. That incentive should not be limited to landlords currently leasing units to the Council, a wider approach could produce significant supplies of new properties for the Council to use.
59. To help facilitate the transition to the new service model and placement policy, the Council will be allocating £1.1m from the Housing Support Fund towards Temporary Accommodation in order to provide support to those households moving out of the borough.

### **Legal Implications**

60. Local authorities have a duty to accommodate homeless people under the Housing Act 1996 ("the Act"). If an accommodation duty is owed, the local authority must ensure that suitable accommodation is provided.
61. Section 208(1) of the Act says "so far as reasonably practicable a local housing authority shall in discharging their housing functions under this Part secure that accommodation is available for the occupation of the applicant in their district." This means that so far as reasonably practicable a local authority must try and provide accommodation in the local authority's area.
62. The concept of "suitability" is central to the ways in which a local authority can discharge its housing functions. The Homelessness (Suitability of Accommodation) (England) Order 2012 says that in determining whether accommodation is suitable for a person, a local authority must take into account such matters as the location of accommodation including where the accommodation is situated outside its district, the distance from its district and the significance of any disruption which may be caused by the location of the accommodation to the employment, caring responsibilities or education of the person or members of the person's household.
63. Section 11 of the Children Act 2004, requires local authorities, when discharging its housing functions, to have regard to the need to safeguard and promote the welfare of children when making decisions about suitability of accommodation for a person and their household. This means that when arranging in borough or out of borough accommodation, local authorities must consider the educational and welfare issues of a child.
64. The case of *Nzolameso v City of Westminster* [2015] UKSC 22 involved issues regarding the Children Act 2004 and out of borough accommodation. The Court said that the question of whether accommodation offered is "suitable" for the applicant and each member of their household requires the local authority to have regard to the need to safeguard and promote the welfare of any children in her household. This requires the local authority to identify the principal needs of the children, both individually and collectively, and have regard to the need to safeguard and promote them when deciding whether accommodation is suitable.
65. Section 182 of the Housing Act 1996 requires that in the exercise of their functions relating to homelessness, a local authority shall have regard to the Secretary of State's "Homelessness Code of Guidance for Local Authorities". The Code says that local authorities who find it necessary to

make out of district placements, are advised to develop policies for the procurement and allocation of temporary accommodation which will help to ensure suitability requirements are met.

66. Where homeless people are accommodated out of borough, this will engage the duties under the Equalities Act 2010. Broadly, that is a duty to have due regard to the need to eliminate unlawful discrimination, harassment and victimisation and advance equality of opportunity and foster good relations between different groups. When the authority is looking to offer accommodation out of borough, the Equality Act duties will need to be considered to prevent any unlawful discrimination.
67. In principle the council's new "Placement Policy" is in line with legal requirements

### **Equalities Implications**

68. The shortages in the supply of affordable accommodation are driven by central government policy, and in particular the freeze of Local Housing Allowance and the Benefit Cap to 2020 levels. The Placement Policy seeks to mitigate the effect of these on Enfield residents but is not the driver of negative outcomes for residents.
69. An Equalities Impact Assessment has been completed for the Placement Policy. This found that although there was a differential impact on groups with protected characteristics, the impact of the Placement Policy was broadly positive. The Placement Policy sets out the criteria that will be used to prioritise the most vulnerable households for the extremely limited supply of more local accommodation. The key impacts on groups with protected characteristics are as follows:

#### *Socio-Economic Deprivation*

70. The biggest differential impact was in socio economic deprivation which reflects the link between poverty and homelessness. The widening gap between benefit levels and rents across the Southeast is both driving increases in homelessness and limiting the supply of properties that can be used as an affordable solution either as temporary accommodation or as a permanent home. Placing households in areas where there is closer alignment between rents and Local Housing Allowance is the only option open to the council to resolve the housing needs of poorer households.
71. Equally there are 750 households in more settled temporary accommodation who would become benefit capped if they moved out of temporary accommodation. We will need to work closely with these households to secure employment before a sustainable offer of accommodation can be made.

#### *Ethnicity and Religion*

72. Just 14% of households for whom the Council has accepted a duty described themselves as 'White British', compared with 52% of Enfield's wider population. The impact of the policy is positive in that it will ensure that households have access to a permanent, affordable, home. This applies to both residents in more settled temporary accommodation and those in hotels. However, we identified that there was a risk that households from a minority ethnic background may be isolated in their

new communities. This issue was also identified as applicable for religious groups.

73. It will therefore be important that we procure properties in areas where there is a diverse range of ethnic and religious groups to ensure that residents placed in these areas do not become isolated and are able to rebuild their lives.

*Marriage and Civil Partnership and Pregnancy and Maternity*

74. There is also an impact around marriage and civil partnership and pregnancy and maternity. For single parent households and new parents who are more dependent on local support networks, relocation to a new area will be challenging. Whilst the Placement Policy will prioritise the more vulnerable households for local accommodation there will be a need to ensure that households have access to local support networks and provided with links to local community groups.

*Disability*

75. Households with a disabled member of the family are more likely to be dependent on local support networks and services. The Placement Policy is designed to ensure that the most vulnerable households will be prioritised for local accommodation. This will increase the supply of properties available to households with a disabled member of the family and a demonstrable need to remain more locally.
76. We will need to continue to monitor the impact of the policy to ensure that there are no unintended consequences.

**HR and Workforce Implications**

77. To mobilise the new service model rapidly, the Council is taking a project management approach with dedicated teams working on specific workstreams and pathways. No changes in line management arrangements or formal structures are currently planned. We envisage continuing this approach for the next six to twelve months. Consultation with the unions took place on 10 May 2023.

**Public Health Implications**

78. Poor quality housing and homelessness have been identified as key factors in health inequality. Through reducing the number of households reaching crisis point and increasing the supply and quality of rented homes we will help to reduce the impact of homelessness and poor housing on the health and wellbeing of our residents.
79. The effects on households in hotel accommodation are extreme as there are no cooking facilities or private areas. The health implications are therefore that residents are dependent on takeaway food which is both unhealthy and expensive.

**Safeguarding Implications**

80. Safeguarding is a key concern for the service. Keeping households in hotel accommodation for extended periods is a key safeguarding risk. There are currently 32 children in hotel accommodation where Children and Family Services are actively involved, and the nature of the accommodation is interfering with our ability to fulfil our statutory

obligations. Moving families to self-contained accommodation will reduce the risks to vulnerable households and residents.

81. We will assess the needs of each household to be relocated against the Placement Policy. This prioritises the most vulnerable households for the extremely limited supply of local accommodation.

82. We will ensure a coordinated approach with Children and Family Services to ensure that the welfare of children and families is paramount.

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### **Appendices**

Placement Policy  
EQIA

### **Background Papers**

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

Cabinet Report – Homelessness in Enfield  
Cabinet Report – Homelessness in Enfield (2)  
Cabinet Report – Homelessness in Enfield (3)  
Cabinet Report – Homelessness in Enfield (4)



## Placement Policy for temporary accommodation and private rented sector offers

<b>Scope</b>	This policy explains how we will meet our statutory duties in finding accommodation, in accordance with Part VII of the 1996 Housing Act and the Homelessness Code of Guidance. It describes how we determine the suitability of temporary accommodation and also of private rented sector offers. This policy applies to both existing and future applicants.
<b>Approved by</b>	
<b>Approval date</b>	
<b>Document Author</b>	Richard Sorensen
<b>Document owner – Corporate</b>	Director of Housing and Regeneration
<b>Document owner – Portfolio Holder</b>	Cabinet Member for Social Housing
<b>Review</b>	We will keep this policy under constant review. We will update it based on any changes in legal or local context. The last review has been undertaken in April 2023.

## **1. Introduction**

Enfield Council is committed to using all its resources and creativity to make the experience of homelessness rare, brief and non-recurring. We are determined to enable everyone to access a stable, secure and decent home regardless of tenure. This is in the context of a severe shortage of rented accommodation in Enfield and in London generally.

This policy covers two elements of our strategy:

- Our use of short-term temporary accommodation
- Our use of the private rented sector to provide a sustainable solution for people experiencing homelessness

This policy sets out how we determine the suitability of accommodation for households we place into either the private rented sector or temporary accommodation. The severe shortage of housing, rising rental costs, and growing pressures on local government funding mean that for most households this will mean moving out of the borough and often away from the southeast of England.

This policy applies to all those households who have been accommodated by the Housing Advisory Service. The policy does not cover households who have secured their own accommodation in the private rented sector as the Council will not have been able to assess the suitability of accommodation in these circumstances.

This Policy may be amended according changing levels of need or legislation. Any changes must be approved by the Cabinet Member for Social Housing.

## **2. Temporary Accommodation Offers**

Temporary accommodation is not a long-term solution for residents. In particular hotel accommodation is reserved for emergency purposes only. Our aim is that no household should spend longer than six months in temporary accommodation. We aim to ensure that the accommodation we offer, meets the needs of the household and meets the suitability criteria set out below.

We will usually only make one offer of temporary accommodation to a household, usually as an emergency response or where we have been unable to secure a suitable and affordable home. The household will be expected to accept it on the date it is made. The accommodation is likely to be out of borough. Transport to the accommodation will be provided or paid for by the Council.

### **2.1. Moving from one temporary accommodation to another**

In some cases, a household living in temporary accommodation may have to move to a different unit of temporary accommodation. Depending on the type of the accommodation and changes in the housing market, we may expect the households to move with very short notice. In that case, we will give one offer of suitable alternative accommodation. If the household refuses the offer, we will not offer further accommodation and our duty to the household will come to an end.



### 3. Private Rented Sector Offers

We aim to prevent and relieve homelessness through assisting households to stay in their existing accommodation. Where this has not been possible and a household is either in temporary accommodation or will lose their existing accommodation, we will assist them into a suitable private rented home as quickly as possible. This means that we will arrange for a private rented sector landlord to make an offer of an assured short-hold tenancy in the private rented sector for a period of at least 12 months. We will evaluate each offer both with regard to needs of the household and the nature of the accommodation to be offered.

A maximum of two reasonable offers of affordable private rented housing will be made. Individual circumstances are considered in making these offers, including time scale, affordability, household preferences and needs. An acceptance of any suitable offer will end the Council's statutory duty. When a second suitable offer will be made, the household will be notified in writing and the Council's statutory duty will be formally ended, whether the offer is accepted or refused.

If the household wants a certain type of property in the private rented sector or in a specific area, we will advise them to conduct their own search. This enables households to choose the property they want to live in. If they find a property and it meets the suitability criteria, we will assist them in securing the tenancy. Households must not sign any tenancy agreement before we determine that the property is suitable, and the tenancy complies with certain conditions.

### 4. Suitability

We need to ensure that the accommodation we offer is suitable for the households we seek to place. In determining whether a property is suitable we will balance the needs of the household with the nature of the accommodation being considered. A key factor in determining location is the availability of suitable affordable housing.

Changes in the housing market, combined with the freeze on Local Housing Allowance mean that there is very little accommodation available within Greater London and Southeast England. Most households will be made an offer of affordable private rented accommodation in parts of the country where Local Housing Allowance aligns with average rents.

The extreme shortage of affordable accommodation within the Southeast means that we will prioritise some households ahead of others for the limited number of properties that become available.

The factors considered to prioritise households are set out at 4.4 onwards.

#### 4.1. Size of Accommodation

Accommodation must be of appropriate size household. We calculate the number of bedrooms that a household will need by following the steps below **in order**

Step 1: One bedroom for the applicant, and partner/spouse (*if any*)

Step 2: One bedroom for any additional adult couple

Step 3: One bedroom for any two additional people of the same sex

Step 4: One bedroom for any two additional people of the opposite sex aged nine and under

Step 5: One bedroom for any additional person

This calculation will not be used where there are safeguarding concerns. In these circumstances the size of property will be determined by the Housing Coordinator following a case conference and recommendations from a social worker from Adult Social Care or Children and Family Services.

#### **4.2. Standard of Accommodation**

All properties offered must meet the requirements set out in Enfield Council's Minimum Property Standards. These are set out at Appendix 1 – Minimum Standards

#### **4.3. Affordability**

Before making an offer of accommodation, we will assess each household's income and expenditure. This is in order to ensure that the household can afford to pay the rent for the property.

We will aim to secure properties for rent within the Local Housing Allowance rate as far as reasonably practicable so that they are affordable for people receiving housing benefit/ universal credit. Given the context of rapidly rising rents in Enfield, we need to procure accommodation out of London in order to continue to provide affordable accommodation.

In cases meeting the criteria set out in our Discretionary Housing Payments (DHP) Policy, we may award a time limited DHP to pay for shortfalls in Housing Benefit/ housing element of Universal Credit and Local Housing Allowance. The DHP Fund is a short-term emergency fund, awarded whilst the household takes action to resolve their housing problems in the longer term. This can include taking steps to find work; or taking steps to maximize their welfare entitlements.

#### **4.4. Location**

For residents reliant on benefits to cover their housing costs there is extremely limited supply of properties. We will support households to move to accommodation outside of the London Borough of Enfield:

- Where there is an ongoing threat to the safety of a household if they remain in Enfield
- Where there is no suitable affordable accommodation within Enfield available

The nature of the housing crisis means that our procurement activity will be focused on those areas of the country where Local Housing Allowance will still cover the

majority of the rent. We will support residents wishing to stay in or around Enfield in finding their own accommodation through our Find Your Own Home Scheme.

Section 208(1) of Housing Act 1996 says “so far as reasonably practicable a local housing authority shall in discharging their housing functions under this Part secure that accommodation is available for the occupation of the applicant in their district.” This means that so far as reasonably practicable a local authority must try and provide accommodation in the local authority’s area. The current state of the housing market, with the gap between benefits and rents increasing rapidly, mean that there is little or no accommodation that is affordable to low-income households within Greater London and the Southeast.

The limited number of properties that the Council secures either as temporary or permanent housing in or around Enfield will be reserved for households meeting the criteria set out from 4.4.1 onwards.

We will consider the factors below when determining the suitability of the location of the accommodation. The household may be asked to provide additional or updated information relating to their current circumstances to assist the Council in its determination.

In considering these factors the overriding issue is the availability of housing that is affordable to the household. For most households this will be the main factor in determining the suitability of an offer of accommodation.

We will refer to these factors when we explain to a household why they are being offered particular accommodation, and why an alternative was not offered if there is more than one property available.

#### **4.4.1. Employment**

When a member of the household or someone who is reasonably expected to live with the household, is in paid employment, we will consider the need to reach their normal workplace from the accommodation being considered. This also applies to people who have a confirmed start date of employment or are enrolled on a work readiness programme in Enfield.

We will give priority for accommodation in Enfield and its vicinity to households where a member of the household or someone who is reasonably expected to reside with the household, is in paid employment and a move out of Enfield would result in termination of this employment *with no prospects of finding employment in the new location*.

#### **4.4.2. Caring responsibilities**

We will consider caring responsibilities on an individual basis when determining what would be a reasonable location for the household to live.

We will consider households with members who are registered carers in receipt of carer’s allowance and provide care for a member of the family who is not part of the household but who resides in Enfield. We will give priority for accommodation in

Enfield and its vicinity to the carer's household if the person being cared for would require statutory health and social support if the care ceased.

#### **4.4.3. Education**

We will take the age of the child and the stage of their education into consideration. If households include children who will take statutory exams within an academic year, we will aim to assist them in finding accommodation within a reasonable travelling distance from their school. This includes children enrolled in GCSE, AS or A level courses or post 16 vocational qualifications in schools based in Enfield. Households that include children who are not taking statutory exams within an academic year may have to move further away. In such a case, we would advise that the children change schools.

We will give priority for accommodation in Enfield and its vicinity to households with children taking statutory exams within the academic year. We will also give special consideration to households with children with Special Educational Needs and Disabilities (SEND) who are receiving educational support from Enfield Council. We will give priority for accommodation in Enfield and its vicinity if changing school would be detrimental to their education and well-being (for example, if they could not receive special educational needs support elsewhere). In some specific cases the family could benefit from a coordinated move to another area, if a move would allow the family to live closer to specialist educational support. Housing services will work in partnership with children's services to determine this.

#### **4.4.4. Children subject to a child protection plan**

We will consider any cases where children are subject to a child protection plan on an individual basis. Social workers will advise on these cases, in order that we consider all safeguarding concerns and determine whether the household should be prioritised to stay in the borough. In some cases, the children may benefit from a move out of the borough, as that could eliminate the threat to their well-being.

#### **4.4.5. Adults in education**

We will take into account the needs of any adult in the household who is in education. This includes adults in higher or adult education, vocational and professional training, or a recognised apprenticeship.

#### **4.4.6. Medical facilities, medical and health issues**

We will take into account individual medical and health needs. We will consider any ongoing treatments and the implications of transferring to healthcare providers closer to new accommodation.

When determining suitability with regard to the household's medical needs, we will consider whether the medical condition itself makes the housing and location offered unsuitable. If the household cites previously unidentified medical grounds as the reason for refusing the accommodation, we will ask the household to submit evidence within a reasonable time period.

We will give priority for accommodation in Enfield and its vicinity to households with members who meet at least one of the following conditions:

- have a severe and enduring physical or mental health condition requiring regular specialist care that a move from Enfield and its vicinity would significantly disrupt
- have an enduring physical or mental health problem where a loss of local support network would severely impact their well-being

#### **4.4.7. Services, amenities and transport**

We will consider accessibility to local services, amenities and transport.

#### **4.4.8. Wider community support networks**

We understand that some households rely on local support networks in their daily lives more strongly than others. The nature of the support varies. It includes but is not limited to childcare, membership of a religious community, or support for recovering drug addicts. We will consider any such circumstances on an individual basis. Therefore, we will take into account situations where a loss of local support networks would be significantly detrimental to the wellbeing of the household.

### **5. Support for Households**

We will offer all households who move out of the borough and its vicinity relocation support. This is when households are moving further away than a neighbouring borough. The level of support will depend on the individual and collective needs of the household and the location. This may include financial support to enable a permanent move.

Relocation support may include information on:

- local schools
- Special Educational Needs support
- local child care
- local GPs
- housing benefit as well as any other benefits the household may be entitled to
- information on their new local council, Council Tax, registering to vote and relevant local services
- community care services and social groups
- where relevant, information on local employment opportunities
- guaranteeing rent payments to landlords for up to a year where a resident is not able to provide evidence of income

### **6. Right to Review**

Households have a statutory right to request an internal review regarding decisions we make on several issues. One of these is suitability of accommodation. If the outcome of the review is in the household's favour, this means that the decision to end our duty is set aside and we will then make a further offer of accommodation.

If the household is not satisfied with the outcome of the review, they can appeal to the County Court, but only if the Council has made a legal error when making the decision. An appeal must be brought within 21 days of notification. If the applicant has not been notified of the outcome within the prescribed time period, an appeal must be brought within 21 days of when they should have been notified.

The following reasons are **unlikely** to be considered as acceptable reasons for refusal:

- the quality of decoration/furniture
- provision of parking
- lack of access to a garden
- any medical condition that is not directly impacted by the particular accommodation offered
- geographical location

## **7. Tackling fraud**

It is an offence for any resident to knowingly make a false statement intended to induce the Council to believe that they or any others are entitled to accommodation. Where we suspect that a fraud may have been committed, this matter will be investigated and may lead to criminal proceedings being instigated.

## Enfield Equality Impact Assessment (EqIA)

### Introduction

The purpose of an Equality Impact Assessment (EqIA) is to help Enfield Council make sure it does not discriminate against service users, residents and staff, and that we promote equality where possible. Completing the assessment is a way to make sure everyone involved in a decision or activity thinks carefully about the likely impact of their work and that we take appropriate action in response to this analysis.

The EqIA provides a way to systematically assess and record the likely equality impact of an activity, policy, strategy, budget change or any other decision.

The assessment helps us to focus on the impact on people who share one of the different nine protected characteristics as defined by the Equality Act 2010 as well as on people who are disadvantaged due to socio-economic factors. The assessment involves anticipating the consequences of the activity or decision on different groups of people and making sure that:

- unlawful discrimination is eliminated
- opportunities for advancing equal opportunities are maximised
- opportunities for fostering good relations are maximised.

The EqIA is carried out by completing this form. To complete it you will need to:

- use local or national research which relates to how the activity/ policy/ strategy/ budget change or decision being made may impact on different people in different ways based on their protected characteristic or socio-economic status;
- where possible, analyse any equality data we have on the people in Enfield who will be affected eg equality data on service users and/or equality data on the Enfield population;
- refer to the engagement and/ or consultation you have carried out with stakeholders, including the community and/or voluntary and community sector groups you consulted and their views. Consider what this engagement showed us about the likely impact of the activity/ policy/ strategy/ budget change or decision on different groups.

The results of the EqIA should be used to inform the proposal/ recommended decision and changes should be made to the proposal/ recommended decision as a result of the assessment where required. Any ongoing/ future mitigating actions required should be set out in the action plan at the end of the assessment.

## Section 1 – Equality analysis details

<b>Title of service activity / policy/ strategy/ budget change/ decision that you are assessing</b>	Homelessness in Enfield (5) Placement Policy
<b>Team/ Department</b>	Housing Advisory Service
<b>Executive Director</b>	Sarah Cary
<b>Cabinet Member</b>	Cllr Savva
<b>Author(s) name(s) and contact details</b>	Richard Sorensen
<b>Committee name and date of decision</b>	Cabinet June 2023

<b>Date the EqIA was reviewed by the Corporate Strategy Service</b>	
<b>Name of Head of Service responsible for implementing the EqIA actions (if any)</b>	Richard Sorensen
<b>Name of Director who has approved the EqIA</b>	Joanne Drew

The completed EqIA should be included as an appendix to relevant EMT/ Delegated Authority/ Cabinet/ Council reports regarding the service activity/ policy/ strategy/ budget change/ decision. Decision-makers should be confident that a robust EqIA has taken place, that any necessary mitigating action has been taken and that there are robust arrangements in place to ensure any necessary ongoing actions are delivered.

## Section 2 – Summary of proposal

Please give a brief summary of the proposed service change / policy/ strategy/ budget change/project plan/ key decision

**Please summarise briefly:**

What is the proposed decision or change?

What are the reasons for the decision or change?

What outcomes are you hoping to achieve from this change?



Who will be impacted by the project or change - staff, service users, or the wider community?

1. Due to the severe and detrimental impact that this is having on residents given the resulting lack of affordable accommodation in North London, the Council must move to introduce a new approach to maximise the opportunities for residents to secure affordable accommodation. This report seeks approval to this new service model and the accompanying revised Placement Policy.
2. The lack of affordable accommodation in the local and regional area means that if we are to fulfil our statutory duties, we need to secure accommodation for households in parts of the country where Local Housing Allowance will cover all or most of the rent.
3. Keeping families in hotel accommodation is only ever an emergency solution and sets unrealistic expectations about our ability to secure affordable accommodation locally. Equally the cost of the provision to the Council is currently £850,000 per month and is unsustainable.
4. Our aim is therefore to start securing properties further afield. Where residents can secure accommodation more locally, we will continue to offer financial and practical support through our Find Your Own Home scheme. However, our primary focus will be on areas where rents are more closely aligned with Local Housing Allowance. For most residents in hotel and temporary accommodation this will mean relocating out of London and the southeast of England.
5. The new Placement Policy sets out the criteria that will be used to prioritise vulnerable residents for the extremely scarce supply of more local private rented accommodation and temporary accommodation. Accommodation procured locally will be reserved for the most vulnerable households. Other households will be expected to relocate out of the area.
6. The impact of the new policy will be on two primary groups:
  - Those households in hotel accommodation
  - Those households in more settled temporary accommodation
7. There is an immediate benefit for households currently in hotel accommodation as they will move to a self-contained home.
8. For households in settled temporary accommodation, the move to a permanent home out of area may be seen by them as disadvantageous. Their move will free up local temporary accommodation for more vulnerable households currently in hotels. For these households, relocation will provide a permanent affordable home which is not currently possible within Enfield. Most households in temporary accommodation live in nightly paid properties where there is little or no security of tenure. There is therefore a positive impact for these households.
9. The analysis is based on the 1582 households (2798 people) for whom the council has accepted a duty in the first four months of 2023.

## Section 3 – Equality analysis

This section asks you to consider the potential differential impact of the proposed decision or change on different protected characteristics, and what mitigating actions should be taken to avoid or counteract any negative impact.

According to the Equality Act 2010, protected characteristics are aspects of a person's identity that make them who they are. The law defines 9 protected characteristics:

1. Age
2. Disability
3. Gender reassignment.
4. Marriage and civil partnership.
5. Pregnancy and maternity.
6. Race
7. Religion or belief.
8. Sex
9. Sexual orientation.

At Enfield Council, we also consider socio-economic status as an additional characteristic.

“Differential impact” means that people of a particular protected characteristic (eg people of a particular age, people with a disability, people of a particular gender, or people from a particular race and religion) will be significantly more affected by the change than other groups. Please consider both potential positive and negative impacts and provide evidence to explain why this group might be particularly affected. If there is no differential impact for that group, briefly explain why this is not applicable.

Please consider how the proposed change will affect staff, service users or members of the wider community who share one of the following protected characteristics.

**Detailed information and guidance on how to carry out an Equality Impact Assessment is available [here](#). (link to guidance document once approved)**

**Age**

This can refer to people of a specific age e.g. 18-year olds, or age range e.g. 0-18 year olds.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people of a specific age or age group (e.g. older or younger people)?

Please provide evidence to explain why this group may be particularly affected.

There is no differential impact on any particular age group. There is a differential impact on households with children as there is a greater shortage of supply of affordable family sized accommodation locally. Within the 1582 households the following ages were recorded:

Age	No
0-4	1
12-15	9
16-17	82
18-20	147
21-24	219
25-29	265
30-44	710
45-59	365
5-7	1
60-64	63
65-74	60
75-84	7
85-89	2
90 and over	3

In the 2021 Census, Enfield's age structure shows the working-age population to be 216,693 which is 65.7% of the population. People under the age of 16 represent 20.5% of the population, and over 65s represent 13.7% of the population.

This means that there is a disproportionate impact on working age households and older people are underrepresented within the households approaching the Council for assistance.

There are around 2900 households in more settled temporary accommodation. The breakdown of ages of the lead applicant for whom we hold data is set out below:

Age	No	%
18-25	179	6.26%
26-35	733	25.62%
36-45	936	32.72%
46-55	691	24.15%
56-65	252	8.81%
66-75	51	1.78%
75+	19	0.66%

Older people may have a greater dependency on local support networks to enable them to live independently. The Placement Policy is designed to ensure that those residents who are dependent on local support networks are prioritised for the limited supply of more local  
EqIA template approved by EMT 16<sup>th</sup> June 2020

accommodation.

#### Mitigating actions to be taken

Ensure that the Placement Policy is correctly applied to enable those people who are dependent on local support networks are prioritised for local accommodation.

Ongoing monitoring of the impact of the new policy and a review after six months

#### Disability

A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on the person's ability to carry out normal day-day activities.

This could include: physical impairment, hearing impairment, visual impairment, learning difficulties, long-standing illness or health condition, mental illness, substance abuse or other impairments.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people with disabilities?

Please provide evidence to explain why this group may be particularly affected.

The analysis is based on the 1582 households for whom the council has accepted a duty in the first four months of 2023. During this period 198 households included someone with a physical disability, 32 had a learning disability and 210 had disabilities caused by their mental health.

Under the current arrangements households entering temporary accommodation are housed in hotel accommodation due to the shortage of both private rented and TA. The proposed change in approach will therefore have a positive impact on these households, enabling them to secure a permanent, affordable, home.

There is a positive differential impact on people with a physical or mental disability as they will have greater access to affordable permanent homes. More vulnerable residents will also be prioritised for the limited supply of local accommodation through the Placement Policy, and this will disproportionately benefit both those in hotels and more settled forms of temporary accommodation.

#### Mitigating actions to be taken

Ensure that the Placement Policy is correctly applied to enable residents who are dependent on local health services and support networks are prioritised for local accommodation.

Where local accommodation is not possible, ensure that similar services are available to the residents in a new location and that support with the transition is available.

Ongoing monitoring of the impact of the new policy and a review after six months

### Gender Reassignment

This refers to people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on transgender people?

Please provide evidence to explain why this group may be particularly affected.

There is no differential impact on people who are or have reassigned their sex. The analysis is based on the 1582 households for whom the council has accepted a duty in the first four months of 2023. During this period 14 people stated that their gender was different to that assigned at birth and a further 25 declined to answer the question.

Under the current arrangements households entering temporary accommodation are housed in hotel accommodation due to the shortage of both private rented and TA. The proposed change in approach will therefore have a positive impact on these households, enabling them to secure a permanent, affordable, home.

People undergoing gender reassignment are often dependent on local support networks and health services. The Placement Policy is designed to ensure that people who are dependent on local health and support networks are prioritised for more local accommodation.

### Mitigating actions to be taken

Ensure that the Placement Policy is correctly applied to enable residents who are dependent on local health services and support networks are prioritised for local accommodation.

Where local accommodation is not possible, ensure that similar services are available to the residents in a new location and that support with the transition is available.

Ongoing monitoring of the impact of the new policy and a review after six months

### Marriage and Civil Partnership

Marriage and civil partnerships are different ways of legally recognising relationships. The formation of a civil partnership must remain secular, where-as a marriage can be conducted through either religious or civil ceremonies. In the U.K both marriages and civil partnerships can be same sex or mixed sex. Civil partners must be treated the same as married couples on a wide range of legal matters.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people in a marriage or civil partnership?

Please provide evidence to explain why this group may be particularly affected.

There is no differential impact on households based on their relationships.

Within the 1582 households for whom the Council has accepted a duty there were:

Co-habiting	49
Divorced	28
Married	188
Separated	39
Single	724
Widowed	7

Single people, with or without children, will therefore disproportionately benefit from the new policy.

There are around 2900 other households currently living in more settled temporary accommodation. There are 629 couples living in temporary accommodation with the remainder being single people with or without children. Single adults with or without children will therefore disproportionately benefit from an increased supply of privately rented accommodation.

However, for single parent households who are more dependent on local support networks, relocation to a new area will be challenging. Whilst the Placement Policy will prioritise the more vulnerable households for local accommodation there will be a need to ensure that women have access to local support networks and provided with links to local community groups.

#### **Mitigating actions to be taken**

Ensure that the Placement Policy is correctly applied to enable residents who are dependent on local health services and support networks are prioritised for local accommodation.

Where local accommodation is not possible, ensure that similar services are available to the residents in a new location and that support with the transition is available.

Ongoing monitoring of the impact of the new policy and a review after six months

### Pregnancy and maternity

Pregnancy refers to the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on pregnancy and maternity?

Please provide evidence to explain why this group may be particularly affected.

There is no differential impact on people who are pregnant or expecting a baby. The analysis is based on the 1582 households for whom the council has accepted a duty in the first four months of 2023. 107 women had had a baby in the previous 12 months and a further 95 were pregnant.

For expectant and new mothers, support networks are particularly important. The need for support is one of the factors to be considered as part of the placement policy, with more vulnerable households being prioritised for the limited supply of local accommodation.

Under the current arrangements households entering temporary accommodation are housed in hotel accommodation due to the shortage of both private rented and TA. The proposed change in approach will therefore have a positive impact on these households, enabling them to secure a permanent, affordable, home.

### Mitigating actions to be taken

Ensure that the Placement Policy is correctly applied to enable residents who are dependent on local health services and support networks are prioritised for local accommodation.

Where local accommodation is not possible, ensure that similar services are available to the residents in a new location and that support with the transition is available.

### Race

This refers to a group of people defined by their race, colour, and nationality (including citizenship), ethnic or national origins.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people of a certain race?

Please provide evidence to explain why this group may be particularly affected.

In the first four months of 2023, the Council accepted a duty towards 1582 households. The largest groups by ethnic background are as follows:

Black or Black British - African	24%
White Other - Other	17%
White - British	14%
Black or Black British - Caribbean	8%
White Other - Turkish	6%
Any other ethnic group	6%
Mixed - Other	5%
Black or Black British - Other	3%
Don't know / refused	3%
Asian or Asian British - Bangladeshi	2%
Mixed - White and Black African	2%
Mixed - White and Black Caribbean	2%

The new policy will therefore have a differential impact on minority ethnic groups with only 14% of households being white British. This compares against the 2021 Census data where 52% of Enfield's population is white. Under the current arrangements households entering temporary accommodation are housed in hotel accommodation due to the shortage of both private rented and TA. The proposed change in approach will therefore have a positive impact on these households, enabling them to secure a permanent, affordable, home.

There are around 2900 other households currently living in more settled temporary accommodation. Of these households we hold ethnicity data on 1471 households. This reflects the fact that many households have been living in temporary accommodation before the implementation of the Homelessness Reduction Act.

There are a wide range of ethnicities within the households living in temporary accommodation. The largest groups are:

BLACK AFRICAN	24.61%
BLACK CARIBBEAN	11.83%
WHITE UK	11.01%
TURKISH	10.40%
WHITE OTHER	6.19%
OTHER ETHNIC	5.37%
SOMALIAN	4.42%
KURDISH	3.13%

Whilst the immediate focus for the new placement policy will be on households in hotel accommodation, there will be households who cannot be expected to relocate. In order to ensure that we can provide the most vulnerable households with local accommodation, the placement policy will need to apply to all households in temporary accommodation.

For these households, relocation will provide a permanent affordable home which is not currently possible within Enfield. Most households in temporary accommodation live in nightly paid properties where there is little or no security of tenure. There is therefore a positive impact for these households.

Minority households are supported by the communities that they live in, and it is important to ensure that in making out of area placements that the communities that we are placing into are supportive and sufficiently diverse.



**Mitigating actions to be taken**

We will need to ensure that we procure properties in areas where there are established minority groups to ensure that residents are not isolated in their new communities.

### Religion and belief

Religion refers to a person's faith (e.g. Buddhism, Islam, Christianity, Judaism, Sikhism, Hinduism). Belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who follow a religion or belief, including lack of belief?

Please provide evidence to explain why this group may be particularly affected.

Christian households are the largest single group with 533 (33.7%) identifying as Christian. 397 households declined to answer (25.1%). The next largest groups are Muslim households with 373 (23.5%) identifying as Muslim, and 198 (12.5%) stating that they had no religion.

	No	%
Christian	533	33.7%
Prefer not to say	397	25.1%
Muslim	373	23.6%
No Religion	198	12.5%
Other	69	4.4%
Hindu	4	0.3%
Jewish	2	0.1%
Sikh	2	0.1%
Rastafarian	2	0.1%

This compares with the 2021 census data which found:

Christian - 153,015 people or 46.4%

Buddhist - 1,716 people or 0.5%

Hindu - 10,231 people or 3.1%

Jewish - 3,713 people or 1.1%

Muslim - 61,477 people or 18.6%

Sikh - 1,199 people or 0.4%

Other - 98,633 people or 29.9%

There is therefore a slightly greater impact on Muslim households as they are more likely to be in need of accommodation and a slightly lower impact on Christian households.

Religious groups are supported by the communities that they live in, and it is important to ensure that in making out of area placements the communities that we are placing into are supportive and sufficiently diverse.

Under the current arrangements households entering temporary accommodation are housed in hotel accommodation due to the shortage of both private rented and TA. The proposed change in approach will therefore have a positive impact on these households, enabling them to secure a permanent, affordable, home.

### Mitigating actions to be taken

We will need to ensure that we procure properties in areas where there are established religious groups to ensure that residents are not isolated in their new communities.

Ongoing monitoring of the impact of the new policy and a review after six months

### Sex

Sex refers to whether you are a female or male.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on females or males?

Please provide evidence to explain why this group may be particularly affected.

Within the 1540 households for whom the Council has accepted a duty the following genders were recorded:

Gender	No
Female	1093
Male	739
Not known / Other	1
Prefer not to say	7

There is therefore a disproportionate impact on women as women make up 52% of Enfield's population but 59% of those to whom the council has accepted a duty.

Within the more settled temporary accommodation, 64% of households living in temporary accommodation are single women or single women with children.

Under the current arrangements households entering temporary accommodation are housed in hotel accommodation due to the shortage of both private rented and TA. The proposed change in approach will therefore have a positive impact on these households, enabling them to secure a permanent, affordable, home.

### Mitigating actions to be taken

Ongoing monitoring of the impact of the new policy and a review after six months

### Sexual Orientation

This refers to whether a person is sexually attracted to people of the same sex or a different sex to themselves. Please consider the impact on people who identify as heterosexual, bisexual, gay, lesbian, non-binary or asexual.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people with a particular sexual orientation?

Please provide evidence to explain why this group may be particularly affected.

The analysis is based on the 1582 households for whom the council has accepted a duty in the first four months of 2023. During this period 5 people identified as not being heterosexual and another 25 decline to say. There is no identifiable differential impact on people with a particular sexual orientation.

Data on households in more settled forms of temporary accommodation is more scarce and there is insufficient data to draw a conclusion. Many of the households in temporary accommodation have been living there since before the introduction of the Homelessness Reduction Act meaning that the equalities data was not collected in key areas.

### Mitigating actions to be taken

We are in the process of implementing a new case management system. A core aspect of this is to improve the collection and use of equalities data including for sexual orientation.

Ongoing monitoring of the impact of the new policy and a review after six months

### Socio-economic deprivation

This refers to people who are disadvantaged due to socio-economic factors e.g. unemployment, low income, low academic qualifications or living in a deprived area, social housing or unstable housing.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who are socio-economically disadvantaged?

Please provide evidence to explain why this group may be particularly affected.

Homeless households are largely at the bottom end of the income spectrum. This means that households in temporary accommodation are largely dependent on benefits. The freeze on Local Housing Allowance has meant that the local private rented sector is unaffordable for the majority of households. The growing gap between benefits and rents is set out below.

	1 bed	2 bed	3 bed	4 bed	5 bed
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LHA 2020	£1,067	£1,296	£1,596	£1,895	£1,895
Average Rent 2021	£1,000	£1,400	£1,780	£2,090	£2,780
Average Rent 2022	£1,070	£1,510	£2,000	£2,490	£3,060
Annual change	6.80%	7.60%	12.00%	18.90%	10.10%

There is therefore a disproportionate impact on low-income households both in hotel accommodation and temporary accommodation.

Under the current arrangements households entering temporary accommodation are housed in hotel accommodation due to the shortage of both private rented and TA. The proposed change in approach will therefore have a positive impact on these households, enabling them to secure a permanent, affordable, home.

In the wider population in temporary accommodation, around 750 households would become benefit capped if they moved out of temporary accommodation. Securing affordable accommodation for these households is therefore dependent on being able to move them into employment.

#### **Mitigating actions to be taken.**

Identify and support households likely to be benefit capped following a move to the private rented sector. Offers of accommodation will need to be linked to employment opportunities for these households

## Section 4 – Monitoring and review

How do you intend to monitor and review the effects of this proposal?

Who will be responsible for assessing the effects of this proposal?

Monitoring outcomes for households affected by the Benefit Cap will form part of the monthly performance challenge meetings for the Housing Advisory Service.

Equalities data will be linked to data on placements to ensure that there are no unintended consequences and monitored through the performance challenge meetings.

A review of the Placement Policy will be carried out in January 2024 to evaluate its impact and whether further changes are required.

## Section 5 – Action plan for mitigating actions

Any actions that are already completed should be captured in the equality analysis section above. Any actions that will be implemented once the decision has been made should be captured here.

Identified Issue	Action Required	Lead officer	Timescale/By When	Costs	Review Date/Comments
Households who would be benefit capped following a move out of TA	Employment support	Vince Rose	Ongoing	Beam contract £64k pa	Sept 2023
Ongoing monitoring	Link equalities data to placement data to enable ongoing monitoring	Lian Brian Preacher	June 2023	N/A	Monthly
Review of the placement policy	Review of the placement policy	Richard Sorensen	Jan 2024	N/A	Jan 2024
Benefit capped households unable to afford private rented accommodation	Identify households affected by the benefit cap. Support these households into employment.	Lucretia Thomas	April 2024	N/A	Sept 2023
Minority groups may be isolated in new communities	Ensure procurement in areas with diverse populations	Mark Drury	Ongoing	N/A	Sept 2023

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

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