

LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date: 20 September 2022

Report of
Head of Planning

Contact Officer:
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Ward: Upper
Edmonton

Application Number: 21/04742/FUL

Category: Major

LOCATION: Meridian Water Willoughby Lane and Meridian Way London N18

PROPOSAL: Full planning application for development of Phase 1b of Meridian Water to provide new residential accommodation (Use Class C3), ground floor commercial floorspace (Use Class E(a), (b), (g)), leisure floorspace (Use Class E(d)) and medical centre (Use Class E(e)) across three buildings including ancillary areas to these uses, roads and footpaths, car and cycle parking provision, public open space including areas for play, landscaping and drainage; and areas of landscaping and open space for temporary and meanwhile uses.

Applicant Name & Address:
Vistry Partnerships

Agent Name & Address:
CBRE

RECOMMENDATION:

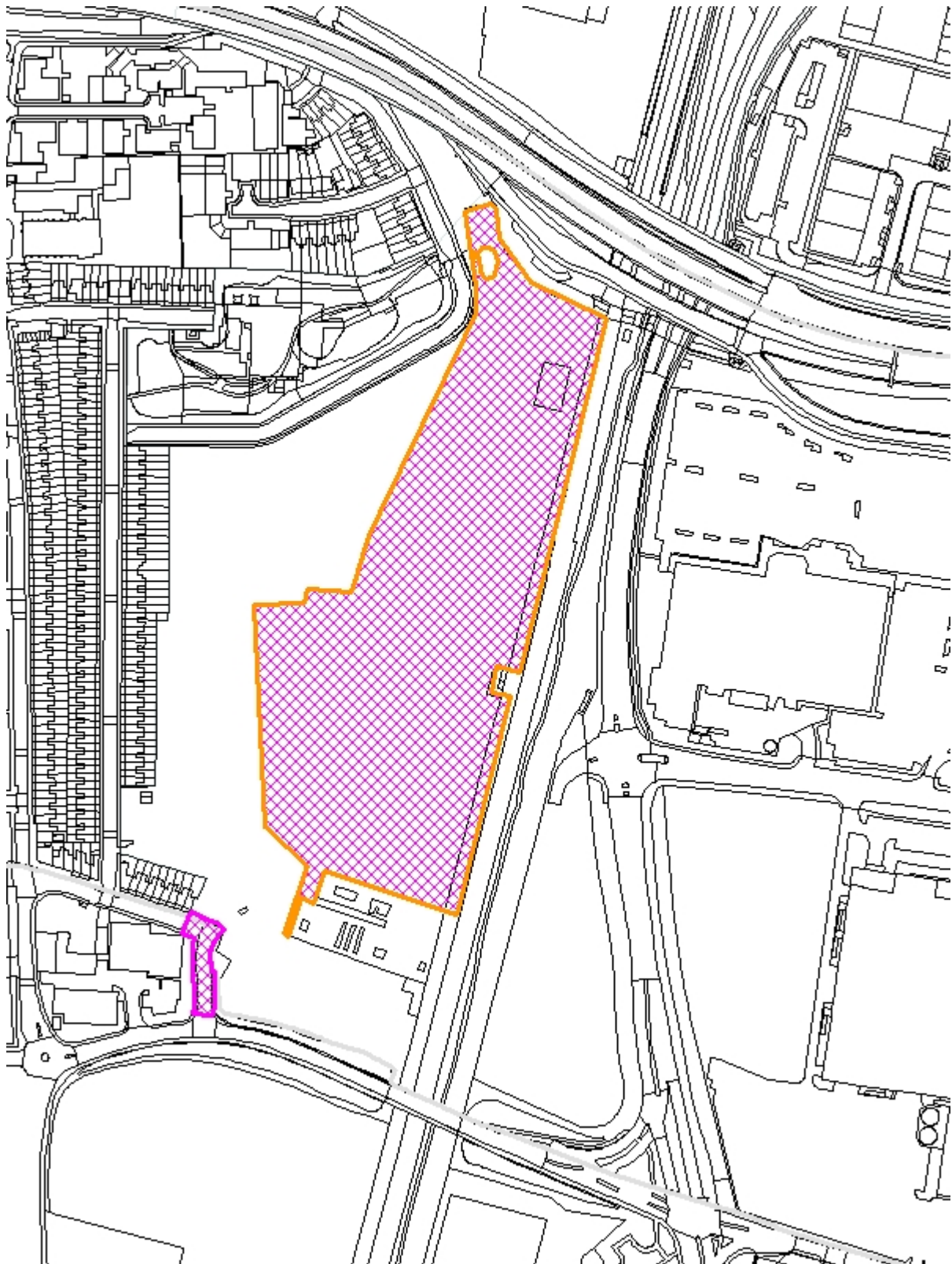
1 That in accordance with Regulation 3 of the Town and Country Planning General Regulations 1992, subject to **NO OBJECTIONS** being received from the Environment Agency, referral of the application to the Greater London Authority and the completion of a S106 Agreement to secure the matters covered in this report, the Head of Development Management be authorised to **GRANT** planning permission subject to conditions.

2 If an **OBJECTION** is raised by the Environment Agency, the Chair, Vice Chair and Opposition Lead will be consulted to determine if any changes required to address the objections require the scheme to be brought back to Planning Committee for decision.

3 That the Head of Development Management be granted delegated authority to finalise the wording of the S106 Agreement and agree the final wording of the conditions to cover the matters in the Recommendation section of this report.

1. Note for Members

Ref: 21/04742/FUL LOCATION: Meridian Water, Willoughby Lane And, Meridian Way, London N18



- 1.1 This planning application is categorised as a 'major' planning application involving more than 10 residential units. In accordance with the scheme of delegation it is reported to Planning Committee for determination.

2. Recommendation

- 2.1. That in accordance with Regulation 3 of the Town and Country Planning General Regulations 1992, subject to NO OBJECTIONS being received from the Environment Agency, referral of the application to the Greater London Authority and the completion of a S106 Agreement to secure the matters covered in this report, the Head of Development Management be authorised to GRANT planning permission subject to conditions.
- 2.2. If an OBJECTION is raised by the Environment Agency, the Chair, Vice Chair and Opposition Lead will be consulted to determine if any changes required to address the objections require the scheme to be brought back to Planning Committee for decision.
- 2.3. That the Head of Development Management be granted delegated authority to finalise the wording of the S106 Agreement and agree the final wording of the conditions to cover the matters listed below.
 1. Time limit
 2. Approved drawings compliance
 3. Phasing details (delivery of plots with appropriate levels of public realm/open space and road infrastructure)
 4. Maximum residential units/housing mix
 5. Maximum/minimum quantum of non-residential floorspace
 6. No fixing of plant, equipment, roller shutters or associated housing boxes to external facades other than in accordance with approved plans
 7. Telecommunications/ Satellite Strategy
 8. Restriction on permitted development for satellite equipment
 9. Restriction on non-residential operating hours
 10. Accessible housing/wheelchair user dwellings
 11. Compliance with Fire Strategy
 12. Details of planting, landscaping, shared podium spaces, public realm, play equipment, enclosure, treatment of perimeter of the site, treatment of roads, pedestrian and cycle routes, traffic calming measures, hard surface materials, furniture and fixtures, signs, wayfinding
 13. Sustainable soil management
 14. Details of tree planting and maintenance
 15. No works to trees and shrubs within bird nesting season
 16. Details of ecological corridor
 17. Details of external materials/sample panels (facing and roof materials, balcony treatments, window material details, boundary treatment, external rainwater goods)
 18. Architectural detail drawings
 19. Shopfront design code
 20. Detail of shopfronts and signage for respective phases
 21. Larger scale details of Plot D tower crown
 22. Details of Plot D tower-top open space
 23. Details of shuttering/doors/gates to vehicular parking
 24. Venetian blinds fronting deck access (Plots B, C and F)
 25. Station Square water feature details
 26. Southern Square light totem details

27. Green roofs
28. Level access for parking adjacent to Plot B
29. Lighting
30. Cycle parking overall provision details
31. Electrical vehicle charging points
32. Car parking management plan
33. Delivery and servicing plan
34. NRMM emissions compliance
35. Piling Risk Assessment
36. Impact piling restriction
37. Acoustic report for mechanical plant
38. Secured by Design accreditation
39. Secured by Design certification
40. Secured by Design commercial certification
41. SuDS details
42. SuDS verification
43. Construction Logistics Plan
44. Construction Environmental Management Plan (including pedestrian and bicycle access)
45. Site Waste Management Plan
46. Operational Waste Management Plan
47. Construction Waste Management Plan
48. Control of Working Hours and Deliveries to Site
49. Water efficiency
50. Thames Water – Water Network Upgrades
51. Restriction on construction within 5m of water main
52. Installation of internal blinds in accordance with the Overheating Report (July 2022)
53. Energy strategy compliance
54. Energy technical note
55. Energy verification/performance certificates
56. Whole Life-cycle Carbon technical report
57. Circular Economy Statement
58. Urban Greening Factor
59. Compliance with ES and identified mitigations
60. Contamination and remediation (including foundation risk assessment and ground gas measures)
61. Previously unidentified contamination
62. Details of levels
63. Wind assessment and mitigation of amenity areas
64. Wind assessment and mitigation of Meridian Water Station entrance
65. Double glazing specification
66. Meanwhile Use Strategy
67. Pymmes Brook Buffer Zone Details
68. Details of works to Pymmes Brook
69. Eradication strategy for invasive species
70. Bird and bat boxes

3. Executive Summary

- 3.1. Meridian Water is a major regeneration project led by the London Borough of Enfield. Over 25 years, the ambition is to create 10,000 homes and 6,000 jobs, including thousands of affordable homes. Construction on Phase 1a, to the west of the subject Application Site, began summer 2021 following the opening of Meridian Water rail station in 2019. Meridian Water is in Upper Edmonton, within

walking distance of Edmonton Green and Angel Edmonton. It is bordered by Lee Valley Regional Park. The entire masterplan area comprises approximately 85 hectares and is one of the largest developable sites in North London.

- 3.2. In July 2017, outline planning permission was granted for the development of Meridian Water Phase 1 for 725 residential units, a new station and associated infrastructure, 950 sqm retail floorspace, 600 sqm of community floorspace and 750 sqm of leisure floorspace, along with public open space and children's play provision. A minimum of 25% of units were agreed to be affordable.
- 3.3. Since the outline planning permission was granted, the Council was successful in its bid for funding from the Government's Housing Infrastructure Fund, which allocated monies for the delivery of rail works, road infrastructure, flood alleviation and utilities to deliver up to 10,000 homes at Meridian Water. The Meridian Water West Anglia Main Line station opened in 2019, improving the site's connectivity.
- 3.4. In 2020, the Council and the applicant for this proposal, Vistry Partnerships, signed a Development Agreement (DA) for Phase 1. The Council remains landowner of the site. The DA stipulates a commitment to provide 50% affordable housing across the whole of Phase 1.
- 3.5. In May 2021, permission was granted for reserved matters related to Phase 1a (20/03821/RM), setting out scale, layout, external appearance and landscaping for the first 300 units, contained in Plots A and E, and arranged across buildings from 3 to 12 storeys in height. 272 of the 300 units in Phase 1a are affordable, comprising affordable rent and shared ownership homes.
- 3.6. This application is for Phase 1b, the remaining, eastern segment of Phase 1 (the Application Site). The proposal is for 676 additional homes. This is above the balance of 425 homes consented pursuant to the Phase 1 outline permission. As the application includes an uplift of residential units (additional 251 homes) and an increase in the proportion of affordable housing across all of Phase 1, the present application is a full, stand-alone application, rather than a reserved matters application.
- 3.7. The application is for 676 residential units, 1,209 sqm flexible commercial floorspace, a 563-sqm Use Class E(e) medical facility and a 809-sqm Use Class E(d) leisure space. Additionally, the development includes over 8,000 sqm of public open space across three new major squares and parks, and public realm that supports sustainable travel.
- 3.8. The proposal seeks to extend the provision of housing by making more efficient use of land and providing high quality of homes in an area that has been identified as being suitable for higher density growth, adjacent to the Meridian Water rail station.
- 3.9. With this application, 50% of homes across Phase 1 will be affordable, split across London Affordable Rent and shared ownership tenures.
- 3.10. Pre-application discussions have shaped the development to the extent that officers are satisfied that the principles of the proposed scheme are appropriate and have the ability to provide benefits in accordance with the development plan.
- 3.11. The applicant has raised viability challenges associated with delivery of the development in light of rising construction costs and associated market conditions.

The applicant recently provided a full viability appraisal and this has been independently reviewed. The appraisal confirms that with the delivery of 50% affordable housing, the scheme is in deficit. Notwithstanding this, the applicant has indicated a willingness to make S106 contributions but has not yet made a complete proposal. An update will be provided on this before the meeting. Accordingly, the full benefits of the proposal are not presently known. However, the applicant has confirmed that the full Off-Site Open Space Enhancement and Maintenance Contribution (which includes monies towards Suitable Alternative Natural Greenspace mitigations) and Habitats Regulations Strategic Access Management and Monitoring Plan payments will be made in full, as set out in the table in Section 24 of this report.

- 3.12. Also under review is assessment of flood risk to the site, particularly that which is associated with naturalisation measures proposed to Pymmes Brook. Officers expect that the Flood Risk Assessment will suitably mitigate any flood risk associated with these works.
- 3.13. These matters continue to form a part of the consideration of the planning balance and an update will be provided to the Committee.
- 3.14. The primary public benefits of the scheme at this stage can be summarised as follows:
 - Optimising the site – making effective use of a brownfield site
 - Making a significant contribution to the Borough’s housing target, with the delivery of 676 homes
 - Delivery of 218 affordable homes, bringing the total across Phase 1 to 491 affordable homes
 - Three new major public open spaces of varying characters and opportunities for leisure
 - Inclusion of a medical space to be offered as an NHS GP surgery
 - A sustainable and high-quality public realm with vibrant ground floor commercial spaces
 - On-site ecological enhancements, including an Ecological Corridor and Pymmes Wood open space
 - S106 contributions towards improvements to open space and public realm
 - Connection to the Enfield District Heat Network
 - Integration of on-site sustainable urban drainage measures

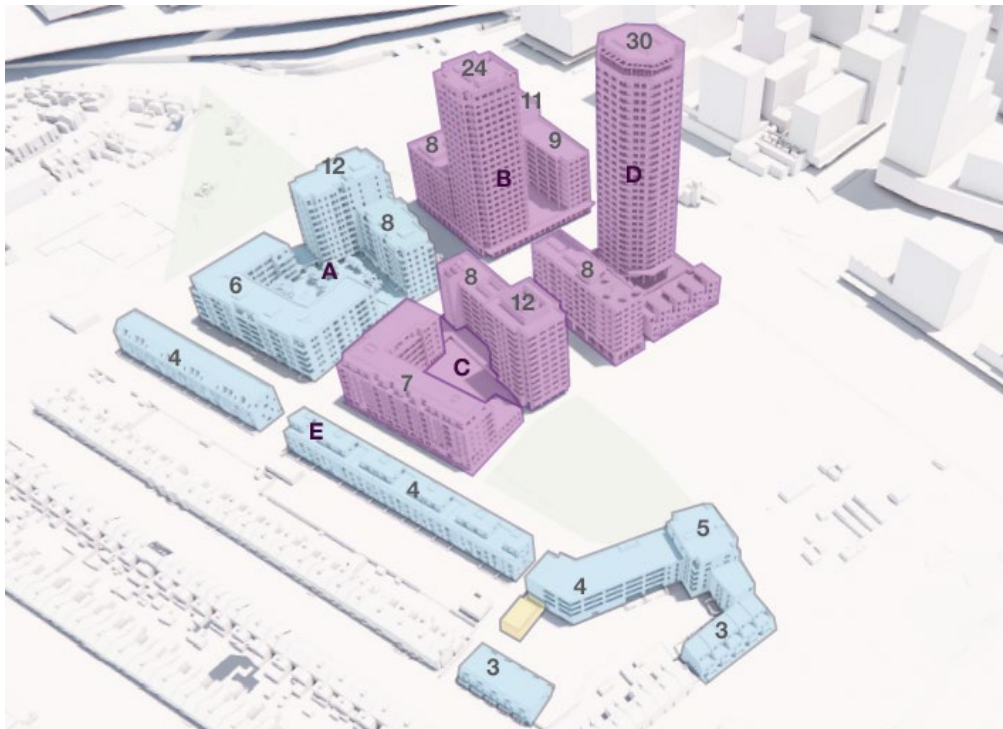
4. Site and surroundings

- 4.1. The Application Site, Meridian Water Phase 1b, forms the eastern section of the larger Phase 1 site. Phase 1a, which has been granted permission pursuant to reserved matters application, lies to the west of Phase 1b. Together, phases 1a and 1b form Phase 1, which extends to approximately 8 hectares and is located at the westernmost end of the Meridian Water masterplan area. Phase 1b is approximately 3.99 hectares in area and is presently vacant, having previously been used for the storage of gas. Following decommission and removal of the gas holders, the site was remediated by Enfield Council.
- 4.2. Phase 1b is immediately bordered to the north by the A406 North Circular Road, with a section of the Pymmes Brook just inside the site. The West Anglia Main Line and Meridian Water station form the eastern boundary of the Application Site;

to the south is a meanwhile use plot within the Phase 1 outline application, which has been approved to be a construction skills centre. To the west is Phase 1a, which is bounded to its west by the Edmonton residential neighbourhood.

5. Proposal

- 5.1. The application is for the development of three plots on Phase 1b: Plots B, C and D with commercial ground floors and residential units above. The proposal additionally delivers three new open spaces as part of the Phase 1 masterplan. Plots A and E have been consented through the Phase 1a reserved matters application. Together, Plots B, C and D (in addition to Plot A on Phase 1a) form a quadrant site plan with the West Anglia Main Line running north-south on the eastern boundary and Angel Edmonton neighbourhood to the west, and open spaces to the north and south.
- 5.2. In all, Phase 1b will deliver 676 residential units, 1,209 sqm flexible commercial floorspace (Use Class E a, b, c, g), a 563-sqm Use Class E(e) medical facility on Plot B and a 809-sqm Use Class E(d) leisure space Plot C.



- 5.3. The public realm and open space configuration generally forms an axis with Station Square in the centre between Plots B and D, a place of arrival from Meridian Water Station. Running north-south is the new Park Street, which extends from the North Circular Road to Leaside Road. Pymmes Wood open space is proposed at the north end of Phase 1b and Southern Park is located at the southern end.
- 5.4. Plot B comprises a ground floor with commercial space fronting Station Square and a medical facility on the east side. Residential lobby and amenity front Park Street. The ground floor roof is landscaped with a shared residential podium garden, which also forms the base for shoulders of between nine and eleven storeys, and a tower in the southwest corner (at the corner of Park Street and

- Station Square). Plot B includes 232 units in total made up of London Affordable Rent, market sale and shared ownership tenures.
- 5.5. Plot C is located on the west side of Park Street, just south of Plot A in Phase 1a. Plot C also has a single storey base with leisure space on the east side fronting Park Street. The ground floor is wrapped on the north, west and south sides with three-bedroom, family homes given the quieter location adjacent to Southern Park and larger homes already located on Phase 1a. There is also a shared podium garden in the centre of the building arrangement with seven and twelve storeys located around. The 161 residential units comprise market sale and London Affordable Rent homes.
 - 5.6. Plot D is located in the south-eastern corner of the quadrant. The ground floor includes commercial units along Park Street and facing Station Square. Entrances to four-storey townhouse residences are on the south side of the block. There is a shared podium amenity space on the first floor, rising to an eight-storey shoulder along Park Street and a 30-storey tower nearest the trainline. There are 283 units on Plot D for private sale and private rent.
 - 5.7. It should be noted that the applicant has submitted a concurrent application for one additional affordable home on Phase 1a (22/00106/FUL). The housing numbers for Phase 1 and Phase 1a, as represented in this report, assume the inclusion of this one unit.
 - 5.8. In sum, Phase 1b proposes 676 homes (251 more than the Phase 1 outline permission). This brings the total number of homes on Phase 1 to 977, with 50% affordable and 50% market-rate. The affordable tenures include 49% London Affordable Rent and 51% shared ownership.
 - 5.9. Vehicle parking, cycle parking and servicing for all residential buildings will be available on ground floors beneath podia and accessible from driveways on side streets. Some servicing bays are located on Park Street.
 - 5.10. It should be noted that the red line boundary of the Application Site includes two plots that are intended to host meanwhile uses: one site north of Plot B and one site south of Plot D. This application does not include any proposal for the use of these plots and the use of these areas of the Application Site is not for consideration within this application. Officers are aware, however, that there is an intention to use the northern site as a community garden meanwhile use, together with the provision of a marketing suit for the overall development and temporary energy centre and the southern site as a construction skills centre meanwhile use. These have been or are the subject of separate planning applications.

6. Environmental Review

- 6.1. The planning application represents EIA development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (EIA Regulations) and is accompanied by an Environment Statement (ES). An Environment Statement and supplementary Environment Statement were prepared in consideration of air quality, external daylight, sunlight, overshadowing and solar glare, ecology, greenhouse gas and climate change, ground conditions, noise and vibration, socio-economics, TVIA, transport, wind and water resources in respect of Pymmes Brook.

- 6.2. The findings of the ES as revised are discussed in the body of this report as necessary. Mitigation measures identified therein will be secured by planning condition and/or through the S106 Agreement.

7. Relevant Planning Decisions

Application Description	Reference	Status
Development of Phase 1 of Meridian Water comprising up to 725 residential units, new station building, platforms and associated interchange and drop-off facilities including a pedestrian link across the railway, a maximum of 950 sqm retail (A1/A2/A3), floorspace, a maximum of 600 sqm of community (D1) floorspace, a maximum of 750 sqm of leisure (D2) floorspace, associated site infrastructure works including ground and remediation works, roads, cycle-ways and footpaths, utility works above and below ground, surface water drainage works, energy centre and associated plant, public open space and childrens play areas, and various temporary meantime uses without structures (landscaping and open space).	16/01197/RE3	Approved 10.07.2017
Submission of reserved matters pursuant to condition 5, part (i) of outline planning permission ref: 16/01197/RE3 in respect of Layout in relation to the Station Building Site only for the new Station Building and platform (to replace Angel Road Station) including a pedestrian link across the railway at the Phase 1 site.	17/02952/RM	Approved 15.09.2017
Erection of a Pressure Reduction Station (PRS) with associated parking, landscaping and access from Albany Road.	17/05006/RE4	Approved 23.01.2018
Details of Reserved Matters (scale, layout, external appearance and landscaping) for 300 units in respect Plots E and A (Phase 1a) arranged across buildings from 3 to 12 storeys in height pursuant to condition 5 of planning permission 16/01197/RE3 dated 10 July 2017 for development of Phase 1 of Meridian Water comprising up to 725 residential units, new station building, platforms and associated interchange and drop-off facilities including a pedestrian link across the railway, a maximum of 950 sqm retail (A1/A2/A3), floorspace, a maximum of 600 sqm of community (D1) floorspace, a maximum of 750 sqm of leisure (D2) floorspace, associated site infrastructure works including ground and remediation works, roads, cycle-ways and footpaths, utility works above and below ground, surface water drainage works, energy centre and associated plant, public open space and childrens play areas, and various temporary meantime uses without structures (landscaping and open space). Application includes details pursuant to condition 29 (green procurement plan), condition 63 (biodiverse roof details), condition 65 (Energy statement), condition 86 (wind assessment), condition 71 (cycle parking details) and 73 (car parking details) of the above permission.	20/03821/RM	Approved 24.05.2021
Construction of 3 x single-storey modular buildings to provide a construction skills academy (within use Class F1), together with ancillary structures, external training areas, landscaping, cycle storage and other associated works (temporary permission sought for just over 10 years).	21/02991/FUL	Not yet determined
Erection of one residential unit (Use Class C3) arranged across one building at Meridian Water Phase 1.	22/00106/FUL	Not yet determined

8. Consultations

Pre-Application Consultation

- 8.1. The pre-application consultation was carried out in September 2020, December 2020 and September, May, July 2021, before the application was submitted in December 2021. Due to Covid-19 restrictions the consultation events took place as a webinar format with the opportunity to ask questions.
- 8.2. In September 2020 the initial consultation introduced the site-wide proposals. This took place on 3 days: 5, 8 and 9 September. Following this, consultation events on 3, 4, and 5 December 2020 focussed on Phase 1B. Events on 21, 22, and 23 July also focussed on Phase 1B and the progress of the design.
- 8.3. The applicant identified a consultation area including 4,781 addresses, and also consulted all London Borough of Enfield Councillors. As of January 2021 the consultation events generated 19 responses, based on the questionnaire produced. As of September 2021 a further two completed questionnaires were received.
- 8.4. Community stakeholders were consulted. Members of the Planning Committee were briefed on 27 July 2021 and two meetings took place with REACT on 28 July 2021 and 30 November 2021. Other stakeholders included the Enfield Society, Meridian Angel Primary School, and St John's Church on Dysons Road.
- 8.5. The Applicant's submitted Statement of Community Involvement submitted as part of the planning application describes the response to community engagement as conveying support for the proposal, with interest and questions around the mix and tenure of the housing, the heights of the blocks and security.

Enfield Place and Design Quality Panel (DRP):

- 8.6. The proposed development was brought to the Enfield Place and Design Quality Panel (hereby referred to as DRP) on 30 April 2020, 13 August 2020, 01 and 08 April 2021. A summary of the conclusions made, along with officer comment as to the degree to which the applicant has addressed DRP conclusions is outlined below:

01 and 08 April 2021

- *The landscape and public realm proposals are greatly improved and in a good position.*
- *Station square has positively evolved but the design team is encouraged to review the microclimate mitigation approach, drop off and parking arrangement, access of vehicles to the health centre and a more organic approach to the layout of the square.*

Officer comment:

Microclimatic testing was completed as part of the planning submission. Wind baffles and trees have been introduced in the square to address potential issues, and these are considered acceptable.

Any drop off/service bays nearest Station Square have been addressed to ensure pedestrian conflicts are minimised. There is an ambulance bay located nearest the medical space in Plot B, and refuse and delivery bays are accommodated within the podia.

The Station Square is designed with a variety of zones arranged around desire lines. There is less of an orthogonal layout, creating a more organic and informal design, while still maintaining various functions.

- *The streets to the north of Plot B and A appear to be designed for the car, although likely to have low usage by vehicles. This design should be amended to include pedestrian friendly crossing and playspace – more akin to Park Street.*

Officer comment: The street north of Plot B (which is in the red line boundary of this application) has been amended to accommodate trees and crossing points. As many parking spaces and loading bays as possible have been located in building podia. In light of the low provision of parking in this application, the level of parking accommodated in these streets is considered acceptable.

- *Relocating the health centre to the east of Plot B is a positive move and there could now be active frontage and activity to Park Street. However, there are issues remaining with predominance of gym frontage on Plot C and the lack of an active use (café for example) facing onto the southern park.*

Officer comment: There is a borough-wide need to deliver family housing, and finding appropriate locations for housing in higher-density developments presents challenges. The location of a residential lobby and larger, family-sized units opposite Southern Park presents an appropriate location for family homes. A condition is recommended for shopfront details that will help to ensure that the leisure facility frontage is engaging and consistent with other ground floor spaces.

- *Phasing should be planned to allow the maximum amount of public realm and landscape to be delivered in order to maximise public benefit. In particular the square must come forward as one as early as possible.*

Officer comment: A condition is recommended that requires the proposal to be delivered in accordance with phasing plans that will ensure commensurate benefit (such as open space, community facilities) are delivered with Plot construction.

- *The panel is supportive of the proposed meanwhile use on the blocks outside of the application boundary and this has allayed concerns over the use of Meridian One – subject to future details.*
- *The podium gardens are improved but there are still issues around relying on playspace provision (for the whole scheme) with these. These should be seen as a bonus.*

Officer comment: There is play space integrated throughout the scheme, with elements on Station Square, Park Street, large playable space on Southern Park. Phase 1a delivers the largest share of play space for children of all ages. Play

provision has been reviewed by officers and adequate amounts and a good quality are being provided.

- *Plot C and D both feature triplex / duplex units. There is scope for the units in Plot D to be more clearly distinguished from the rest of the podium buildings either through addition of an extra storey or more spacing between the adjacent, taller elements.*

Officer comment: Changes to the detailed design of four-storey units better integrate the maisonettes with the remainder of the block. While there is a difference in scale, this is considered acceptable, particularly because this allows sunlight into the podium courtyard space.

- *Plot D uses the same materiality for the tower and the linear building on Park street. These should be differentiated so that one is reserved for the tower – visible from far views and the other for the scale of the street and southern park. The proposed approach is more appealing on the tower, whereas it emphasises horizontality on the linear block.*

Officer comment: The towers and linear block now include materiality that distinguishes them. Overall, the architecture is high quality and supported.

- *Cycle provision generally seems good but there are specific issues in Plot D and C.*

Officer comment: Cycle storage has been reviewed by transport officers and Transport for London. Details of cycle parking are recommended to be required by condition.

Greater London Authority (GLA):

- 8.7. Meetings were held with the GLA and Transport for London on 8 July 2020, 9 February 2021 and 21 September 2021. The GLA were supportive of the principle of increasing the number of units on the wider 1B site to optimise the development potential, and the proportion of affordable housing, with the phase being eligible for the 'Fast Track Route'. The GLA identified that the level of affordable housing and the proportion of family housing could be considered alongside the amount on the wider Phase 1.
- 8.8. The height and massing strategy was supported with the taller elements marking important street corners and the station square. The GLA were supportive of further work on children's play space. Detailed comments were made regarding activation at ground floor from commercial units, daylight received by proposed flats and dual aspect units.

Transport for London (TfL)

- 8.9. TfL identified that buses are unlikely to be operating through the site in the future and so the design and layout of the road network should prioritise pedestrian and cycle access, and servicing. A development that provides minimal car parking is supported. Cycle parking should be provided in accordance with the London Plan 2021.

Environment Agency (EA)

- 8.10. Two meetings were held with the EA on 22 February and 25 October 2021. The EA asked the applicant to explore design options for the naturalisation of Pymmes Brook involving the removal of all concrete, including the concrete banks and mid-channel concrete wall. A standalone Flood Risk Assessment (FRA) would be required, including the appropriate baseline and the allowance for climate change.

Secured by Design

- 8.11. Workshops were held with the Metropolitan Police on 21 May 2021 and 11 October 2021. Discussions concerned several aspects of the development including passive surveillance, window and door specifications, service yards / car parks, communal entrance lobbies and cycle stores.

Public Consultation

- 8.12. Public consultation as a result of this planning application involved notification letters being sent to 1,114 neighbouring properties 5 January 2022, a press advert in the Enfield Independent was published 5 January 2022 and 11 May 2022 (with the submission of a supplementary Environment Statement) and 5 site notices were erected 5 January 2022 and again 30 June 2022 (with the submission of a supplementary Environment Statement).

- 8.13. As a result of public consultation, four representations were received, and a summary of reasons for comment is below:

- *Single staircase is not fire safety compliant*

- 8.14. Officer response: The application has been subject to rigorous review by the Health and Safety Executive (HSE), which is the statutory consultee on fire safety for buildings over a certain height. The HSE has undertaken review of the application and the applicant made necessary amendments to comply with fire regulations.

- *Housing offer is predominantly market tenure and does not meet local housing need*

- 8.15. Officer response: The Phase 1 outline application approved 725 residential units of which 25% would be affordable. Following the reserved matters application for Phase 1a, the quantum of housing on Phase 1 was reconsidered and the proposal for the balance of housing on Phase 1b was increased to deliver a total of 977 residential units and a proportion of 50% affordable housing. 50% affordable housing meets London Plan affordable housing targets for publicly owned sites.

- *Insufficient number of family-sized homes*

- 8.16. Officer response: The assessment of unit size mix proposals is based on local evidence of need. The most recent evidence for Enfield indicates that there is the greatest need for 2- and 3-bedroom homes among affordable rent tenures and 3- and 4-bedroom homes among market tenures. 55% of the London Affordable Rent homes provided on Phase 1b are 3- (and some 4-) bedroom homes. It is true that the proportion of larger units among market-rate homes deviates from the evidenced need, with an offer of mostly 1- and 2-bedroom units. Given various site constraints and the priority to provide the highest proportion of affordable

family-sized units, officers acknowledge that the market-rate share of homes does not meet family-sized housing targets but consider that in the overall planning balance this is acceptable.

- *Shared Ownership should not qualify as an affordable housing tenure*

8.17. Officer response: The London Plan includes the most recent policy on affordable housing in the development plan at present. London Plan Policy H6 sets out the split of affordable products that should be applied to residential proposals. This includes a minimum of 30% low-cost rented homes and a minimum of 30% intermediate products, including namely London Living Rent and London shared ownership. The present application proposes 50% low-cost rented units and 50% shared ownership homes as part of the affordable housing offer. This tenure split is policy-compliant.

- *Homes in towers may be affected by the plume from the Edmonton incinerator*

8.18. Officer response: the Environmental Health Officer has commented that the plume goes very high into the atmosphere, due to the efflux velocity of the gases leaving the stack. This is the intention so that the gases disperse over a wide area and the dilution with air results in concentrations falling rapidly from the point of emission.

- *The open spaces are too small in relation to the number of additional homes*

8.19. Officer response: This application for Phase 1b proposes three new, major open spaces on Phase 1: Pymmes Wood, Station Square and Southern Park. This is in addition to the Northern Park already approved on Phase 1a. Additionally, the proposal includes an ecological corridor, new trees, greening of public realm, landscaped building podiums and private outdoor amenity. In all, Phase 1 will consist of 1.29 hectares of open space. This is a proportion of 0.58 ha/1,000 residents on Phase 1a, which is considered to be acceptable and appropriately balances provision of open space with the need to accommodate housing on the site.

- *Development too high*

8.20. Officer response: Policy DMD 43 of the Development Management Document resists tall buildings in areas classified as inappropriate, including within and adjacent to the Green Belt, or where heritage assets would be affected. The site is not near the Green Belt or heritage assets. Sensitive locations include locations where development would infringe or detract from important local views, or areas where the existing development is good quality and relatively homogeneous, and the wider area is not considered to be sensitive. Whilst there are streets of residential houses to the west, there are also larger scale commercial and industrial properties to the south-west and east. Therefore, this is not considered to be a location sensitive to tall buildings. The applicant has provided a detailed analysis of the area and justification for a tall building in this location. Policy DE6 of the emerging Enfield Local Plan outlines that the principle of tall buildings will be supported in appropriate locations and that different definitions of "tall buildings" are used throughout the Borough to reflect local context. Figure 7.4 within Policy DE6 identifies areas where tall buildings could be acceptable (subject to compliance with outlined criteria). Although not adopted as policy and having limited weight, Figure 7.4 is the most recent assessment of tall building locations

within Enfield planning policy. The Application Site is identified within Figure 7.4, further indicating that the Application Site is appropriate for tall buildings.

- *Increase danger of flooding*

- 8.21. Officer response: The application has undergone review by the Environment Agency (EA) and the Lead Local Flood Authority (LLFA) following the preparation of flood models and Flood Risk Assessment.

The EA objected to the application on the basis that the Flood Risk Assessment provided in May 2022 was unacceptable, the applicant has not sufficiently addressed issues of contaminated land and the applicant has not demonstrated an acceptable naturalisation of Pymmes Brook. The EA acknowledges that the applicant has since suitably addressed the matter of contaminated land and has removed this objection, although conditions related to contamination are expected to be recommended.

The most recent flood model (submitted August 2022) accounts for the conditions on the site pre-development, that is, absent any of the proposed development. The EA has accepted this model. Additional models have been issued to the EA on 5 September, including one that includes the development and some elements of naturalisation to the Pymmes Brook, including mid-channel wall removal and lowering of the southern bank wall and associated mitigation; another adds further naturalisation features such as gravels on the watercourse bed, shelves along the bank and planting. The EA has completed review of the models that are most pertinent to the proposal and has identified several “Amber” issues. The EA has expressed confidence that these issues can be addressed by the applicant with further work in order for the EA to be able to accept the flood models. The applicant also submitted a Flood Risk Assessment on the 5 September for review by the EA and LLFA. The EA and LLFA have raised initial comments and points of clarification for the applicant, and are liaising closely with the applicant’s hydrology consultants. Again, the EA expressed confidence that the remaining issues can be resolved by the applicant in order to enable the EA and LLFA to recommend conditional approval. Officers will provide an update in advance of the meeting of the Planning Committee.

- *Loss of privacy*

- 8.22. Officer response: It is unclear from this comment what loss of privacy is specifically a concern. The present development, Phase 1b, occupies a site that is not immediately adjacent to any existing residential properties. It is bounded by the West Anglia Main Line on the east, Pymmes Brook and the North Circular Road on the north, Meridian Water 1a to the west (which is presently under construction) and Leaside Road to the south. The proposed development does not introduce any direct overlooking onto residential windows or private spaces.

- *Out of keeping with character of area*

- 8.23. Officer response: The character of the area is varied. There are residential streets to the west, but to the south-west there are commercial and industrial properties on a greater scale. To the east, beyond the railway and Angel Edmonton Road there are large scale retail and other commercial properties. Hence, there is not a uniform character. The proposed development forms part of the wider Meridian

Water regeneration which will have its own character, and the proposed development is a contributing component to this.

- *Over development*

8.24. Officer response: The Phase 1 outline application secures 725 homes on the whole of Phase 1. The Phase 1a reserved matters application was approved for 300 units on that part of the site. There remain 425 units to implement on the remainder of the site under the outline permission. On Phase 1 as a whole, 725 units is a density of 101 units/hectare. With the present application and increase in units to 977 across Phase 1, the proposed density is increased to 136 units/hectare. In light of the Application Site's immediate adjacency to the Meridian Water station, the increasing levels of investment in transport infrastructure at Meridian Water and the increased level of affordable housing (from 25% to 50%) that comes with the proposed uplift in residential units, this resulting density is appropriate for this location.

- *Strain on existing community facilities*

8.25. Officer response: The present proposal includes provision of an on-site medical space that the NHS Clinical Commissioning Group has found to be of a suitable size to meet the needs of Phase 1 residents. The application also delivers a leisure space that is likely to be occupied by a gym. The S106 agreement will secure a contribution to education facilities.

Statutory and Non-Statutory Consultees

8.26. GLA

The GLA issued a Stage 1 report supporting the optimisation of housing capacity on the brownfield site. The GLA acknowledges and supports the delivery of 50% affordable housing across the whole of Phase 1, including Phase 1a and the present Application Site, Phase 1b. An early stage viability review mechanism is required. The layout, design, landscaping, public realm and architectural and residential quality is of a high standard and is strongly supported. The site is identified as suitable for tall buildings and complies with London Plan Policy D9. The GLA recommended further consideration of bus capacity, which was subsequently addressed by the applicant. The connection to the DEN and approaches to greening and drainage were also supported.

8.27. Education

No comment received. There is an education contribution secured via S106 agreements stemming from the Phase 1 outline planning permission. The contribution for Phase 1A is secure. The applicant has represented that viability for this development has become increasingly challenged and has provided a full viability appraisal that the Council is assessing. Any further contribution over and above what has already been agreed for Phase 1A will be subject to review of the development's viability.

8.28. Environmental Health

The Environmental Health officer does not object to the application for planning permission and finds there is no significant adverse impact that cannot be addressed through mitigation measures that have been conditioned.

Construction dust is likely to be an issue for existing residents. The air quality assessment puts forward suitable measures to control dust; these measures must be implemented to control dust during construction and demolition.

A series of conditions related to emission standards for all Non-Road Mobile Machinery (NRMM), contamination and acoustics associated with the mechanical plant are recommended and these are included in the list of conditions set out above.

In order to ensure remediation is completed, conditions are required to protect against risks arising from contamination.

Conditions are recommended that protect existing residents from excess noise from piling and that noise control measures are in place when mechanical plant has been selected.

Conditions are recommended to cover all matters identified.

8.29. Traffic and Transportation

Overall, the proposed approach to traffic and transportation matters is acceptable and meets relevant policy requirements. The applicant has provided a study to locate additional bus stops along Leaside Road; the provision of these will be secured via S106. A series of conditions is recommended to address construction logistics, cycle and vehicle parking, delivery and servicing, parking management and travel plan monitoring.

8.30. Transport for London

TfL is generally supportive of the proposal with the inclusion of conditions that address car parking management plan, delivery and servicing plan, travel plan and construction logistics plan. TfL is interested to ensure that bus network accessibility is provided in the form of additional stops on Leaside Road. The applicant has provided a Leaside Road Bus Stop Options Review (19 April 2022), the details and implementation of which is being secured by S106.

8.31. Haringey Council

The proposed additional bus stops to serve Phase 1 are proposed on Leaside Road on Haringey Council highway. Haringey borders the Application Site immediately to the south. Haringey officers are supportive of the provision of bus stops as set out in Leaside Road Bus Stop Options Review (19 April 2022) and recommend stipulations for the delivery of the bus stops that will be secured via S106.

8.32. Health and Safety Executive

HSE is the statutory fire safety consultee for buildings over a certain height. HSE undertook a rigorous review of the proposal and highlighted an issue of single access for residential uses being shared with ancillary uses, such as waste and bicycle storage. The applicant revised the ground floor plan to separate these uses to HSE's satisfaction. HSE supports the development.

8.33. SuDS Highways

Officers are generally supportive of the SuDS approach and recommend conditions, which are included in the list set out above. Officers presently object to the flood mitigation strategy on the basis that the previously submitted Flood Risk Assessment and the proposal for naturalisation of Pymmes Brook have not sufficiently addressed flood risk. The current position is set out within the relevant section of this report and this issue remains under active discussion with the applicant. An update will be provided at the meeting

8.34. Environment Agency

The EA originally objected to the application on 11 February 2022 and subsequently maintained its objection on the basis that the Flood Risk Assessment provided in May 2022 was not acceptable, the applicant had not sufficiently addressed issues of contaminated land and the applicant had not demonstrated an acceptable proposal for naturalisation of Pymmes Brook. The EA acknowledges that the applicant has since suitably addressed the matter of contaminated land and has removed this objection, although it is expected that conditions associated with contamination will be recommended.

The most recent flood model (submitted August 2022) accounts for the conditions on the site pre-development, that is, absent any of the proposed development. The EA has accepted this model. Additional models have been issued to the EA on 5 September, including one that includes the development and some elements of naturalisation to the Pymmes Brook, including mid-channel wall removal and lowering of the southern bank wall and associated mitigation; the other adds further naturalisation features such as gravels on the watercourse bed, shelves along the bank and planting. The EA has completed review of the models that are most pertinent to the proposal and has identified several "Amber" issues. The EA has expressed confidence that these issues can be addressed by the applicant with further work in order for the EA to be able to accept the flood models. The applicant also submitted a Flood Risk Assessment on the 5 September for review by the EA and LLFA. The EA and LLFA have raised initial comments and points of clarification for the applicant, and are liaising closely with the applicant's hydrology consultants. Again, the EA expressed confidence that the remaining issues can be resolved by the applicant in order to enable the EA and LLFA to recommend conditional approval. Officers will provide an update in advance of the meeting of the Planning Committee.

8.35. NHS London Healthy Urban Development Unit

HUDU does not raise objection to the proposal subject to a S106 provision securing delivery of the shell and core for the health facility on the ground floor of Plot B. In its review, HUDU applied a calculator that assesses the financial impact of a scheme. In this instance the calculator identified a contribution of £940,000 arising from the proposal for Phase 1b. On the basis that the value of the medical space being delivered exceeds the calculated contribution, the proposal sufficiently offsets the identified contribution. The delivery of the medical space will be secured within the S106 Agreement.

8.36. Clinical Commissioning Group:

The CCG does not raise objections to the proposal for Phase 1b on the basis that a medical space is being provided that the CCG confirms is of an adequate size to meet the needs of the population introduced by the subject proposal. The

CCG does note a comprehensive approach needs to be taken to delivering necessary healthcare facilities for the whole of Meridian Water beyond this phase of development and this will need to be taken forward outside the remit of this application.

8.37. Historic England (GLAAS):

Historic England concluded that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest and no further assessment or conditions are therefore necessary.

8.38. Natural England:

On receipt of a Habitats Regulations Assessment (HRA), to understand the development's impacts on the Epping Forest Special Area of Conservation (SAC), Natural England have confirmed no objection to the development concluding the identified impacts on the SAC can be appropriately mitigated with measures identified within the HRA and secured via planning obligation. The S106 will secure these measures.

8.39. Metropolitan Police (Secured by Design):

The Metropolitan Police Service Designing out Crime Unit supports the proposal subject to appropriate conditions and informatives. Conditions are included in the list above.

8.40. Thames Water:

On the basis of information provided, Thames Water would advise that with regard to surface water network infrastructure capacity/foul water sewerage network infrastructure capacity, they would not have any objection to the planning application subject to a series of appropriate conditions/informatives. Conditions as recommended are included in the list above.

8.41. Sport England

Sport England is not a statutory consultee, however requested that the applicant provide an assessment of sporting provision in the vicinity of the proposed development to identify any need arising from the proposal. The applicant provided a description of local facilities and underscored that the proposal includes provision of a leisure space.

Officer comment: London Plan Policy S5, Enfield Core Strategy Core Policy 11 and the emerging Enfield Local Plan policies SP PL5 and SP CL4 set out the strategic responsibility of the Council to ensure adequate provision of leisure and recreational facilities based on assessment of need. In response to the request by Sport England to demonstrate local provision, the applicant prepared a summary of local facilities and reaffirmed the inclusion of a leisure space on the ground floor of Plot C as part of the present proposal. Officers accept that the application provides a leisure space that will contribute to sports provision. The existing S106 agreement stemming from the Phase 1 outline permission secures a contribution towards open space improvements that could further support new/enhanced leisure facilities. Although subject to further viability evaluation, any additional open space contributions commensurate with the uplift in residential units will be secured via a new S106 agreement.

9. Relevant Policy

National Planning Policy Framework 2021

- 9.1. The National Planning Policy Framework (NPPF) introduces a presumption in favour of sustainable development. In this respect, sustainable development is identified as having three dimensions - an economic role, a social role and an environmental role. For decision taking, this presumption in favour of sustainable development means:
- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
 - c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 9.2. The NPPF recognises that planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF does not change the statutory status of the development plan as the starting point for decision making.
- 9.3. In relation to achieving appropriate densities paragraph 124 of the NPPF notes that planning policies and decisions should support development that makes efficient use of land, whilst taking into account:
- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
 - b) local market conditions and viability;
 - c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
 - d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
 - e) the importance of securing well-designed, attractive and healthy places.
- 9.4. Paragraph 48 of the NPPF details when weight may be given to relevant emerging plans. This guidance states that the stage of preparation, the extent to which there

are unresolved objections and the degree of consistency of relevant policies to the Framework are relevant.

- 9.5. The NPPF sets out at Para 11 a presumption in favour of sustainable development. For decision taking this means:

“(c) approving development proposals that accord with an up-to-date development plan without delay; or

(d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date (8), granting permission unless:

(i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed); or

(ii) any adverse impacts of so doing would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

- 9.6. Footnote (8) referenced here advises “This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a 5 year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 73); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous 3 years.”
- 9.7. The Council’s recent housing delivery has been below Enfield’s increasing housing targets. This has translated into the Council being placed in the “presumption in favour of sustainable development category” by the Government through its Housing Delivery Test.
- 9.8. The Housing Delivery Test (HDT) is an annual measurement of housing delivery introduced by the government through the NPPF. It measures the performance of local authorities by comparing the completion of net additional homes in the previous three years to the housing targets adopted by local authorities for that period.
- 9.9. Local authorities that fail to meet 95% of their housing targets need to prepare a Housing Action Plan to assess the causes of under delivery and identify actions to increase delivery in future years. Local authorities failing to meet 85% of their housing targets are required to add 20% to their five-year supply of deliverable housing sites targets by moving forward that 20% from later stages of the Local Plan period. Local authorities failing to meet 75% of their housing targets in the preceding 3 years are placed in a category of “presumption in favour of sustainable development.
- 9.10. In 2019, Enfield met 77% of the 2,394 homes target for the preceding three-year period (2016/17, 2017/18, 2018/19), delivering 1,839 homes. In 2020 Enfield delivered 56% of the 2,328 homes target. In 2021, Enfield delivered 1777 of the 2650 homes required, a rate of 67%. The consequence of this is that Enfield is within the “presumption in favour of sustainable development” category.

9.11. This is referred to as the “tilted balance” and the NPPF states that for decision-taking this means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole – which also includes the Development Plan. Under the NPPF paragraph 11(d) the most important development plan policies for the application are deemed to be ‘out of date’. However, the fact that a policy is considered out of date does not mean it can be disregarded, but it means that less weight can be applied to it, and applications for new homes should be considered with more weight (tilted) by planning committee. The level of weight given is a matter of planning judgement and the statutory test continues to apply, that the decision should be, as section 38(6) of the Planning and Compulsory Purchase Act 2004 requires, in accordance with the development plan unless material considerations indicate otherwise.

9.12. The London Plan 2021

GG1	Building Strong and Inclusive Communities
GG2	Making the Best Use of Land
GG3	Creating a Healthy City
GG4	Delivering the Homes Londoners Need
GG6	Increasing efficiency and resilience
SD1	Opportunity Areas
D1	London’s form, character and capacity for growth
D2	Infrastructure Requirements for Sustainable Densities
D3	Optimising Site Capacity through the Design-Led Approach
D4	Delivering Good Design
D5	Inclusive Design
D6	Housing Quality and Standards
D7	Accessible Housing
D8	Public Realm
D9	Tall Buildings
D11	Safety, Security and Resilience to Emergency
D12	Fire Safety
D14	Noise
E11	Skills and Opportunities for All
H1	Increasing Housing Supply (*):
H4	Delivering Affordable Housing
H5	Threshold Approach to Applications
H6	Affordable Housing Tenure
H10	Housing Size Mix
S1	Developing London's social infrastructure
S3	Education and childcare facilities
S4	Play and Informal Recreation
HC1	Heritage Conservation and Growth
G1	Green Infrastructure
G4	Open Space
G5	Urban Greening
G6	Biodiversity and Access to Nature
G7	Trees and Woodland
SI1	Improving Air Quality
SI2	Minimising Greenhouse Gas Emissions
SI3	Energy Infrastructure
SI4	Managing Heat Risk
SI5	Water Infrastructure
SI7	Reducing Waste and Supporting the Circular Economy

SI 8	Waste capacity and net waste self-sufficiency
SI12	Flood Risk Management
SI13	Sustainable Drainage
SI17	Protecting and enhancing London's waterways
T1	Strategic Approach to Transport
T2	Healthy Streets
T3	Transport Capacity, Connectivity and Safeguarding
T4	Assessing and Mitigating Transport Impacts
T5	Cycling
T6	Car Parking
T6.1	Residential Parking
T7	Deliveries, Servicing and Construction
T9	Funding Transport Infrastructure through Planning
DF1	Delivery of the Plan and Planning Obligations

9.13. Mayoral Supplementary Guidance

- 9.14. Play and Informal Recreation (September 2012)
Provides guidance to Local Authorities and development to estimate the potential child yield from a development, and the resulting requirements for play space provision.
- 9.15. Sustainable Design and Construction (April 2014)
The Sustainable Design and Construction (SPG) seeks to design and construct new development in ways that contribute to sustainable development.
- 9.16. The Control of Dust and Emissions during Construction and Demolition (July 2014)
The aim of this supplementary planning guidance (SPG) is to reduce emissions of dust, PM10 and PM2.5 from construction and demolition activities in London.
- 9.17. Accessible London: Achieving an Inclusive Environment (October 2014)
The strategy sets out to provide detailed advice and guidance on the policies in the London Plan in relation to achieving an inclusive environment.
- 9.18. Housing (March 2016)
The housing SPG provides revised guidance on how to implement the housing policies in the London Plan.
- 9.19. Affordable Housing and Viability (August 2017)
Set's out the Mayor's policies for assessing and delivering affordable housing and estate renewal.
- 9.20. Better Homes for Local People, The Mayor's Good Practice Guide to Estate Regeneration
Sets out the Mayor's policies for Estate Regeneration.
- 9.21. Local Plan – Core Strategy
- | | |
|----------------|--|
| Core Policy 3 | Affordable Housing |
| Core Policy 4 | Housing quality |
| Core Policy 5 | Housing types |
| Core Policy 9 | Supporting Community Cohesion |
| Core Policy16 | Taking part in economic success and improving skills |
| Core Policy 20 | Sustainable Energy use and energy infrastructure |

Core Policy 21	Delivering sustainable water supply, drainage and sewerage infrastructure
Core Policy 22	Delivering sustainable waste management
Core Policy 24	The road network
Core Policy 25	Pedestrians and cyclists
Core Policy 26	Public Transport
Core Policy 28	Managing flood risk through development
Core Policy 29	Flood Management Infrastructure
Core Policy 30	Maintaining and improving the quality of the built and open environment
Core Policy 31	Built and landscape heritage
Core Policy 32	Pollution
Core Policy 34	Parks, Playing Fields and Other Open Spaces
Core Policy 36	Biodiversity
Core Policy 39	Edmonton

9.22. Local Plan – Development Management Document

DMD1: Affordable Housing on Sites Capable of Housing 10 Units or More
 DMD3: Providing a Mix of Different Sized Homes
 DMD6: Residential Character
 DMD8: General Standards for New Residential Development
 DMD9: Amenity Space
 DMD10: Distancing
 DMD37: Achieving High Quality and Design-Led Development
 DMD38: Design Process
 DMD43: Tall Buildings
 DMD44: Conserving and Enhancing Heritage Assets
 DMD45: Parking Standards and Layout
 DMD47: New Road, Access and Servicing
 DMD48: Transport Assessments
 DMD49: Sustainable Design and Construction Statements
 DMD50: Environmental Assessments Method
 DMD51: Energy Efficiency Standards
 DMD52: Decentralized energy networks
 DMD53: Low and Zero Carbon Technology
 DMD55: Use of Roofspace/ Vertical Surfaces
 DMD56: Heating and Cooling
 DMD57: Responsible Sourcing of Materials, Waste Minimisation and Green Procurement
 DMD58: Water Efficiency
 DMD59: Avoiding and Reducing Flood Risk
 DND60: Assessing Flood Risk
 DMD61: Managing surface water
 DMD62: Flood Control and Mitigation Measures
 DMD64: Pollution Control and Assessment
 DMD65: Air Quality
 DMD68: Noise
 DMD69: Light Pollution
 DMD70: Water Quality
 DMD71: Protection and Enhancement of Open Space
 DMD72: Open Space Provision
 DMD73: Child Play Space
 DMD78: Nature conservation
 DMD79: Ecological Enhancements

DMD80: Trees on development sites
DMD81: Landscaping

9.23. Edmonton Leaside Area Action Plan

EL1: Housing in Meridian Water
EL2: Economy and Employment in Meridian Water
EL3: Meridian Water Town Centre
EL5: Community Facilities in Meridian Water
EL6: The Central Spine and Central Spine Corridor
EL7: Rail and Bus Improvements
EL8: Managing Flood Risk in Meridian Water
EL9: Leisure Facilities and Open Space at Meridian Water
EL10: Urban Grain at Meridian Water
EL11: Building Form at Meridian Water
EL12: Public Realm at Meridian Water
EL13: Infrastructure Delivery in Meridian Water
EL21: Improving the Quality of the Pedestrian and Cycling Environment
EL22: Proposed Pedestrian and Cycle Route - Improvement Principles
EL23: Enhancing the Bus Network and Services
EL25: Design of the Road Network
EL27: Watercourses at Edmonton Leaside
EL28: New and Existing Green Spaces

9.24. Other Material Considerations

Enfield Climate Action Plan (2020)
Enfield Housing and Growth Strategy (2020)
Enfield Intermediate Housing Policy (2020)
Enfield Biodiversity Action Plan
Enfield Characterisation Study (2011)
Enfield Local Heritage List (May 2018)
Enfield S106 SPD (2016)
Enfield Decentralised Energy Network Technical Specification SPD (2015)
Making Enfield: Enfield Heritage Strategy 2019-2024 SPD (2019)
The Setting of Heritage Assets – Historic Environment Good Practice Advice in Planning: 3, Historic England (2017)
London Councils: Air Quality and Planning Guidance (2007)
TfL London Cycle Design Standards (2014)
GLA: Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)
GLA: Shaping Neighbourhoods: Character and Context SPG (2014)
GLA: The Control of Dust and Emissions during Construction and Demolition SPG (2014)
GLA: London Sustainable Design and Construction SPG (2014)
GLA: Accessible London: Achieving an Inclusive Environment SPG (2014)
GLA: Social Infrastructure SPG (2015)
GLA: Housing SPG (2016)
GLA: Homes for Londoners: Affordable Housing and Viability SPG (2017)
Mayor's Transport Strategy (2018)
GLA Threshold Approach to Affordable Housing on Public Land (2018)
Healthy Streets for London (2017)
Manual for Streets 1 & 2, Inclusive Mobility (2005)
National Planning Practice Guidance
National Design Guide (2019)

9.25. Enfield Draft New Local Plan and Draft Proposals Map

9.26. The Council consulted on Enfield Towards a New Local Plan 2036 “Issues and Options” (Regulation 18) (December 2018) in 2018/19. This document represented a direction of travel and the draft policies within it will be shaped through feedback from key stakeholders. As such, it has relatively little weight in the decision-making process. Nevertheless, it is worth noting the emerging policy H2 (Affordable housing) which sets out a strategic target that 50% additional housing delivered across the borough throughout the life of the plan will be affordable; policy H4 (Housing mix) which identifies the borough’s needs for homes of different sizes and tenures; and H5 (Private rented sector and build-to-rent) which sets out that the Council will seek to maximise the supply of housing in the borough by, amongst other things, supporting proposals for standalone build to rent developments.

9.27. As the emerging Local Plan progresses through the plan-making process, the draft policies within it will gain increasing weight, but at this stage it has relatively little weight in the decision-making process.

9.28. Key local emerging policies from the plan are listed below:

- Policy DM SE2 – Sustainable design and construction
- Policy DM SE4 – Reducing energy demand
- Policy DM SE5 – Greenhouse gas emissions and low carbon energy supply
- Policy DM SE7 – Climate change adaptation and managing heat risk
- Policy DM SE8 – Managing flood risk
- Policy DM SE10 – Sustainable drainage systems
- Strategic Policy SPBG3 – Biodiversity net gain, rewilding and offsetting
- Policy DM BG8 – Urban greening and biophilic principles
- Policy DM DE1 – Delivering a well-designed, high-quality and resilient environment
- Policy DM DE2 – Design process and design review panel
- Policy DM DE6 – Tall buildings
- Policy DM DE7 – Creating liveable, inclusive and quality public realm
- Policy DM DE10 Conserving and enhancing heritage assets
- Policy DM DE11 – Landscape design
- Policy DM DE13 – Housing standards and design
- Policy DM H2 – Affordable housing
- Policy DM H3 – Housing mix and type
- Policy DM T2 – Making active travel the natural choice
- Strategic Policy SP D1 – Securing contributions to mitigate the impact of development

ANALYSIS

10. Main Planning Issues

10.1. The main planning issues raised by the Proposed Development are:

- Principle of Development
- Housing Need and Delivery
- Commercial, Community and Leisure Uses
- Design
- Residential Quality and Amenity
- Open Space, Play Space, Landscaping and Trees
- Biodiversity and Ecology
- Transport, Access and Parking
- Sustainability and Climate Change
- Environmental Health
- Flood Risk and Drainage
- Socio-economics and Health
- Community Infrastructure Levy and S106

11. Principle of Development

- 11.1. Enfield's Authority Monitoring Report 2020/2021 shows that during the preceding 10 years, the Borough had delivered a total of 5,616 homes which equates to approximately 562 homes per annum. Enfield's 2020 Housing Delivery Action Plan recognises that the construction of more affordable high-quality homes is a clear priority, with only 60% of approvals being implemented. A Local Housing Need Assessment (LHNA) was undertaken in 2020 and identifies an annual housing need of 1,744 homes across the Borough based on a cap of 40% above the London Plan annual target of 1,246 homes, in line with the Government's standard methodology.
- 11.2. The Council's Draft Enfield Local Plan (Regulation 18) (2021) acknowledges the sheer scale of the growth challenge for the Council and the Council's Housing and Growth Strategy 2020-2030 aims to deliver the London Plan targets for the borough.
- 11.3. Enfield is a celebrated green borough with close to 40% of the land currently designated as Green Belt or Metropolitan Open Land and a further 400 hectares providing critical industrial land that serves the capital and wider south-east growth corridors. These land designations underpin the need to optimise development on brownfield land. London Plan Policy H1 highlights the urgency to optimise housing provision on brownfield sites, specifically identifying opportunity for housing intensification and development on publicly owned sites. The Application Site constitutes previously developed land and therefore the principle of developing the site for housing to support the Borough's housing delivery target is supported.
- 11.4. The principle of bringing Meridian Water Phase 1b forward as a residential-led development has been established in adopted policy and in the approved outline planning application for Phase 1 (16/01197/RE3).
- 11.5. Enfield's Core Strategy identifies Central Leaside and Meridian Water as a strategic growth area and Place Shaping Priority Area supported by Core Policy 38 to create a new community of family homes and employment opportunities.

- 80% of the area should comprise a mix of residential, retail, community uses and open spaces, with high quality public realm and higher densities nearest Meridian Water station.
- 11.6. The 2013 Meridian Water Masterplan SPD sets out eight principles for the area's growth, including seizing on the scale of the site to introduce transformative change, delivering new homes of a mix of tenures and types, generating economic benefits, improving physical connections, celebrating the area's water assets, reinforcing communities, and promoting health and sustainability. The area of Phase 1 – identified as the Meridian Angel neighbourhood – is seen as an extension of residential uses to the west, with a density of approximately 1,000 homes supported by transport connections, as well as community facilities and open spaces.
 - 11.7. The 2020 Edmonton Leaside Area Action Plan identifies Meridian Water as an opportunity area and the borough's "largest residential-led mixed use development..." Policy EL1 supports maximising the number of homes delivered, provided supporting infrastructure and services are provided alongside, and the overall quantum is a product of good design and incorporates a balanced mix of housing types.
 - 11.8. Outline planning permission for Phase 1 (16/01197/RE3), of which the Application Site is a part, was approved to provide 725 residential units, a new station building, retail space, community facility floorspace and leisure space, as well as public realm and open space improvements. With the government grant securing infrastructure at Meridian Water and the opening of the Meridian Water West Anglia Main Line rail station adjacent to the Application Site, the capacity for Phase 1b to deliver additional housing has been re-evaluated. The proposal to extend the provision of housing in Phase 1 is supported by the Meridian Water Masterplan and the Edmonton Leaside Area Action Plan, which seeks to locate density nearest public transport.
 - 11.9. The proposal accords with London Plan Policy GG2, which advocates making the best use of brownfield land, maximising publicly-owned sites and finding opportunities for sustainable intensification. Although Meridian Water, as a wider strategic site, is early in its construction, its growth is supported by an AAP and infrastructure strategy formulated to sustain commensurate densities. In reassessing the quantum of housing approved for Phase 1b as part of the Phase 1 outline application, the proposal seeks to make more efficient use of land by extending the provision of housing and significantly lifting the proportion and amount of affordable housing. Given this site has been previously developed and remediated, and forms part of a masterplan for Meridian Water to provide needed homes and jobs, the principle of a residential-led development with densities increased from the Phase 1 outline application is justified.
 - 11.10. The Core Strategy (Core Policy 3) and DMD (Policy DMD1) seek a borough-wide target of 40% affordable housing in new developments, applicable on sites capable of accommodating ten or more dwellings.
 - 11.11. London Plan Policy H4 outlines the strategic target of 50% of all new homes delivered across London to be genuinely affordable and outlines specific measures to aid achieving this aim. Policy H2 of the New Enfield Local Plan, whilst holding limited weight, mirrors the New London Plan in outlining that the Council will seek the maximum deliverable amount of affordable housing on

development sites and that the Council will set a strategic target of 50% of new housing to be affordable.

- 11.12. The application proposes to increase the amount of housing delivered on Phase 1b over the quantum approved in the Phase 1 outline application. This increase serves both the delivery of more, much-needed housing in Enfield, and enables a higher proportion of affordable housing on Phase 1 than approved in the outline application – the proportion is increased from the approved 25% to 50% proposed as part of this application. This application offers 676 homes on the Application Site; this is in addition to the 301 units being constructed on Phase 1a. Together, with the present proposal for Phase 1b, Phase 1 will deliver 977 homes. Of these, 491 homes will be affordable, representing 50.2% of all housing units on Phase 1. This proportion of affordable housing meets the London Plan target and the emerging Local Plan. As part of the affordable housing offer, 242 (49%) homes are proposed to be London Affordable Rent and 249 (51%) are proposed as shared ownership. The proposed development therefore supports LBE's ambition to build a range of affordable homes to support Enfield residents currently in need as well as those seeking access to the property market. The principle of affordable housing provision is supported.

Principle of development conclusions

- 11.13. The development has no land-use implications. It proposes an intensification of delivery of homes that is rigorously supported by policy as well as an extant outline permission. The proposal exceeds LBE's adopted affordable housing target of 40% and meets the London Plan's target of 50%. The mix and quantities of uses accord with the Phase 1 outline permission and contribute to Meridian Water as a vibrant, sustainable community. Accordingly, the principle of an increase in housing development on the Application Site is supported.

12. Housing Need and Delivery

Housing Need

- 12.1. The NPPF (Para. 125) is clear that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. In these circumstances: .c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in the NPPF. The London Plan sets a target for the provision of 66,000 new homes across London each year. Whilst Enfield's 2020 Housing Delivery Action Plan recognises that the construction of more affordable high-quality homes is a clear priority, only 60% of approvals in the Borough are being delivered.
- 12.2. The London Plan 2021 identifies a need for a minimum of 1,246 dwellings per year to be delivered over the next 10 years in the Borough, an increase over the previous target of 798.
- 12.3. Enfield's Housing and Growth Strategy 2020-2030 sets five ambitions, the first of which is 'More genuinely affordable homes for local people'. The ambition sets a priority to maximise housing delivery and use council assets to achieve this. The key aims of the Strategy seek to address the housing crisis within the Borough. During consideration of the Cabinet report, Members discussed the current

housing situation and highlighted the rise in private sector rents in proportion to the average salary and the significant rise in homelessness. Enfield had one of the highest numbers of homeless households in the country. Insecurity and unaffordability of private sector housing has evidence-based links with homelessness. One of the most common reason for homelessness in London is currently due to the ending of an assured tenancy (often by buy to let landlords). MHCLG (2018) data shows a significant increase in the number of households in Enfield using temporary accommodation – with a significant 67% increase between 2012 and 2018.

- 12.4. The 2016 London Housing SPG outlines a vision that delivers high quality homes and inclusive neighbourhoods by ensuring that appropriate development is prioritised.
- 12.5. Taking into account the housing needs of Enfield's population, nationally- and regionally-set housing delivery targets and shortfalls in meeting targets, it is evident that this proposal to make more effective use of Council land to provide a greater number of homes, at a high-quality and with a range of housing types is wholly supported by policy.

Affordable Housing

- 12.6. The NPPF must be taken into account in the preparation of local plans and is a material consideration in planning decisions. Annex 2 of the Revised NPPF (2021) defines Affordable Housing as “housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)”.
- 12.7. London Plan Policies H4 and H5 outlines a strategic target for 50% of all new homes delivered across London to be affordable with threshold level of affordable housing on gross residential development at 50% on public sector land where there is no portfolio agreement with the Mayor.
- 12.8. Core Policy 3 of the Core Strategy sets a borough-wide affordable housing target of 40% in new developments, applicable on sites capable of accommodating ten or more dwellings. Affordable housing should be delivered on-site unless in exceptional circumstances. In reflection of London Plan targets and the evidence demonstrating the crucial need for affordable housing, emerging Local Plan Policy H2 aims to secure 50% of all new homes in Enfield as affordable.
- 12.9. According to the Enfield Local Housing Needs Assessment 2020, only households with acute housing need are on the Council's housing register, that is, eligible to be given Council housing. The vast majority of those on the register, or waiting list, live in temporary accommodation. Households who are not homeless or living in temporary accommodation rely on housing through the private sector and are typically supported by housing benefit. As of 2020, there were 12,300 households supported by housing benefit in the private rented sector within Enfield. The Assessment concluded that there is an annual net shortfall of 711 affordable rented homes. As the Assessment notes, this shortfall underrepresents the numbers of residents who are not in acute housing need but would still qualify for housing benefit to afford accommodation.
- 12.10. Outline planning permission for Phase 1 (16/01197/RE3) was approved to provide 725 residential units with 25% of these units being affordable. Application 20/03821/RM granted 300 units on Phase 1a to be delivered under reserved

matters. Of the 300 units on Phase 1a, 272 were approved to be affordable. This constitutes a proportion of affordable housing on Phase 1a of 91%. With 300 units approved on Phase 1a under reserved matters, 425 homes remain to be developed on Phase 1b, based on the 725-home total approved in the Phase 1 outline permission. If Phase 1b was brought forward as a reserved matters application, none of the 425 homes would be required to be affordable as the matter of affordability had been secured in the outline application – requiring 25% across all of Phase 1 and already delivered on Phase 1a.

- 12.11. As noted, there is a concurrent application for one additional affordable home on Phase 1a. (22/00106/FUL) This application is for determination on this agenda.
- 12.12. The present application proposes 676 homes on the Application Site, Phase 1b. Of the total 676 residential units, 458 (68%) are proposed to be market rate and 218 (32%) are proposed to be affordable and delivered on-site. This comprises 95 shared ownership homes and 123 London Affordable Rent homes.
- 12.13. As Phase 1 is a single phase in Meridian Water's development, the provision of affordable housing is assessed for Phases 1a and 1b together. Across all of Phase 1, with the present application proposal for Phase 1b, there would be a total of 977 homes. Of these, 486 (49.7%) are proposed to be market rate and 491 (50.3%) are proposed to be affordable and delivered on-site. The affordable units comprise 249 shared ownership homes and 242 London Affordable Rent homes.
- 12.14. The London Plan requires that the percentage of affordable housing on a scheme is calculated in habitable rooms to ensure that a range of unit sizes is provided. The proportion of affordable housing for all of Phase 1, including the present Application Site proposal, in habitable rooms equates to 59.4%. The delivery of 50.3% affordable homes measured in units or 59.4% affordable homes measured in habitable rooms accords with existing and emerging policy and makes the best use of Council land to extend affordable housing provision in Enfield.

Housing Tenures

- 12.15. London Plan Policy H6 sets out the split of affordable tenures that should be applied in residential development:
 - a minimum of 30 per cent low-cost rented homes, as either London Affordable Rent or Social Rent, allocated according to need and for Londoners on low incomes
 - a minimum of 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership
 - the remaining 40 per cent to be determined by the borough as low-cost rented homes or intermediate products (defined in Part A1 and Part A2) based on identified need.
- 12.16. Enfield Core Policy 3 and DMD Policy 1 stipulate a borough-wide affordable housing ratio of 70% social rented and 30% intermediate provision.
- 12.17. Although of lesser policy weight, the emerging Local Plan Draft Strategic Policy SP H2 stipulates that affordable housing should be provided with a tenure mix of 50% social rented housing and 50% intermediate housing.

12.18. The development proposes the following affordable tenure split:

Phase	London Affordable Rent	Shared Ownership
1a	119 homes (44%)	154 homes (56%)
1b	123 homes (56%)	95 homes (44%)
Total	242 (49%)	249 (51%)

12.19. The application proposal meets tenure requirements as set out in the London Plan and supported by the most recent borough evidence. The affordable housing offer, in terms of tenure split, is acceptable.

Dwelling Mix

12.20. London Plan Policy H10 states that schemes should generally consist of a range of unit sizes and that this should have regard to a number of criteria including robust local evidence, the mix of uses in the scheme, the range of tenures in the scheme, the nature and location of the site, amongst other considerations.

12.21. Core Policy 5 of the Core Strategy seeks to provide the following borough-wide mix of housing:

- Market housing – 20% 1 and 2 bed flats (1-3 persons), 15% 2 bed houses (4 persons), 45% 3 bed houses, (5-6 persons), 20% 4+ bed houses (6+ persons).
- Social rented housing - 20% 1 bed and 2 bed units (1-3 persons), 20% 2 bed units (4 persons) 30% 3 bed units (5-6 persons), 30% 4+ bed units (6+ persons).
- The mix of intermediate housing sizes will be determined on a site by site basis and the appropriate mix must take into account a range of factors, including development viability and the affordability of potential users.

12.22. The evidence base to support the unit mix set out in Core Policy 5 dates from 2008. More recently, the Local Housing Needs Assessment 2020 was prepared to support the emerging Local Plan and is the most up-to-date source of evidence. Reflecting London Plan Policy H10 A1, Draft Local Plan Policy H3 (while it is not adopted policy), outlines priority types for different sized units across different tenures:

	Studio/bedsit	One-bedroom	Two-bedrooms	Three-bedrooms	Four-bedrooms or more
Social/affordable rented	Low priority	Medium priority	High priority	High priority	Low priority
Intermediate	Low priority	High priority	High priority	Medium priority	Low priority
Market	Low priority	Low priority	Medium priority	High priority	High priority

12.23. The Council's Local Housing Needs Assessment 2020 outlines that 41.1% of new affordable homes should have three bedrooms. This is based on housing register evidence. It also outlines that the focus of affordable ownership provision (shared equity/intermediate products) should be on one and two-bedroom units, as the majority of households who live in intermediate (shared ownership) housing are households without children.

12.24. The applicant proposes the following dwelling mix across the entire housing offer:

Dwelling mix for Phase 1b

	Studios		1 bedroom		2 bedroom		3 bedroom		4 bedroom	
Market	23	5%	262	57%	169	37%	4	1%	0	0
Shared ownership	0	0%	51	54%	36	38%	8	8%	0	0
London Affordable Rent	0	0%	0	0%	55	45%	67	54%	1	1%
Total	23	3%	313	46%	260	38%	79	12%	1	<1%

Dwelling mix for all of Phase 1

	Studios		1 bedroom		2 bedroom		3 bedroom		4 bedroom	
Market	27	6%	266	55%	189	39%	4	1%	0	0
Shared ownership	0	0%	85	34%	125	50%	33	13%	6	2%
London Affordable Rent	0	0%	45	19%	76	31%	95	39%	26	11%
Total	27	3%	396	40%	390	40%	132	14%	32	3%

12.25. Taken as a whole, the proposed dwelling size mixes for both Phase 1 and Phase 1b (as in this application) deviate from the adopted policy (Core Policy 5) and the borough-wide evidence of need, providing a larger proportion of one-bedroom units and fewer 3- and 4-bedroom than the evidence indicates needs to be provided.

12.26. Looking at the individual tenures, the market housing disproportionately proposes studios, 1-bed and 2-bed homes, and underprovides family-sized 3- and 4-bedroom homes in order to comply with policy and evidenced need.

12.27. The application concentrates provision of family-sized homes in the London Affordable Rent component, with the Phase 1b proposal comprising 54% 3-bedroom homes. Across all of Phase 1, including the Phase 1b proposal in this application, the proportion of 3- and 4-bedroom London Affordable Rent homes is 39% and 11% respectively; half of London Affordable Rent homes are family-sized.

12.28. The intermediate shared ownership tenure includes 54% 1-bedroom and 38% 2-bedroom homes. London Plan policy directs the Council to consider the dwelling size mix of intermediate tenures based on market evidence. In this regard, the proposal is appropriate and the balance of unit sizes in the intermediate tenure is accepted.

12.29. The London Plan makes allowance for site- and location-specific considerations to allow flexibility in applying housing mix standards, as well as enabling a design-led approach to be taken in the optimisation of a site's capacity.

- 12.30. The Government prescribes a “tilted balance” in favour of housing delivery to the Council’s planning decision-making as a result of Enfield’s shortfall in meeting housing delivery targets. This means that applications for new homes should be given greater weight, and Councils should grant permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits of the housing proposal. In 2021, Enfield delivered 67% of its Housing Delivery Test target for the preceding three-year period. Development on Council land presents a significant opportunity to provide needed housing. Although not in line with recently demonstrated need, the proposed dwelling mix with a disproportionate provision of one- and two-bedroom homes in the market-rate tenure means that more homes are provided overall. Crucially, the delivery of family sized homes that are proposed in this application has been focused in the London Affordable Rent tenure to offer homes to families with the greatest need. It should be noted again that the 2017 Phase 1 outline permission secured 725 homes and a proportion of affordable housing of 25%. The increase in number of homes proposed as part of this application enables a proportion of affordable housing units of 50% and habitable rooms of 59.4%.
- 12.31. The general site arrangement and development plots were approved as part of the Phase 1 outline application. The plots have been located to create legible circulation, a proportionate street grain, efficient building footprints with enough space remaining for meaningful open spaces, good quality public realm and frontages that appropriately engage with their settings. In a development of this density, family-sized units must be located to provide adequate amenity for all of the residents of the home, with convenient entrances, access to outdoor space and flexibility to adapt as families grow. 3- and 4-bedroom homes have been located on lower floors, with entrances in quieter locations and more convenient access to outdoor amenity. The inclusion of more family-sized units would mean a compromise to the amenity of these units as well as a loss of smaller homes and proportion of affordable housing overall.
- 12.32. Given the evidenced need for new housing, the high proportion of family-sized units proposed within the London Affordable Rent offer, it is considered that the collective benefits of the proposal outweigh the divergence of the dwelling size mix from policy.

13. Commercial, Community and Leisure Uses

Commercial proposal

- 13.1. The application proposes 2,581 sqm of non-residential floorspace, which includes 1,209 sqm flexible commercial floorspace (Use Class E a, b, c, g) located on the ground floor of Plot B, fronting Station Square and on Plot D facing Park Street and Station Square. Use class E a, b, c and g allow for retail shops, food and drink premises, financial and professional services, offices, R&D functions and residential-compatible industrial uses.
- 13.2. The applicant submitted a Commercial Strategy (November 2021) to inform the types of uses envisioned for the commercial spaces. The Commercial Strategy is not an approved document and is referred to for information only.
- 13.3. The use class E set of uses allow a flexible range of potential occupants of the commercial spaces. Based on the submitted Commercial Strategy, the applicant proposes a range of adaptable spaces that can be left as individual sites or connected to provide larger premises to function as studios, ‘maker’ spaces, light-

scale production or co-working spaces. Enfield Core Policy 17 identifies a Local Centre that will serve the locality. (The emerging Local Plan identifies Meridian Water as a Large Local Centre.) Local Centres provide core shopping and services. Enfield DMD Policy 25 reinforces the criteria for new shopping centres, including uses that support vitality and viability, the design of shopfronts is well integrated into the built environment and that the proposed uses do not cause harm to residents or residential amenity.

- 13.4. As Meridian Water includes a designated local centre, use classes E (a), (b) and (c) are appropriate for providing local shopping, food venues and essential neighbourhood services.
- 13.5. The definition of use class E (g) (iii) provided by the Town and Country Planning (Use Classes) Order 1987 as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 is 'any industrial process, being a use, which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.' (Schedule 2, Part A). Enfield policy DMD 23 part 2 states that development of industrial uses outside of designated industrial areas 'will only be permitted if the following criteria are met:
- The use should be compatible with the existing uses in the surrounding area and there should be no adverse impact on the surrounding areas;
 - There should be no adverse impact on the capacity of the local road network;
 - The development should provide adequate on-site parking and servicing for its intended use, including space for waiting goods vehicles.'
- 13.6. Based on the scale of commercial spaces proposed and the fact that the proposal seeks to flexibly tenant the spaces among use classes E (a), (b), (c) and (g), the anticipated amount of use class E (g) uses should be able to comply with policy DMD 23 and not cause any disruption to residential amenity, local road operations or create undue servicing issues.
- 13.7. In order to ensure a cohesive and visually-appealing ground floor presence, it is recommended that there is a condition requiring details of shopfronts and signage zones. They should be designed as a set of unified design elements to help ensure an engaging ground floor frontage and visual consistency, even as occupants may change. Officers support this approach.

Community space proposal

- 13.8. The Meridian Water Phase 1 outline approval includes a maximum of 600 sqm of community floorspace. The present application for Phase 1b proposes a single community facility on the ground floor of Plot B to be used as a medical facility and approved as use class E (e). The space is proposed to be delivered as a shell and core but has been informed through extensive consultation with the Clinical Commissioning Group to ensure it can be laid out as a functional surgery and is able to accommodate the needed number of GPs. It is intended that the medical space will be leased as an NHS surgery.
- 13.9. In consideration of the proposal, the NHS Healthy Urban Development Unit (or HUDU) advised that, based on the scale of proposed development, the healthcare requirement that should be secured via S106 is £940,000. This sum does not account for the provision of a medical space. Officers have been provided a

market valuation of the medical space conducted by an independent firm. The assessment indicates that the facility is valued in excess of £940,000. In this respect, the provision by the applicant of the medical space satisfies the requirement for the healthcare contribution calculated by HUDU. The S106 will secure this medical space for use by an NHS practice in order to appropriately mitigate the healthcare impact. The proposal for a medical space is considered appropriate and necessary to mitigate the identified healthcare impact.

Leisure space proposal

- 13.10. In addition to retail and community space, the Phase 1 outline permission includes up to 750 sqm of leisure floorspace. The application proposes a 809-sqm leisure facility on the ground floor of Plot C, fronting Park Street. Use class E (d) allows for indoor sports recreation other than swimming pools, ice rinks, or motorised vehicles or firearms). The submitted Commercial Strategy (November 2021) suggests uses may be bouldering, yoga, a gym or specialist fitness.
- 13.11. As part of the consultation process, the application was referred to Sport England for consideration. Sport England requested that the applicant provides an assessment of sporting provision in the area and demonstrate how the proposal is helping to meet sporting demand, either existing or introduced by the subject development.
- 13.12. London Plan Policy S5, Enfield Core Strategy Core Policy 11 and the emerging Enfield Local Plan policies SP PL5 and SP CL4 set out the strategic responsibility of the Council to ensure adequate provision of leisure and recreational facilities based on assessment of need. In response to the request by Sport England to demonstrate local provision, the applicant prepared a summary of local facilities and reaffirmed the inclusion of a leisure space on the ground floor of Plot C as part of the present proposal. Officers accept that the application provides a leisure space that will contribute to sports provision. The existing S106 agreements stemming from the Phase 1 outline permission secures a contribution towards open space improvements that could support new and/or enhanced leisure facilities. Although subject to further viability evaluation, any additional open space contributions commensurate with the uplift in residential units will be secured via a new S106 agreement. On the whole, the level of sporting provision proposed by this application is acceptable.

14. Design

High-quality design and layout

- 14.1. Paragraph 126 of the NPPF underscores the central value of good design to sustainable development. The Framework expects the planning process to facilitate “high quality, beautiful and sustainable buildings and places”. As in Paragraph 130, the assessment of a scheme should take into account the endurance of the design, visual appeal, sensitivity to local context, sense of place, optimisation of the site and contribution to health and wellbeing.
- 14.2. London Plan Policy D4 encourages the use of master plans and design codes to ensure the delivery of high-quality design and place-making. Design scrutiny, through the use of Design Review Panels is encouraged.

- 14.3. Enfield Policy DMD 37 sets out objectives for achieving good urban design: character; continuity and enclosure; quality of public realm; ease of movement; legibility; adaptability and durability; and diversity.
- 14.4. Being the first phase of the wider Meridian Water development, it is expected that Phase 1 (of which the Application Site is a part) sets a precedent for high quality buildings and spaces. There is an opportunity for the character of the development to draw on the industrial heritage of the area, including the demolished gas holders, to influence the development's identity and a sense of place.
- 14.5. The general site layout was approved as part of the Phase 1 outline permission; the proposed layout conforms to that approval. The internal layout achieves a good level of active frontage to the surrounding public realm, with commercial uses and residential lobbies/doors providing surveillance to the public realm. The arrangement provides a clear division of public and private space.
- 14.6. Aspects of the design proposal are further assessed below. A site plan with building names is provided for ease of reference. Phase 1b proposal is in the red line.



14.7. Plot C has a number of larger, family-sized homes that are partially sited at ground floor. These are appropriately located with frontages on Southern Park and opposite townhouses coming forward on Phase 1a. The applicant has used best practice to ensure that these units are maisonettes with dual aspect homes while wrapping the podium with active frontage. With some exception, private amenity areas are located above ground floor, so that these spaces are more private, more likely to be used and less likely to be screened.

14.8. The layouts of the plots are generally well resolved.

Density

14.9. The 2021 London Plan has amended the policy approach to assessing density. Whereas previous policy set out ranges of appropriate density based on location

and site access, the current Policy D3 emphasises the importance of a design-led approach to optimise site capacity, including site allocations. This removes the standardisation of density calculations with a more site-specific evaluation.

- 14.10. Adopted Core Policy 5 states that density should balance the need to make the most efficient use of land, account for accessibility to transport and respect existing character. DMD Policy 6 is also guided by the London Plan density matrix (which has now been superseded by current London Plan Policy D3, as above), wanting to ensure scale and form are appropriate, the development is of a high quality and regard is given to housing mix targets.
- 14.11. The Phase 1 outline application secures 725 homes on the whole of Phase 1. The Phase 1a reserved matters application was approved for 300 units on that part of the site. There remain 425 units to implement on the remainder of the site under the outline permission. On Phase 1 as a whole, 725 units is a density of 101 units/hectare. With the present application and increase in units to 976 across Phase 1, the proposed density is increased to 136 units/hectare. In light of the Application Site's immediate adjacency to the Meridian Water station, the increasing levels of investment in transport infrastructure at Meridian Water and the increased level of affordable housing (from 25% to 50%) that comes with the proposed uplift in residential units, this resulting density is appropriate for this location.

Massing and height

- 14.12. London Plan Policy D9 outlines that Development Plans should define what is considered a tall building for specific localities, the height of which will vary but should not be less than 6 storeys (or 18 metres).
- 14.13. Policy DMD 43 of the Enfield Development Management Plan Document states that tall buildings will not be acceptable in areas classified as inappropriate. The policy defines inappropriate areas as those within or adjacent to the Green Belt or within proximity of conservation areas, nationally or locally listed buildings, scheduled or locally listed ancient monuments, or nationally or locally registered historic parks and gardens. The Application Site does not come under any of these definitions. Policy DE6 of the emerging Enfield Local Plan outlines that the principle of tall buildings will be supported in appropriate locations and that different definitions of "tall buildings" are used throughout the Borough to reflect local context. Figure 7.4 within Policy DE6 identifies areas where tall buildings could be acceptable (subject to compliance with outlined criteria). Although not adopted as policy and having limited weight, the Application Site is identified within Figure 7.4, further indicating that the Application Site is appropriate for tall buildings.
- 14.14. The application proposes a tower of 24 storeys on Plot B and a tower of 30 storeys on Plot D, nearest the station. While at the upper end of what would be supported, optimising height here is considered appropriate. The building marks a key rail station with convenient access to the Victoria Line for new residents and the established Edmonton area. It also sits at the access point to a new neighbourhood with cycle ways, pedestrian routes, a new high street and a series of parks and squares, ultimately providing access via new bridges over three waterways into the Lee Valley Regional Park.
- 14.15. The 30-storey building is located to the southeast of Station Square. While some overshadowing will occur, this position means that the square will benefit from

increasing sunlight from lunch time onwards – a time of day when the square will be enjoyed by restaurant visitors and shop visitors. The octagonal form of this building helps to create an interesting, distinctive and elegant structure.

- 14.16. The 24-storey building is positioned to the north of the square, thereby avoiding overshadowing it. For townscape and legibility reasons, this position is favoured because it gives breathing space to the main tower and helps mark both the location of the station and square when approached from the north and south along Park Street. The simpler form of this building helps to visually defer to the main tower building, while maintaining a high quality and graceful silhouette.
- 14.17. In consideration of London Plan Policy D9, the applicant has demonstrated that there are no adverse impacts to views. The locations and prominence of the 30- and 24-storey towers appropriately mark Meridian Water and the station in the townscape. As discussed below, the proposed architectural quality and materials are strong, and the buildings are not adjacent to or within the setting of heritage assets, a World Heritage Site or the River Thames. The proposal satisfactorily addresses all other areas of impact cited in Policy D9.
- 14.18. The remainder of the blocks are of a significant urban scale, appropriate to the ambitions and character of the wider regeneration area. The massing steps down to the west to meet the lower rise development in Phase 1a.
- 14.19. The perimeter blocks have a strong base/plinth with breaks in the massing at upper floors to allow light into and views out of the courtyards.
- 14.20. While officers find that, overall, the buildings are successful, some of the nuances of the massing might have been further improved, for example:
- The western elevation of Plot D has an unbroken run of 9 storeys with a strong horizontal emphasis. There were mixed views on this approach, with some officers supporting the horizontal emphasis, while others felt this could have been relieved with a line of setbacks.
 - The northeast corner of Plot C could have also benefitted from additional expression, as it sits in direct view of the top of the station steps. With a more recognisable element, it may have offered visual interest and wayfinding point.
- 14.21. However, the application architects are confident in their design approach and given the subjective nature of these points, these are not presented as objections and the massing and height overall is supported.

Architecture and materials

- 14.22. The proposed architectural detailing is generally of high quality throughout. The extensive use of brick is supported and indicated fenestration, reveals and other details appear well resolved and of high quality. A condition requiring drawings of typical architectural details and another with detailed materials specification are recommended. In addition, in accordance with London Plan policy architectural quality should be secured through architect retention clauses with the S106 Agreement.
- 14.23. The chevron column design on Plot B is strongly supported. The remainder of the tower is well proportioned and detailed when viewed in isolation.

- 14.24. Officers agree that the Plot D tower, as it is the tallest on the site, should be special and visually distinct from the remainder of the development. Ideally, Plot D should reflect some commonality with other buildings on the site, as part of a 'family' of structures, however, the design team advised that amending materiality would increase the depth of secondary elements and reduce the reveal between terracotta bands, which would not be desirable. On balance, and due to the quality of the architecture proposed, the design and materiality of this block is supported.
- 14.25. Officers were very careful to consider the proposal for the Plot D building crown. As the tallest building in Enfield, this would be a feature of significance and the design should be commensurate with its prominence. In many ways, it is a landmark to Meridian Water and Enfield. The London Plan states (Policy D.9.C.1.c) that in the design of a tall building, the "architectural quality and materials should be of an exemplary standard" and that "the top should be designed to make a positive contribution to the quality and character of the skyline". Officers have promoted a crown design that is special, celebratory and memorable. There is concern that the crown treatment is relatively subtle and visually recessive, and that the colour and materiality are likely to be visually lost. Therefore, a condition is recommended reserving additional detail of this feature, including materiality and lighting to allow further development of the crown character, creating a structure that confidently meets the sky and presents an interesting visual termination to the building.
- 14.26. In general, officers would have liked to have seen the scheme integrate more references to the industrial heritage of the site through the use of industrial materials, window proportions and roof forms. Some elements that have been incorporated are Plot D ground- and mezzanine-level treatment references to industrial rooflines, and lighting columns in the Southern Park and station square that echo gas holders. Officers would welcome references to the area's industrial history in the details of furniture and fixtures required as part of the landscaping details condition.
- 14.27. To ensure buildings are constructed in accordance with the details set out in the planning submission, the applicant has included plans, sections, elevations and detail drawings to ensure these elements are captured in the planning decision. A condition is included to comply with the approved drawings.
- 14.28. The success of the ground plane environment relies, in some part, on the vibrancy and activation of commercial and ground floor spaces. While there are several commercial units proposed, particularly fronting Station Square, there are several street-facing supporting uses such as residential lobbies, the recreation space (or gym) in Plot C and medical space in Plot B. To establish and maintain a good relationship with the public realm, a shopfront design code and subsequent details of shopfronts and signage are recommended to be conditioned.
- 14.29. The design and specification of all podium vehicular access shuttering/doors/gates should be the subject of a condition. Semi-transparent surfaces, like perforated metal, to allow daylight and visibility into the interior are preferred. Shutter mechanisms should be concealed.
- 14.30. As per London Plan Policy D4, officers recommend an obligation be included as part of the S106 Agreement ensuring continuous involvement by a high-quality architect, in this instance, the scheme architects, Hawkins Brown and HTA.

15. Residential quality and amenity

- 15.1. London Plan Policy D6 sets out numerous standards and parameters to ensure housing is of the highest quality. The policy stipulates room sizes, aspects, daylight and sunlight standards and outdoor amenity space as well as other criteria. Similarly, Enfield Policy DMD 8 includes criteria that new residential development must meet.

Aspects

- 15.2. Policy D6 of the London Plan gives strong precedence to the development of dual aspect dwellings; single aspect dwellings are only acceptable where it is a better design solution to optimise site capacity, and will have adequate passive ventilation, daylight and privacy, and avoid overheating.
- 15.3. The proposal provides a high proportion of dual aspect units and this is to be commended.
- 15.4. According to the submitted Design and Access Statement, 97% of Plot B, 99% of Plot C and 98% of Plot D units will be dual aspect.
- 15.5. In order to maximise dual aspect units, deck access has been designed in for building circulation in some blocks. To preserve privacy in windows facing deck access, a condition is recommended that requires a venetian-blind style internal shutter up to eye level, approximately 1.8m in these windows.

Space standards and layouts

- 15.6. The application includes plans of all of the floors of all of the plots. These have been reviewed. While the individual rooms are not dimensioned in the plans submitted for approval, the applicant provided a document for reference, "Meridian One - Unit Layouts", which includes all of the unit types with dimensions. All units meet internal floorspace standards required by London Plan Policy D6, Table 3.1. and further meet individual room standards (London Housing Design Guide is cited as best practice in section 5.3 of the Development Management Document). Private amenity space will be provided to all units in the form of balconies and/or private gardens.
- 15.7. There are some unit layout comments that the applicant has addressed. Several of the proposed apartments had an open plan layout with no lobby area separating the bedrooms and living/kitchen areas. The applicant added doors in many instances, which is commended, although the issue remains in a few flats. This is unfortunate as noise from common areas can cause disturbance in private bedrooms.
- 15.8. There are a number of instances where bathrooms are located adjacent to external walls with no windows, therefore, no natural light and ventilation, which impacts accommodation quality and is less sustainable.
- 15.9. Likewise, there are instances where communal cores would have benefitted from natural light and ventilation via an external wall.
- 15.10. While officers would have liked to have seen these improvements be made, the layouts and standards of accommodation are overall acceptable.

Daylight and sunlight

15.11. The applicant has submitted a Daylight & Sunlight Report (2021) based on the Building Research Establishment (BRE) document 'Site Layout Planning for Daylight and Sunlight: A guide to good practice (2011)', which sets out the tests used to assess daylight and sunlight impacts of development on neighbours, future occupiers of the development and adjacent open spaces. The 2011 standards have been superseded by new 'Site Layout Planning for Daylight and Sunlight: a guide to good practice' (BRE, 2022). However, the 2011 standards were in place at the time of the submission of the application. The new guidance has not materially changed the assessment of the daylight and sunlight to neighbouring properties, as such, this element of the assessment would not be affected. What has changed in the approach to assessing internal daylight and sunlight, moving from Average Daylight Factor (ADF) to either Median Daylight Factor or Illuminance. In a note to officers, the applicant states that the new median values are generally lower than previously-used ADF levels. On this basis, officers acknowledge that the submitted assessment assumes more restrictive standards and still find results to be acceptable, as below.

Neighbouring properties: existing neighbouring properties

15.12. The analysis of daylight/sunlight impacts to neighbouring properties was performed using Vertical Sky Component which measures the amount of visible sky available from a point on a vertical plane. The impact is 'adverse' if the resulting value is both less than 27% and less than 0.8 times its former value.

15.13. The daylight/sunlight assessment submitted by the applicant considers the impact of Phase 1b on all existing bounding properties. The only set of properties that is impacted is Kimberley Road. These rear-facing terraces form the western boundary of Phase 1 and Phase 1a. Phase 1a development sits between subject Phase 1b and Kimberley Road. The analysis examines impacts to the rear, garden-facing windows of the terraced single family, two-storey homes and, in the first assessment, assumes Phase 1a is not constructed, i.e. there are no intervening buildings between Phase 1b and Kimberley Road. Although this scenario is unlikely, as Phase 1a is presently under construction, it helps to identify any impacts specifically generated by the subject proposal.

Daylight and Sunlight Analysis: Impacts to existing neighbouring properties

Address	Window	Existing VSC	Proposed VSC	Difference
59 Kimberley Rd	Ground R2 W2	19.6	15.5	21%
63 Kimberley Rd	Ground R1 W1	23	17.6	23.6%
71 Kimberley Rd	Ground R2 W2	20.1	14.8	26.5
75 Kimberley Rd	Ground R2 W2	17.1	13.0	23.9%
81 Kimberley Rd	Ground R1 W1	18.1	14.2	21.5%
83 Kimberley Rd	Ground R2 W5	18.1	13.3	26.5%
85 Kimberley Rd	Ground R1 W1	17.8	13.4	24.6%
87 Kimberley Rd	Ground R3 W4	18.0	13.9	22.7%
89 Kimberley Road	Ground R1 W1	17.5	12.8	26.9%
93 Kimberley Road	Ground R1			
	W3	17.2	12.4	28.1%
	W4	15.7	11.4	27.3%
	W5	18.9	13.6	28.1%
97 Kimberley Rd	Ground R1 W1	17.5	12.3	29.7%
109 Kimberley Rd	Ground R1 W1	17.7	13.6	22.9%

15.14. The table above lists all of the windows on Kimberley Road where there is a reduction in VSC that is considered adverse because the reduction exceeds 20% (or less than 0.8 times its former value) and the proposed VSC is less than 27. It is worth noting, however, that in all instances the existing VSC was already below 27, that is, below the minimum expected VSC. The applicant prepared a second equivalent assessment that includes the approved Phase 1a development with the proposed Phase 1b development to determine whether there is any change in impacts to VSC. For all windows that experienced an impact in the first assessment (with Phase 1b but without Phase 1a), there was a greater impact to VSCs with the addition of Phase 1a into the model, with the exception of 75 Kimberley Road, where the impact stayed the same. This suggests that the present proposal, Phase 1b, results in no greater impact to the daylight/sunlight impacts of neighbouring properties and the results of the analysis on existing neighbouring sites are acceptable.

Neighbouring properties: Phase 1a

15.15. Average Daylight Factor (ADF) is a measure of the light within a room – specifically the average indoor illuminance (from daylight) on the working plane within a room. ADF has been used to assess the level of light in Phase 1a as a new development that is presently under construction. The assessment measures the impact of the proposed development of Phase 1a, which is immediately to the west of the proposed Phase 1b. Recommendations are ADF of no less than 2% for kitchens, 1.5% for living rooms and 1% for bedrooms.

Daylight and Sunlight Analysis: Impacts to Phase 1a

Building	Total rooms	Impacted living rooms	Impacted kitchen/diners	Impacted L/K/D	Impacted bedrooms
Block A2	151	0	2	5	4
Block A1	131	2	0	0	18
Block E2.3A	27	0	0	0	0
Block E 1.2	82	0	3	0	0
Block E 2.1	46	0	0	0	0
Block E 2.2	44	0	0	0	0
Block E 2.3	18	0	0	0	0
Block E 1.1	114	0	0	0	0

15.16. The table above summarises all of the Phase 1a buildings that were modelled for daylight/sunlight impacts, the total number of rooms assessed in each building and the numbers of living rooms, kitchen/diners, living/kitchen/diners or bedrooms impacted where the ADF fell below recommended levels. All affected rooms are on lower floors (ground, first, second and third floors). In total, 613 rooms on Phase 1a were assessed. Of these, 34 rooms are impacted adversely; this represents 5.5% of windows analysed. Two-thirds of the affected rooms are bedrooms, which carry the lowest recommended ADF, given their primary functions and reliance on natural daylight. In an urban context, the loss of light to rooms on lower floors is a factor of development. Given the low proportion of windows that are affected and the overall very good levels of light in the vast majority of Phase 1a – on balance – the impact of the proposed development in this regard is accepted.

Future occupiers

- 15.17. Average Daylight Factor (ADF) has been used to assess the level of light in the new development. Recommendations are ADF of no less than 2% for kitchens, 1.5% for living rooms and 1% for bedrooms.

Block B			
<i>Room Type</i>	<i>Target ADF</i>	<i>Total rooms</i>	<i>Rooms that meet ADF</i>
L/K/D	2%	96	96 (100%)
Living room	1.5%	32	32 (100%)
Bedroom	1%	270	201 (74%)
Living / Dining	1.5%	8	8 (100%)
Kitchen / Dining	2%	32	32 (100%)
Kitchen	2%	8	8 (100%)
Block C			
<i>Room Type</i>	<i>Target ADF</i>	<i>Total rooms</i>	<i>Rooms that meet ADF</i>
L/K/D	2%	87	85 (98%)
Living room	1.5%	33	28 (85%)
Bedroom	1%	237	170 (72%)
Living / Dining	1.5%	4	4 (100%)
Dining	1.5%	2	2 (100%)
Kitchen / Dining	2%	24	21 (88%)
Kitchen	2%	2	2 (100%)
Block D			
<i>Room Type</i>	<i>Target ADF</i>	<i>Total rooms</i>	<i>Rooms that meet ADF</i>
L/K/D	2%	90	90 (100%)
Living room	1.5%	4	4 (100%)
Bedroom	1%	141	127 (90%)
Dining	1.5%	4	4 (100%)
Kitchen	2%	4	4 (100%)

- 15.18. The Internal Daylight & Sunlight Report (November 2021) demonstrates that, overall, the ADF measures are very good; in the large majority of instances, ADF levels exceed standards. The room typology that most experiences ADF levels below standards are bedrooms – making up 93% of deviations. The majority of bedrooms are recessed with balconies, and the overhang element contributes to the lower light levels. Without the balconies, which are a valuable amenity, light levels to bedrooms would be improved. In general, the ADF measures improve on higher floors, where bedrooms on 6th, 7th and 8th floors that were assessed are within 0.2% of target ADF levels. The flat layouts have been designed to prioritise natural daylight to living areas, which is consistent with BRE guidance. Bedrooms, given their primary functions, have lower expected light levels than living rooms and kitchens.

- 15.19. There are only 11 remaining non-bedrooms that fall short of recommended ADF levels. For a proposal of this scale, it is recognised that the considerable majority of living areas have acceptable light levels.

- 15.20. Overall, given the scale of the proposal, practical layouts that respond positively to conditions and beneficial level of amenity, the level of light to units in Phase 1b is considered acceptable.

Overshadowing

- 15.21. A review of the development's impact to sunlight on adjacent open spaces, both existing and proposed, indicates that almost all open spaces will generally receive

an acceptable amount of sunlight, measured as a minimum of two hours on 21 March. The only area of deficiency is the shared podium open space on Plot B, where approximately a third of the surface area will achieve a minimum of two hours on 21 March. While not a replacement of private common outdoor space, Plot B is within immediate distance of the Northern Park on Phase 1a and Pymmes Wood being proposed with Phase 1b, both of which offer a variety of outdoor opportunities, including quieter, landscaped space that is available on the podium level. Given availability of alternative spaces for residents of Plot B, the fact that there remains a relatively sunny area of open space accessible to residents towards the square, and the podium is generously planted and serviced by play equipment, and that all other spaces meet sunlight amenity standards, on balance, this amount of overshadowing is accepted.

Inclusive Design

- 15.22. Policy D7 of the London Plan states that at least 10% of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings', and ii) all other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings.' At a local level, policy DMD8 of the Development Management Document has similar policy objectives.
- 15.23. The proposal achieves the requirement that 10% meet requirement M4(3) as 'wheelchair user dwellings.' All remaining units meet M4(2) 'accessible and adaptable dwellings' requirements.

Fire Safety

- 15.24. London Plan Policy D 12 outlines that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they follow a set criterion. Part B of the policy outlines that all major development proposals should be submitted with a Fire Statement which is an independent fire strategy, produced by a third party, suitably qualified assessor.
- 15.25. This application is submitted with a Fire Safety Statement (November 2021) and RIBA Stage 3 Fire Strategy (November 2021).
- 15.26. The Health and Safety Executive is the statutory consultee on matters of fire safety for buildings of 18m or 7 storeys in height, whichever is reached first. The HSE identified issues of a single escape being used for residential as well as ancillary uses, such as refuse storage and bicycle parking. The applicant made amendments to ground floor plans to separate uses in line with fire regulations. The HSE reviewed these changes and removed objection from its consideration.
- 15.27. The submission was additionally reviewed by LBE Building Control who agreed that the matter of single escape had been satisfactorily resolved in accordance with fire regulations.
- 15.28. It is recommended that planning conditions require compliance with an updated Fire Strategy to reflect compliance with HSE's comments in accordance with London Plan Policy D12 and DMPO 2015.

Secured by Design

- 15.29. London Plan Policy D11 and Core Policy 9 promote the integration of design measures that create safe and secure environments for the community. This is seen as integral to good design.
- 15.30. The applicant engaged with the Designing Out Crime Office of the Metropolitan Police during the design phase, and Enfield consulted the Met during this application review. The Designing Out Crime Officer provided comments.
- 15.31. The Met appreciates that the applicant was proactive in seeking advice on meeting Secured by Design requirements. The Designing Out Crime Officer seeks for the scheme to achieve the Homes Silver Award aspiring to Gold. The Met officer welcomes further engagement on landscaping, lighting and appropriate CCTV measures in an effort to achieve a Secured by Design Gold Award for the whole of Meridian Water.
- 15.32. In order to ensure Secured by Design standards are met, conditions are recommended that the applicant seeks 'Secured by Design' Accreditation prior to commencement and 'Secured by Design' Certification prior to occupation of each building. Further, the commercial element of the scheme should achieve certification at the final fitting stage.

16. Open Space, Play Space, Landscaping and Trees

Open space and landscaping

- 16.1. London Plan Policy D6 sets out standards for housing quality and requires a provision of private open space to meet the needs of the new and existing occupants of the site and Policy G4 encourages development to provide new areas of open space where possible. The London Play and Informal Recreation SPG sets standards of quantity and quality in the provision of new play spaces. Enfield Policy DMD 72 calls for all new major development to provide open space that is suitable to the needs introduced by the new development. Policy DMD 73 further sets out the Council's expectations around the delivery of play spaces. The emerging Local Plan identifies the value of informal, doorstep and play-on-the-way spaces that are integrated into landscape design.
- 16.2. The Application Site presently includes no open space, either public or private. All of the proposed open space has been designed to be integral to the site plan and to fulfil Edmonton Leaside Area Action Plan Policy EL9, which calls for suitable open space and play space.
- 16.3. On Phase 1, Phase 1a has already been approved to deliver 4,554 sqm of open space. Notable among these spaces is the quarter-hectare Northern Park, a richly-landscaped open space with active and creative play facilities for children of all ages. As Phase 1 has been designed to be a cohesive development, the provision of open space is assessed for all of Phase 1, including Phases 1a and presently-proposed 1b together.
- 16.4. Phase 1b proposes 8,344 sqm of open space comprising three main spaces. The applicant has also included some areas of Park Street in the open space calculation based on the qualities of those areas. With the proposal, the quantity of open space for all of Phase 1 equates to 0.58 ha per 1,000 people based on population yields. Text supporting Policy DMD 72 cites a proportion of 2.37 ha/1,000 residents and the 2021 Enfield Blue and Green Strategy aims for 2.15 ha/1,000 residents. It is important to recognise that these target proportions are

borough-wide figures that are used to guide strategic decision-making and are not site by site standards to be met. The Meridian Water masterplan anticipates a high-density urban development that will provide open space in balance with 50% affordable housing on Phase 1, 676 additional homes, commercial space to support an active station and civic square, a medical facility to accommodate a GP service and a leisure space. This blend of uses is needed to make it a vibrant and viable place. On its own, the approved reserved matters for Phase 1a provide a proportion of 0.61 ha/1,000 residents of open space. Given the higher density of development on Phase 1b, it is commendable that the proposed site plan accommodates a proportionate amount of open space to Phase 1a. The quantum of open space proposed on Phase 1b is accepted.

- 16.5. In general, the landscape approach is of a high-quality and well-considered. The landscape plan appropriately identifies different areas of function and character, and improves connections to existing green spaces and water courses.
- 16.6. Station Square serves as the point of arrival at Meridian Water, with steps to it descending from Meridian Water station. It has many functions, including a landing from the station, transient space for commuters, a dwell space for people meeting and visiting commercial spaces, spill out space and a setting for tall buildings. The square is framed by the station on the east, Plot B on the north, Plot D on the south and Park Street on the west. Although severed by the rail line, the Square is an extension of Meridian Water's Central Spine on the east side of the tracks, with a focus of active, commercial frontages on the ground floor. Station Square has the qualities of a civic space, with seating integrated into the landscape, a feature fountain and room for café seating spilling from bordering shopfronts. Desire lines have been considered, providing movement corridors to the northwest and southwest corners of the square and converging on the station steps, with the landscape geometries reinforcing these routes.
- 16.7. The primary concern of officers has been the positioning of trees covering the majority of the centre of the square. The trees infringe upon the potential uses of the space (for markets, events, for example) and impact views through and legibility of the space. The applicant does not wish to amend the proposal. It is acknowledged, however, that trees have the advantage of providing visual relief and softening an area predominantly hard surfaces; they provide habitat, shading, wind and flood mitigation. While it is still the officers' view that the trees will challenge the functioning of the square as a fully adaptable civic space, a condition is recommended that requires details of the tree species selected for this space that will enable installation of stalls or similar structures, such as food trucks, of a certain height.
- 16.8. The inclusion of a water feature is strongly supported. However, details of the design and materials are not provided on the plans and therefore this should form the subject of a condition.
- 16.9. On balance, Station Square is designed to be a high quality space that will become the centre of Phase 1.
- 16.10. Pymmes Wood in the north of Phase 1b is intended as an open space prioritising the promotion of ecology and biodiversity, made up of native planting, integral habitats for a diversity of species and making the most of its waterfront location on the Pymmes Brook. Pymmes Wood is landscaped to be largely uninterrupted, allowing wildlife to prosper, with seating and walking paths along a circular path that winds around planting. Pymmes Wood is proposed to be a beneficial addition

to the open space provision on Phase 1. Despite level changes, inclusive access is maintained from the west and south and throughout the interior. The space is well designed, with interesting raised boardwalks and paths encouraging use for informal recreation and exercise, while providing more open areas for activities to take place. It addresses policy calls for increased green infrastructure, biodiversity and improved access to watercourses. While Pymmes Wood's attractiveness is based in its character as a quiet and serene space, it is crucial that the selection and placement of planting maintains clear visibility into and from the park. Adjacency of Pymmes Wood to the North Circular, Pymmes Brook, rail bridge on the east, and pressure reduction station on the west means sight lines from Phase 1b need to be maintained. Officers recommend that the condition for planting details includes details specific to Pymmes Wood to ensure planting is appropriate to the maintenance of sight lines.

- 16.11. An important element of Pymmes Wood and Phase 1 is the naturalisation of Pymmes Brook. In addition to river restoration, the works to Pymmes Brook will enable flood management, as further discussed in the flood policy consideration. The Phase 1 outline permission requires the naturalisation of the segment of Pymmes Brook within the Application Site and it is expected to be delivered with Phase 1b. Enfield Core Strategy Core Policy 29 supports river restoration, Core Policy 38 maintains this objective specifically for Meridian Water. Development Management Document policy DMD 75 promotes the unlocking access to waterways. Policies EL12, EL27 and EL28 of the Edmonton Leaside Area Actions Plan require the enhancement of watercourses and restoration of rivers, namely Pymmes Brook, among others.
- 16.12. The applicant submitted a "Pymmes Wood Sketchbook" (July 2022) and corresponding drawings setting out the proposal for naturalising the Pymmes Brook. The document includes a lowering of the southern bank wall along the Pymmes Wood northern boundary, removal of the mid-channel wall, in-channel floating structures to support vegetation and wildlife, shelves with aquatic planting, gravels on the channel base and planting transitioning into the park. In principle, these naturalisation measures are supported by officers and are consistent with the intention for naturalisation required in previous approvals.
- 16.13. On 5 September, the applicant submitted flood models and a Flood Risk Assessment, which include the elements of naturalisation represented in the submitted Sketchbook, as well as mitigation to the lowering of the southern brook wall that involves constructing a raised bund 5 metres inland of the brook edge, which impacts the proposed design of the Pymmes Wood. The EA has completed review of the models that are most pertinent to the proposal and has identified several "Amber" issues. The EA has expressed confidence that these issues can be addressed by the applicant with further work in order for the EA to be able to accept the flood models. If the EA and LLFA accept the models and corresponding FRA, it is anticipated that conditions will be recommended, including one that requires details of the naturalisation works, and any associated updates to the model and FRA. In landscaping and ecological terms, the principles of the naturalisation proposal set out in the "Pymmes Wood Sketchbook" are acceptable. However, without an understanding of the flood risk introduced by these interventions, the EA and Council water courses officers have not yet been able to fully remove their objections on grounds of flood risk. Discussions are on going to resolve the residual issues and Officers will provide an update in advance of the meeting of the Planning Committee.

- 16.14. The Cadent pressure reduction station (PRS) which has been separately consented occupies a brook-front area immediately to the west of Pymmes Wood. It is understood that the PRS and corresponding utilities require protection and there will be measures to prevent access to the space. It is essential that the landscaping and any fencing or barriers surrounding the PRS area are of a high quality and integrate appropriately into the landscaping – they cannot detract from the quality or experience of Pymmes Wood. As part of the condition requiring planting details, as well as details of treatments and furniture, details will be required for any landscaping, additional enclosure, between the PRS existing walled enclosure and the Application Site area or boundary.
- 16.15. The Southern Park at the southern end of Phase 1b adjacent to Plot C comprises a large circular area of open lawn surrounded by scattered ‘woodland’ nearest the highway to enclose the park. Paths cross through and around the grass. The lawn is lowered to allow attenuation in certain flood events, and there is additionally a swale at the southern tip. The park is a suitable complement to the other larger open spaces on Phase 1 – it is open with sparse furniture, allowing adaptable passive and active use by visitors. The southern park is a positive element that punctuates the routes to the station from the south and western entrances to Meridian Water Phase 1. The circular form of the space and use of totems reference the heritage of the site through the form and materiality of the gas holders. The detailed design of the totems will be essential in achieving the desired result and should be secured via a condition.
- 16.16. The application also proposes enlargement of the open space at the entrance to Phase 1 from Leaside Road, in addition to the area in the Phase 1A application. This delivers a more joined-up approach to the entrance.
- 16.17. Connecting the proposed open spaces and functioning as a spine on Phase 1 is Park Street. While the street includes carriageway for two-way vehicular access, most of the street width is programmed with landscaping and pedestrian space. On-street parking is limited, reinforcing the importance of this street and aiding legibility by marking the route as significant in reaching the rail station. There is a 3-metre footway on each side of the street. On the east side, the footway is separated from roadbed with a 1.25-metre planting strip. On the west side, there are ‘garden’ strips of between 4.2 to 5.7 metres in width that sit between the pavement and roadbed. The garden beds include planting, seating and play features such as stepping stones and sensory elements like fixed instruments. There are loading bays to support commercial and residential uses located at a few points along the street. The ambition of Park Street is supported – it is thoughtfully designed to be a prominent green feature that sets a desirable example for Meridian Water. The success and longevity of the street relies heavily on the selection of planting, trees, materials and long-term maintenance.
- 16.18. The application includes General Arrangement plans, Planting Plans and an Outline Planting Schedule. A condition is recommended that the landscaping, public realm and highways improvements should be built out in accordance with the General Arrangement Plans, and that finer details of the hard and soft landscaping, alongside details of enclosure, lighting, bins, baffles and furniture/play equipment are submitted for review. The condition should clarify that the Planting Plans and Outline Planting Schedule are indicative and officers may advise alternate, comparable solutions to the ranges set out in the strategy when details are reviewed and soil volumes to support the planting are fully resolved. As has been noted, there is an opportunity for the details of these elements to

reference the industrial heritage of the site; this will be encouraged when detail applications are made.

- 16.19. The open space at the top of the tower in Plot D presently has no planting or furniture. It is understood that this is being delivered to “shell and core”, therefore the treatment of this space should be the subject of a planning condition. Generous planting, seating and other residential amenities should be provided in the space. The inclusion of structure planting and trees will further refine this tower top element.
- 16.20. In sum, the landscaping approach is supported. In addition to the spaces approved in Phase 1a, the present proposal for Phase 1b together provide a varied and rich choice of open spaces to serve the needs of residents and visitors to Meridian Water. They have been designed carefully to function as open spaces while having the potential to provide considerable ecological benefits. Good maintenance will be key to the success of the open space, an Estate Management Plan is being secured via S106 that will set out the maintenance of the site.

Play space

- 16.21. The London Plan, the London Play and Informal Recreation SPG and Policy DMD 73 all recognise that new development generates a need for suitable play space based on estimates of children that will occupy the site. It is generally expected that play provision is delivered on site – where this is not possible, there are means to meet needs off-site, most often through a planning obligation.
- 16.22. The London Play and Informal Recreation SPG provides a comprehensive set of guidance on the amount of play space need a development generates per age group and advises what form the play space should take to satisfy the needs. The table summarises the amount of play space expected of the proposed development and how much is provided on site as part of the application.

Phase 1a and 1b child yields and play space required

	1a child yield	1b child yield	Total child yield	Required
Age 0-4	67.2	134.1	201.3	2,013 sqm
Age 5-11	71.8	134.2	206	2,060 sqm
Age 12+	61	67.7	128.7	1,287 sqm
Total				5,361 sqm

- 16.23. In addition to the areas of play already approved as part of Phase 1a, Phase 1b proposes various play amenity interspersed throughout the site plan. In total, all of Phase 1 will provide 1,886 sqm of doorstep play, which is also referred to as play on the way, or incidental play. This type of provision is integrated into landscaping and most suited to the youngest age groups, generally 0-4 years. For ages up to 11 years old and youth play for ages above 11 years, local playable and youth space are needed. Local playable space is delivered on Phase 1a within Northern Park and an open space along the western border of Phase 1a. Youth play is provided in Northern Park and further available on Southern Park. In total, there are 5,461 sqm of play area accommodated on Phases 1a and 1b, which just exceeds the requirement based on child yields.
- 16.24. In terms of quality of play space, the London Play and Informal Recreation SPG further sets out what form play space should take relative to the size and nature of

the development. This proposal generates a requirement for all play types: doorstep play, local playable space and youth play. Doorstep play is extensively incorporated into Phase 1b, with informal features provided on all three building podia, on Station Square and along Park Street. The naturalistic, cohesive and incidental nature of the play features is a strength and complies with the direction of play design promoted by the London Plan, adopted guidance and increasingly Enfield emerging policy. Local playable space is generally suitable for children up to age 11 and should have natural landscaping, integrated play equipment for swinging, sliding and climbing, space for ball play and seating for supervision. A neighbourhood playable space is larger and allows for biking, skateboarding, basketball and lots of active play. A diversity of play features and opportunities for a range of ages is designed into Northern Park, which totals 2,500 sqm. Southern Park makes a further addition of open, flexible play area.

- 16.25. In conjunction with play provision on Phase 1a, the proposal for play amenity on Phase 1b is suitable, well-designed and appropriate for Phase 1 or Meridian Water.

Trees

- 16.26. Policy G7 of the London Plan requires existing trees of value to be retained, and any removal to be compensated by adequate replacement, based on the existing value of benefits. The Policy further sets out that planting of new trees, especially those with large canopies, should be included within development proposals. Additionally, Policies G1 and G5 refer to green infrastructure and urban greening, which can be incorporated within the development.
- 16.27. At a local level, Policy DMD80 of the Development Management Document stipulates that developments do not result in any loss or harm to trees of significant biodiversity or amenity value, or adequate replacement must be provided whilst the Draft Local Plan outlines the benefits that trees offer to people and the environment by improving air quality, reducing noise pollution, contributing to climate change adaptation and reducing the urban heat island effect. Additionally, Policy DMD 81 of the Development Management Document refers to landscaping.
- 16.28. As Phase 1b is a brownfield site that was recently cleared and remediated, there are no existing trees and no trees are proposed to be removed in aid of the proposed development.
- 16.29. The application includes a series of General Arrangement plans that include locations and indicative selections of hardscape, edgings, railings, furniture and play equipment. These are accompanied by a series of Planting Plans that show indicative soft landscaping features, and an Outline Planting Schedule with selections of plant and tree species. These drawings have been further supported by a Landscape Design Statement (December 2021) that illustrates the intent for areas of open space.
- 16.30. In order to further inform the viability of the tree strategy, the applicant provided Tree Pit Volume Sketches demonstrating the sizes of tree pits. While the extent of tree planting and ambition of the landscape strategy is welcomed, there is concern that the soil volumes in many locations are too small to support larger trees, which limits varieties to small tree species. Trees are also shown to be planted densely or in areas too close to hardstanding, which could lead to competition and stunting. In order to accommodate larger species, greater canopy cover and

include the types of trees that are suitable to the scale of development at Meridian Water, it is recommended that a further detailed planting plan is conditioned. The planting plan should:

- have generously-sized tree pits that can accommodate a range of species, including larger species and trees that can grow to more advanced maturity, provide cover and enhance biodiversity;
- distribute tree pits and planting areas to allow space for vigorous growth, away from the edge of hardstanding;
- design underground space with generous soil volumes and planting space to allow space for roots; this does not need to be dictated by the geometry of hardstanding above;
- provide a palette of tree species that range in size and are appropriate to the scale and quality of development.

Impact to Epping Forest Special Area of Conservation (SAC)

- 16.31. Natural England wrote to relevant Councils on 20th September 2018, in relation to the establishment of the Epping Forest Special Area of Conservation (SAC) Strategic Mitigation Strategy. Natural England have established a recreational 'Zone of Influence'. Any residential development (proposing 100 plus units) within 6.2km of the SAC is required to deliver a package of avoidance and mitigation measures as well as make a financial contribution to strategic measures as set out within the costed Strategic Access Management Measures. This is to adequately mitigate, on a site by site basis, any recreational impact on the SAC that is located within the Zone of Influence.
- 16.32. Natural England were consulted on this application and outlined the applicant should be supported by a Habitats Regulations Assessment (HRA). The applicant provided a Shadow Habitats Regulations Assessment (June 2022) and subsequently a revised Shadow Habitats Regulations Assessment (August 2022), which were submitted to Natural England.
- 16.33. Natural England confirmed that they agree with the assessment conclusions and, providing all mitigation measures outlined within the HRA are secured, Natural England has no objection and considers any impacts on the Epping Forest Special Area of Conservation (SAC) and underpinning Site of Special Scientific Interest (SSSI) can be appropriately mitigated. The mitigations measures that Natural England has agreed to and will be secured via S106 are:
- Appropriate SAMM payments for each housing unit coming forward as part of the development.
 - It has been agreed with the applicant that the appropriate SAMM payment is £14 per unit.
 - Appropriate SANG payments to go towards the avoidance and mitigation measures outlined in the Shadow HRA dated August 2022. The measures identified comprise:
 - £600k towards the Quieter Neighbourhood / Claremont Street route
 - £800k towards Florence Green Park and associated neighbourhood greening
 - £100k towards Angel Edmonton greening

The above amounts are contributions made in the form of Off-Site Open Space Enhancement and Maintenance Contributions secured in the S106 agreement attached to Phase 1 outline permission

Natural England accepts, as mitigation, a further £521,379 Off-Site Open Space Enhancement and Maintenance Contribution arising from the uplift in residential units proposed as part of this application which will also be secured as part of any S106 Agreement.

- 16.34. The applicant's Shadow HRA is being assessed by the Council's Ecological Consultant, having already been assessed by Natural England who have confirmed that they agree with the assessment conclusions subject to all avoidance and mitigation measures outlined within the HRA being secured. An update will be provided to Committee to confirm that the HRA can be adopted by the Council as Competent Authority in order to comply with the Habitat Regulations. It is considered that the development will not give rise to significant effects on the Epping Forest SAC, a European designated site subject to securing through the S106 Agreement the above identified avoidance and mitigation measures.

Urban Greening Factor (UGF)

- 16.35. Policy G5 of the London Plan sets an Urban Greening Factor target score of 0.4. The Urban Greening Factor calculation included in the Landscape Design Statement (December 2021) submitted with the application provides a score of 0.47, which exceeds the London Plan target for residential development. This is considered acceptable.

17. Biodiversity and Ecology

- 17.1. The NPPF (Para.174) requires planning decisions to protect and enhance sites of biodiversity value, providing net gains for biodiversity and establishing resilient ecological networks. London Plan policy G1 requires developments to provide elements of green infrastructure. Policies G5 and G6 requires developments to incorporate urban greening, manage impacts on biodiversity, secure a net biodiversity gain and provide access to nature. At a local level, policy CP36 of the Core Strategy requires development to protect, enhance, restore or add to existing biodiversity including green spaces and corridors. Development Management Document policy DMD 78 requires major development to maximise opportunities for nature conservation. Draft Local Plan policy G14 refers to the need to promote qualitative enhancement of biodiversity sites and networks and encourage the greening of the Borough. The emerging Local Plan, although of lesser policy weight, includes Policy BG3 which refers to a minimum of 10% net gain.
- 17.2. The provided Biodiversity Metric 3.0 calculation tool developed by Natural England yields a 20.02% increase in habitat units, a 100% increase in hedgerow units and a 31.2% increase in river units. Based on these calculations, the development results in a net gain in biodiversity, well in excess of policy.
- 17.3. The Core Strategy Policies Map identifies the rail line as being in a Wildlife Corridor and the Edmonton Leaside Area Action Plan Policies Map identifies the track as being a Site of Local Importance of Nature Conservation.
- 17.4. The proposal includes an ecological corridor that runs along the length of the rail line to a width of six metres, only interrupted by the station stairs, and terminating

in Pymmes Wood at the north of the site. The corridor is proposed to be planted, landscaped and arranged to promote a diversity of species habitats. Planting will provide sufficient woodland canopy to attract wildlife and allow opportunities for retained water. The corridor will comprise scrub and woodland, wet areas, grassland and wildflowers, areas of gravel and structures such as bat boxes. To overcome the separation by the staircase, trees are planted either side of the station. A condition is recommended that the details of the ecological corridor be submitted for approval. Additionally, there will be a requirement provisions in the S106 Agreement to cover details of any for maintenance and monitoring of the ecological corridor..

18. Transport, Access and Parking

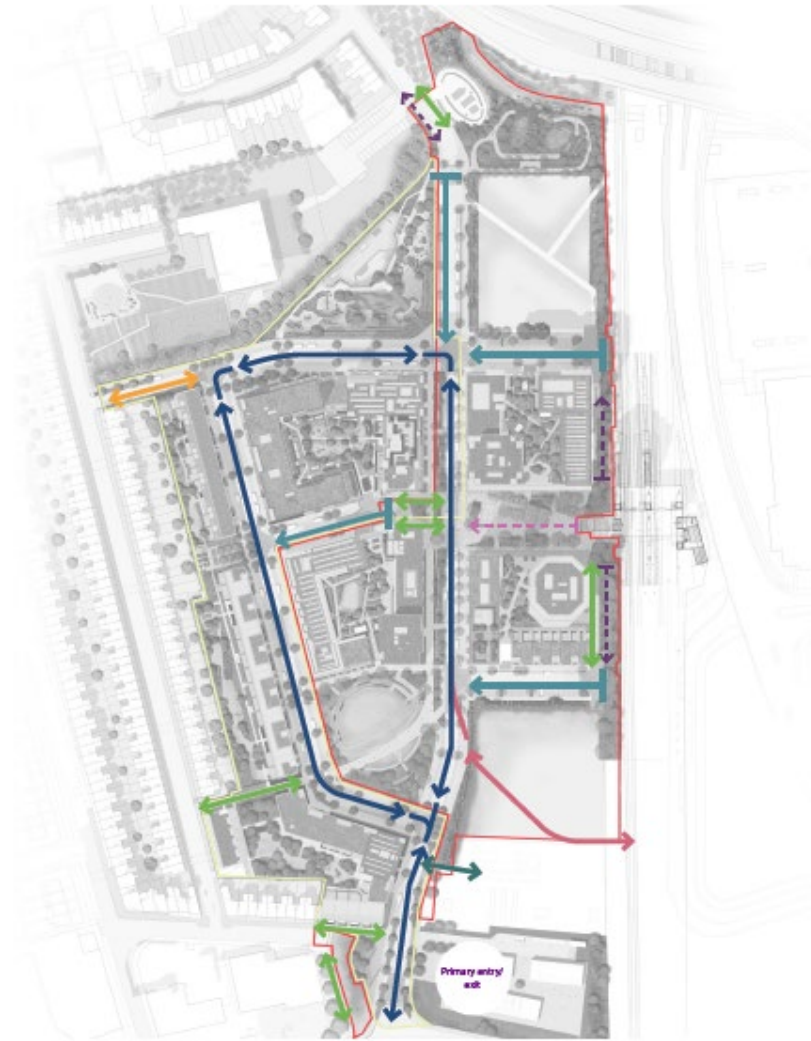
- 18.1. London Plan (2021) Policy 6.1 encourages partnership working in terms of transport and development that reduces the need to travel, especially by private vehicle whilst also supporting development with high levels of public transport accessibility and/or capacity. The policy supports measures that encourage shifts to more sustainable modes of transport. The London Plan 2021 Policy T1 and the Mayor's Transport Strategy set out an ambition for 80% of journeys to be made by sustainable transport modes – that is by foot, cycle or public transport – by 2041. In keeping with this approach, it is accepted that proposed development should support this aim by making effective use of land, reflective of connectivity and accessibility by sustainable travel modes. Meanwhile, the Mayor's 'Healthy Streets' driver looks to reduce car dominance, ownership and use, whilst at the same time increasing walking, cycling and public transport use.
- 18.2. Other key relevant London Plan policies include:
- Policy T2 – sets out a 'healthy streets' approach to new development and requires proposals to demonstrate how it will deliver improvements that support the 10 Healthy Street Indicators;
 - Policy T3 – requires new development to safeguard sufficient and suitably located land for public and active transport;
 - Policy T4 – calls for development to reflect and integrate with current and planned transport access, capacity and connectivity and, where appropriate, mitigate impacts through direct provision or financial contributions; and
 - Policy T5 – promotes the provision of an accessible and safe bicycle network with cycle routes and sufficient cycle parking;
 - Policy T6 – indicates that car-free development should be the starting point for all locations that are well-connected by public transport and requires parking bays for disabled persons.
 - Policy T7 – makes clear that development should facilitate safe, clean and efficient deliveries and servicing and requires Construction Logistics Plans and Delivery and servicing Plans.
- 18.3. Core Strategy (2010) policies aim to both address the existing deficiencies in transport in the Borough and to ensure that planned growth is supported by adequate transport infrastructure that promotes sustainable transport choices. Specifically, Core Policy 25 requires development to prioritise pedestrian and cycle public realm improvements that contribute to quality and safety; Core Policy 24 requires development to deliver improvements to the road network, and Core Policy 26 requires development to ensure a safe, accessible, welcoming and efficient public transport network. The underlying approach is to ensure that travel

choice across the Borough is enhanced to provide everyone with the opportunity to decide how they choose to travel, be that by car, public transport or walking and cycling. Development Management Document (2014) Policy DMD 45 Parking Standards and Layout states that the Council aims to minimise car parking and to promote sustainable transport options.

- 18.4. The Edmonton Leaside Area Action Plan Policy EL6 identifies the Central Spine as being key to connecting sites within the Meridian Water masterplan itself, as well as being a vital infrastructure corridor. While an essential link to Phase 1b, the Central Spine is east of the Application Site and the Meridian Water rail station. Policy EL7 calls for rail and bus improvements.

Pedestrian connectivity

- 18.5. As a large brownfield site that has been cleared and remediated in recent years, Meridian Water Phase 1 presently has temporary pedestrian access through the site to allow a route to the station. Permanent walking routes to and through the site are lacking or compromised by major, predominantly vehicular roads such as Leaside Road to the south of the Application Site, Angel Edmonton Road to the east and the North Circular Road to the north. Although more granular in its street layout, the Edmonton neighbourhood to the west backs onto Phase 1 with Kimberley Road, a long uninterrupted row of two-storey terraces with no point of access into the site, although access points are being created as part of Phase 1 works.
- 18.6. The Phase 1 road network begins to stitch the development into surrounding streets whilst also anticipating further development of Meridian Water links to the east, past the West Anglia Mainline.
- 18.7. On the whole, the Phase 1 masterplan delivers an arrangement of streets that prioritises travel in line with the Mayor's Transport Strategy, giving precedence to safe and legible pedestrian access and cycling routes, providing new and reinforced public transport facilities, and finally vehicular and servicing access where essential.
- 18.8. Park Street acts as the central spine extending from the North Circular to Leaside Road, and, while enabling a vehicular loop around Plots A, C and Southern Park, the street is designed to be a generously landscaped route with comfortable areas of paving, incidental play and raised tables at crossings to moderate traffic speeds. East-west routes to the station and to Edmonton give priority to pedestrians and cyclists. Open spaces are also designed to provide clear, cross-cutting paths.



- Primary two way vehicle and cycle circulation
- Pedestrian and cycle only
- Restricted car and cycle two way access
- Secondary two way street
- Service and maintenance and emergency only access
- access
- Delivery only pull in space

18.9. A condition is recommended to demonstrate how pedestrian and bicycle access through the site to the station will be maintained during construction.

18.10. The proposed approach makes a positive contribution to pedestrian provision across the Application Site.

Cycle access and parking

18.11. The proposed site and road layout beneficially connect the site into the cycle network, including the emerging Green Loop.

- 18.12. Cycle parking will be provided in line with London Plan T5 requirements for both long and short stay, as well as accessible provision.:

Cycle parking

	Long stay			Total	Short stay
	Two-tier	Accessible Sheffield	Adaptable and/or cargo		Sheffield
Plot B	330	42	42	414	7
Plot C	220	28	28	276	6
Plot D	416	66	4	486	8
				<i>Total</i>	<i>1176</i>
					<i>21</i>

- 18.13. Cycle parking for commercial uses will meet London Plan standards with at least two short-stay and two long-stay cycle parking spaces.
- 18.14. The street design north of Plot B has been amended to provide level access and crossing points in front of residential cores, particularly to support disabled parking. This is strongly supported. A condition is recommended to confirm level access is maintained for unloading and crossing purposes.
- 18.15. It is recommended that the final parking provision is secured by condition, with detailed drawings clearly stating the types of parking provision and dimensions for all cycle parking, in line with Chapter 8 of the London Cycling Design Standards.

Public transport

- 18.16. The West Anglia Mainline and Meridian Water station form the eastern boundary of the application site. The nearest bus stop is to the east of the site on Glover Drive served by the nos. 192 and 341 bus routes. At present, the application site has a Public Transport Accessibility Level (PTAL) of 2, on a scale of 0-6b, where 6b is highest and 0 the lowest. This is due to increase as increased bus and rail services are introduced.
- 18.17. The recent approval for Strategic Infrastructure Works (SIW) including a primary road network through the wider masterplan area, and the new pedestrian link across the West Anglia line to Meridian Way will improve bus access for this phase of development. On that basis, buses will not need to operate through this site in the future, and therefore the design and layout of the on-site road network prioritises pedestrian and cycle access as well accommodating freight/ servicing vehicles.
- 18.18. The SIW will result in the reconfiguration of bus stops on Glover Drive. Nonetheless access to these stops will be via the signal crossing on Meridian Way. This means that parts of Phases 1a and 1b are about 400 metres from these stops. In order to mitigate distances from bus service, the applicant submitted the Leaside Road Bus Stop Options Review (19 April 2022) which recommends locating two bus stops on Leaside Road on LB Haringey highway. Following review of the study by Enfield, Haringey and TfL officers, it has been agreed that S106 obligations secure detailed design work, a Road Safety Assessment and further review by Enfield, Haringey and TfL before being delivered.

Vehicular Access and Parking

- 18.19. It is supported that the main vehicular access into Phase 1 is from Leaside Road. The street configuration enables a two-way vehicular loop around the site on the

west side of Park Street, encircling Plots A, C and Southern Park. This provides adequate car entry into Phases 1a and 1b. Service, maintenance and emergency access are available to Park Street from the north. The prioritisation of road provision for pedestrians and cyclists accords with the low parking provision for Phase 1b, which supports improved public realm, healthy streets principles and road safety.

- 18.20. The Phase 1 outline permission set out a parking ratio of 0.6 with the option to reduce to 0.4. In consideration of current London Plan policy, which supports car-free development where possible and a maximum ratio of 0.25 in the Upper Lee Valley Opportunity Area, as well as the delivery of transport infrastructure investments at Meridian Water, including more frequent rail and bus services, it is appropriate that the parking ratio for Phase 1b should be lower:

Parking provision

	Parking ratio	Units	No. spaces
Phase 1 outline	0.4	725	290
Phase 1a	0.4	300	120
Phase 1b	0.1	676	66
		Difference from Phase 1 outline	-104

- 18.21. It should be noted that trip generation analysis has been undertaken and this indicates that the lower vehicle parking ratio, improved public transport provision and changes to trip patterns arising from greater levels of working from home, mean that the uplift in housing units will have a minor impact (4 additional car trips in the AM peak) on the surrounding strategic and local highway networks.
- 18.22. The Phase 1 outline application included a Controlled Parking Zone (CPZ) secured by S106. The CPZ is being maintained as part of the present application and will be secured via the new Section 106 agreement
- 18.23. 21 residential Blue Badge parking bays and 4 non-residential Blue Badge spaces are being provided, in exceedance of London Plan requirements.
- 18.24. Given the practicalities of delivering such a large scheme and to allow for minor amendments during the delivery of the development, it is recommended that the final details of the vehicle parking provision is secured by condition. A Parking Management Plan is required prior to occupation which sets out details of how spaces will be allocated and should be periodically updated to reflect targets in the Travel Plan.
- 18.25. The level of parking provision is suitable to Phase 1b in its location adjacent to Meridian Water rail station and to the larger Meridian Water site as an urban development that is supported by a sustainable transport strategy.

Electric Vehicle Charging

- 18.26. An acceptable number of Electric Vehicle charging points is proposed. 10, 8 and 5 active EV spaces are proposed on Plots B, C and D, respectively. 40, 30 and 20 passive EV spaces are proposed on Plots B, C and D, respectively. This is in line with relevant London Plan policies.

Delivery and Servicing

18.27. The applicant has submitted a Deliveries and Servicing Plan (November 2021) which is largely acceptable. It indicates that delivery and servicing trips will not be significant so are unlikely to have an impact on the highway network.

18.28. Officers continue to have concerns with regard to waste store facilities and the ability of waste lorries to be able to safely and efficiently access waste facilities for collections, particularly on Plots B and D. On Plot B, tracking plans show very tight access into and out of the servicing bay, with potential conflicts with the nearby delivery bay, and distance to columns. Similarly, on Plot D, swept path plans indicate very tight manoeuvring required for a waste lorry to enter the ground floor; there are intervening columns and a shared delivery/refuse bay, which should not be shared. The Plot D waste store itself has little space for arranging bins, there are concerns that a collection would take hours to move the bins out and rearrange them. Given the size of the store, it is expected that a number of collections per week would be required. As part of ground flood amendments to address fire safety compliance, the applicant is making further improvements to the currently proposed waste and lorry access arrangements. These changes should accord with the recommendations by officers below. The applicant is making revisions that will be provided by update to Committee members in advance of the meeting.

- The refuse loading bay should be for this purpose only and not shared with any other use as lorries will be unable to service the building if the bay is occupied
- Swept path analyses are needed to demonstrate waste lorries can manoeuvre in and out; columns nearest lorry manoeuvring areas should be reinforced
- Ventilation, adequate lighting and height clearance, not only for access but for lifting the bins
- Bin sizes for various forms of waste: 1100L for refuse, 1280L for recycling and 140L for food waste
- Internal doors leading out to parking and service areas should have visually permeable glazing to avoid doors swinging into vehicles
- Clear responsibility by estate management to ensure waste services can access loading bay, refuse facilities and that residents are informed of responsible waste practices.

18.29. The applicant has also submitted a Site Waste Management Plan that requires revision. On this basis, a condition is recommended requiring a revised Site Waste Management Plan that is consistent with the above-requested information and a new Circular Economy Statement, also sought by condition. This is discussed in more detail in the Sustainability and Climate Change section.

18.30. In addition, it is proposed that there should be a condition requiring submission of an updated Delivery and Servicing Plan. This is also discussed in more detail in Sustainability and Climate Change section.

Healthy Streets and Active Travel Zone Assessment

18.31. The Transport Assessment includes a detailed Active Travel Zone assessment which highlights opportunities for improving walking and cycling links to key attractors.

- 18.32. Officers are satisfied that the application proposes low parking provision with a highway network that gives priority to pedestrians and cyclists next to the Meridian Water train station. Strategic Infrastructure Works will continue to reinforce sustainable travel within and to Meridian Water. In all, officers are satisfied that the development positively supports Healthy Streets aims.

Travel Plan

- 18.33. A Travel Plan and monitoring fee will be secured via an appropriate planning obligation within the S106 Agreement

Construction Logistics Plan

- 18.34. It is recommended that a final version of the Construction Logistics Plan is agreed prior to commencement of development and a condition is recommended to address this.

19. Sustainability and Climate Change

- 19.1. Paragraph 154 of the NPPF requires new developments to 'be planned for in ways that avoid increased vulnerability to the range of impacts from climate change... and help to reduce greenhouse gas emissions, such as through its location, orientation and design'. The Council's Cabinet declared a state of climate emergency in July 2019 and committed to making the authority carbon neutral by 2030 or sooner. The key themes of the Sustainable Enfield Action Plan relate to energy, regeneration, economy, environment, waste and health. The London Plan and draft Enfield Local Plan each make reference to the need for development to limit its impact on climate change, whilst adapting to the consequences of environmental changes. Furthermore, the London Plan sets out its intention to lead the way in tackling climate change by moving towards a zero-carbon city by 2050.
- 19.2. London Plan Policy SI 2 (Minimising Greenhouse Gas Emissions) sets out the new London Plan's requirements for major development from the perspective of minimising greenhouse gas emissions. For major development, the policy sets out as a starting point, that development should be zero-carbon and it requires, through a specified energy hierarchy, the required approach to justifying a scheme's performance.
- 19.3. London Plan Policy SI 2(C) outlines that new major development should as a minimum, achieve 35% beyond Building Regulations 2013, of which at least 10% should be achieved through energy efficiency measures for residential development. Policy DMD55 and paragraph 9.2.3 of the London Plan advocates that all available roof space should be used for solar photovoltaics.
- 19.4. London Plan Policy SI 4 outlines that major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with a cooling hierarchy.
- 19.5. NPPF Paragraph 157 outlines that LPAs should expect new development to comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable

Minimising Greenhouse Gas Emissions

- 19.6. An Energy & Sustainability Strategy for Planning (December 2021, Revision 3) has been prepared by the Applicant which provides an overview of the energy and sustainability strategies for the proposed development. The document demonstrates how the proposal has sought to meet London Plan requirements inclusive of the energy hierarchy and relevant Council policies.
- 19.7. The assessment outlines that the development will achieve a reduction in energy demand through several efficiency measures that include enhanced building fabric U-Values, thermal bridging, enhanced air tightness, mechanical ventilation with heat recovery in residential units, connection to the Lee Valley Heat Network and efficient lighting. These measures will achieve an overall improvement of 11% over Part L 2013, exceeding the London Plan target of 10%.
- 19.8. The applicant submitted an Overheating Report (July 2022). To address cooling and overheating, the assessment sets out a strategy to meet the cooling hierarchy and mitigate overheating risk using:
 - Openable windows
 - Internal blinds (the installation of which is recommended to be conditioned)
 - Mechanical Ventilation Heat Recovery units with matched tempering modules in Plot D
- 19.9. The development proposes to connect to the Enfield District Heat Network operated by Energetik. The assessment indicates that the connection to the DEN achieves a further 59% reduction in site total CO₂ emissions.
- 19.10. The proposed development will maximise the amount of PV located on roof spaces of the residential elements.
- 19.11. The proposed development achieves a 71% improvement in CO₂ emissions over Part L 2013 through onsite measures and would meet the GLA planning policy target for reduction in regulated CO₂ emissions. London Plan Policy SI 2 stipulates that where a zero-carbon target cannot be fully achieved on site, a carbon off-set contribution is required. A carbon off-set contribution will need to be secured through the S106 Agreement.
- 19.12. In order to ensure that the development is net zero-carbon and built in accordance with the submitted energy strategy, conditions are recommended that the development is constructed in accordance with Energy Statement (November 2021) and that prior to the commencement of development, a technical note is submitted confirming how this development will meet the net zero-carbon policy requirement in line with the Energy Statement, and prior to occupation, an Energy verification report confirming that the development has been built in accordance with the details submitted.
- 19.13. The application additionally includes a Whole Life-cycle Carbon Assessment. London Plan Policy SI2 encourages non-referable applications to prepare an assessment and demonstrate how the development will reduce life-cycle emissions. As many measures rely on detailed design, the submitted assessment sets out principles and assumptions for limiting the development's full carbon impact. A condition is recommended that, prior to commencement of development, a technical report is provided that includes detailed targets, measures and evidences how targets will be achieved.

Circular Economy

London Plan Policy SI 7 promotes circular economy outcomes and net zero-waste in new development. Applications should demonstrate how they will:

- re-use or recycle materials from demolition and remediation works
- reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life
- provide opportunities for managing as much waste as possible on site
- support recycling and re-use
- accord with the waste hierarchy
- monitor and report performance

The application includes a Detailed Circular Economy Statement (October 2021, Revision 1). The document sets our principles and broad commitments, however, does not include any numerical targets or detailed measures for meeting commitments. A condition is recommended that prior to commencement, a new Circular Economy Statement is provided that details how the scheme will comply with London Plan Policy SI 7. Further, prior to occupation, a report is recommended to be submitted evidencing how the commitments in the revised Circular Economy Statement have been satisfied.

Site Waste Management Plan

The NPPF refers to the importance of waste management and resource efficiency as an environmental objective. Policy SI7 of the London Plan encourages waste minimisation and waste prevention through the reuse of materials and using fewer resources whilst noting that applications referable to the Mayor should seek to promote circular economy outcomes and aim to achieve net zero-waste. At a local level, policy CP22 (Delivering Sustainable Waste Management) of the Core Strategy sets out that in all new developments, the Local Planning Authority will seek to encourage the inclusion of re-used and recycled materials and encourage on-site re-use and recycling of construction, demolition and excavation waste.

The application includes a Site Waste Management Plan (November 2021, Revision 2) that broadly sets out construction-stage and operational waste generation, storage and removal. The Site Waste Management Plan should additionally address London Plan Policy SI 7 demonstrating strategies and targets to reduce waste. As above, a condition is recommended that a new Circular Economy Statement is submitted. The Site Waste Management Plan should be consistent in its approach, and reaffirm the measures and metrics in the Circular Economy Statement.

20. Environmental health

Air quality and pollution

- 20.1. Policy SI1 of the London Plan set out the requirements relating to improving air quality. These Policies require Development Proposals to be at least Air Quality Neutral and use design solutions to prevent or minimise increased exposure to existing air pollution. Furthermore, the Policies require developments to consider how they will reduce the detrimental impact to air quality during construction and seek to reduce emissions from the demolition and construction of buildings.

- 20.2. At a national level, the NPPF recognises that development proposals which directly address transport issues and promote sustainable means of travel can have a direct positive benefit on air quality and public health by reducing congestion and emissions.
- 20.3. Finally, at a local level, policy DMD65 of the Development Management Document requires development to have no adverse impact on air quality and states an ambition that improvements should be sought, where possible.
- 20.4. The ES has assessed the likely impacts of the construction and operational phases of the proposed development on local air quality. The dominant source of existing air pollutants (NO₂, PM₁₀ and OM_{2.5}) would most likely be from vehicle emissions from surrounding roads. The impacts from the development include dust and other particulates from construction activities, traffic generated by construction vehicles, and the operational air quality effects of the completed development which are primarily associated with changes in traffic flows.
- 20.5. Without mitigation the ES concludes that the likely construction phase activities of earthworks, construction and vehicles depositing dust outside of the site could be major and adverse. However, once mitigation is provided the impacts would reduce to an acceptable level. This mitigation would include best practice measures built into the construction methodology and implemented through a Construction Environmental Management Plan (CEMP) and / or Dust Management Plan (DMP).
- 20.6. Within the ES operational traffic from the completed development has been identified as the main potential cause of air quality impact locally. The NO₂ concentrations are predicted to be well below the national air quality objective, with the impacts categorised as 'Minor Adverse' at all receptors. For PM₁₀ and PM_{2.5} the predicted impacts have been classified as 'Negligible' at all receptors. Combining the impacts the overall operational impact on air quality has been classified as 'Negligible' at all receptors, and so no specific mitigation has been identified as being necessary.
- 20.7. In response to the ES the Council's Environmental Health Officer has recommended a condition seeking a Construction Environmental Management Plan, and it is suggested that this incorporates the management of dust with reference to the Mayor of London's Supplementary Planning Guidance on *Control of Dust and Emissions During Construction and Demolition*. As Enfield is a Low Emission Zone for non-road mobile machinery a condition would require Non-Road Mobile Machinery (NRMM) to comply with GLA guidance.
- 20.8. Further, a condition is recommended requiring that an investigation and assessment of the extent of contamination is submitted to officers for consideration.

Noise

- 20.9. Chapter 9 of the ES considers noise and vibration. Vibration would be limited to piling at the construction stage, with the recommendation that rotary bored piling offers a better vibration and noise performance. Otherwise vibration is not anticipated to be an issue. The Council's Environmental Health Officer has recommended a condition requiring details of impact piling.

- 20.10. There would be noise caused by traffic during both the construction and operational period. The ES identifies that construction noise and vibration (including road traffic) can be suitably controlled through an appropriate CEMP and adherence to best practices. This would ensure that any impacts are negligible. Operational traffic would generate noise levels that would be negligible.

Wind and microclimate

- 20.11. The applicant has submitted a technical report into the wind microclimate impacts of the proposed development. The wind microclimate can be affected by terrain, buildings and other obstructions. The report combines pedestrian level wind speeds measured experimentally at key areas within and around the site, with long-term wind frequency statistics transposed from the nearest suitable weather station to determine the probability of local wind speeds exceeding comfort and safety thresholds for a range of common pedestrian activities. Wind tunnel tests were used to compute the aerodynamic effect for two scenarios. Scenario 1 is the proposed development within the existing surrounds and Phase 1A of the Meridian Water regeneration. Scenario 2 adds to Scenario 1 by also including any consented schemes in the area. The criteria used to assess the development are based around pedestrian comfort, using the Lawson Criteria (as adapted by the London Docklands Development Corporation). They describe the suitability of specific activities to a threshold of wind speed and frequency.
- 20.12. The results for both Scenario 1 and Scenario 2 show that wind conditions at street level are safe for public use. Within the development itself wind conditions are generally suitable for their intended use. There are 4 discrepancies. One would be a safety breach to one of the balconies, and the other discrepancies are where the wind conditions are potentially not ideal for other balconies. However, this is relatively low with the vast majority of the development meets the criteria.
- 20.13. The report then identifies potential wind mitigation measures for the proposed development. This includes landscaping at street level and within the podium, and recessed entrances at ground floor. It also includes parapets, screens and balustrades. With this mitigation the discrepancies identified above are eliminated: the potential safety breach is removed and the wind conditions become suitable for their intended use.
- 20.14. Overall, the assessment is considered acceptable and the impacts of the development in terms of microclimate are deemed to be acceptable.

21. Flood Risk and Drainage

- 21.1. London Plan Policy SI 12 outlines development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Policy SI 13 outlines that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. It also states there should also be a preference for green over grey features, in line with an outlined drainage hierarchy.
- 21.2. Core Strategy Policies CP21, CP28 and CP29 and Development Management Document Policies DMD59 – DMD63 outline the requirements for major development from the perspective of avoiding and reducing flood-risk, the structure and requirements of Flood Risk Assessments (FRAs) and Drainage

Strategies and maximising the use of Sustainable Urban Drainage Systems (SuDS).

- 21.3. The Site falls mostly within Flood Zones 1 and 2, where there is a low and medium risk of flooding with a small area at the north of the site, nearest Pymmes Brook, in Flood Zone 3.
- 21.4. With respect to flood risk, the applicant has prepared flood models and Flood Risk Assessments (FRAs) which assessed possible sources of flood risk in respect of London Plan Policy SI12 and SI13. The Environment Agency (EA) found the flood models to be “not fit for purpose” and, for this reason, have objected to the application, citing that the Flood Risk Assessment provided in May 2022 is unacceptable, the applicant has not sufficiently addressed issues of contaminated land and the applicant has not demonstrated an acceptable naturalisation of Pymmes Brook. The EA acknowledges that the applicant has since suitably addressed the matter of contaminated land and has removed this objection, although conditions related to contamination are expected to be recommended.
- 21.5. The most recent flood model (submitted August 2022) accounts for the conditions on the site pre-development, that is, absent any of the proposed development. The EA has accepted this model. Further models have been issued to the EA on 5 September, including one that includes the development and some elements of naturalisation to the Pymmes Brook, including mid-channel wall removal and lowering of the southern bank wall and associated mitigation; the other adds further naturalisation features such as gravels on the watercourse bed, shelves along the bank and planting. The EA has completed review of the models that are most pertinent to the proposal and has identified several “Amber” issues. The EA has expressed confidence that these issues can be addressed by the applicant with further work in order to be able to accept the flood models. The applicant also submitted a Flood Risk Assessment (FRA) on the 5 September for review by the EA and LLFA. The EA and LLFA have raised initial comments and points of clarification for the applicant, and are liaising closely with the applicant’s hydrology consultants. Again, the EA expressed confidence that the remaining issues can be resolved by the applicant in order to enable the EA and LLFA to recommend conditional approval. If the EA and LLFA accept the FRA, it is likely that conditions will be recommended, including a condition for further detail of the naturalisation works, and any associated updates to the model and FRA. Officers will provide an update in advance of the meeting of the Planning Committee.
- 21.6. The most recent SuDS Strategy for Meridian Water Phase 1B can be delivered in compliance with DMD Policy 61. The proposed discharge rate is greenfield runoff rate for up to the 1 in 10 year event, thereafter unrestricted runoff is allowed. This is to ensure that the site is able to discharge runoff during the 1 in 100 year (plus climate change) event to the receiving watercourses (the Pymmes Brook) before the river peaks during that flood event, and therefore should not exacerbate flooding downstream. This approach has been applied to the whole of the Phase 1 boundary, and includes Phase 1A and other development zones within the Phase 1 boundary such as the Meanwhile uses.
- 21.7. Through limiting the discharge rate for up to a 1 in 10 year event it was expected that most of the attenuation required for Phase 1B could be provided in above ground features. However, despite the cumulative attenuation in green roofs, rain gardens and permeable paving, some below ground attenuation is still proposed. This is only acceptable where the below ground storage features are providing supplementary storage to above ground features. It has been demonstrated that

some above ground attenuation, particularly in the South Park, will be activated for lower order storm events, with below ground attenuation tanks only being utilised for larger storm events (such as the 1 in 30 year event). This is an acceptable approach. Through detailed design (secured via planning condition), there may be opportunities to reduce the reliance on below ground attenuation further.

- 21.8. Source control SuDS measures are proposed to be maximised through the extensive use of green roof systems for roof runoff, and rain gardens/tree pits and permeable paving for the hardstanding areas. It is envisaged that all landscaped areas within the public realm will be a SuDS feature (such as a tree pit or a rain garden) but with the flexibility of different planting specifications. A swale is being utilised within the Ecological Corridor, which will also enable better drainage from the station platforms.
- 21.9. A condition is recommended seeking further information on the detailed design, including technical details of the drainage strategy and SuDS features (including how they connect), and a management plan for future maintenance. A further condition would require a Verification Report demonstrating that the approved SuDS measures are fully implemented prior to occupation of the development.

22. Socio-economics and Health

Socio-economics

- 22.1. London Plan CG5 seeks to ensure that the benefits of economic success are shared more equally across London and Policy E11 makes clear that development should support employment, skills development, apprenticeships and other education and training opportunities in both the construction and end-use phases.
- 22.2. Core Strategy Policy 13 seeks to protect Enfield's employment offer and Core Policy 16 requires mitigation to help local people improve skills and access jobs. The Council's Planning Obligations SPD (2016) sets out guidance on implementing these policies.
- 22.3. Chapter 10 of the ES provides an assessment of socio-economics and health within a study area around the site (the 'Local Impact Area'), and a wider area including the Boroughs of Enfield and Haringey (the 'Wider Impact Area'). This allows for comparisons to be made with London as a whole, and (for some indicators) nationally.
- 22.4. Within the Local Impact Area, there is a higher proportion of children and young people under the age of 20 when compared to the Wider Impact Area and London as a whole. The same is true for Black and Asian minorities within the Local Impact Area, representing a higher proportion than the Wider Impact Area and London. There are high levels of deprivations within the Local Impact Area, which is similar to the surrounding areas. There is a good amount of provision within the Local Impact Area in terms of social infrastructure.
- 22.5. The ES identifies that the construction phase of the development is expected to result in a moderate beneficial effects in the medium term. The ES also identifies that there is a beneficial impact with regards to housing quality and design, access to education, healthcare services and social infrastructure, access to open space and nature.

- 22.6. To help ensure that Enfield residents are able to take advantage of this beneficial effect of the scheme, it is recommended that the S106 agreement secures employment and skills obligations in accordance with the Council's S106 SPD.

Health Impact Assessment

- 22.7. London Plan Policy GG3 outlines that to improve Londoners' health and reduce health inequalities, those involved in planning and development must adhere to an outlined criteria.
- 22.8. This application is accompanied by a Health Impact Assessment (HIA). The assessment outlines health profile baselines which have informed impacts of the proposed development. The HIA is based on the Healthy Urban Development Unit (HUDU) Rapid HIA Assessment Tool, which is the correct approach. The baseline position has been established in Chapter 10 of the ES in terms of the demographic profile of the local population, provision of social and community infrastructure and socio-economic conditions. This allows for vulnerable or priority groups to be identified. As identified above, there is a higher proportion of children and young people under the age of 20 within the Local Impact Area, which is 31% of the population. This compares to 26% in the Wider Impact Area and 24.7% across London. There is a lower proportion of elderly people in the Local Impact Area (9.4%) compared to the Wider Impact Area (circa 12%). The site is located within an area of deprivation based on the physical and financial accessibility of housing and local services, with a higher proportion of people on low incomes than most areas.
- 22.9. The HUDU Rapid HIA Assessment Tool provides 11 determinants of health:
- Housing design and affordability
 - Access to health and social care services and other social infrastructure
 - Access to open space and nature
 - Air quality, noise and neighbourhood amenity.
 - Accessibility and active travel
 - Crime reduction and community safety
 - Access to healthy food
 - Access to work and training
 - Social cohesion and inclusive design
 - Minimising the use of resources
 - Climate change
- 22.10. Within each, there are a number of criteria against which the proposed development is assessed. Overall, the assessment concludes that the proposed development will generally have a positive impact on the health of the future and local residents. Securing the employment benefits is discussed above. A Construction Management Plan, Construction Logistics Plan and Travel Plan would ensure that air, noise, and dust is managed during the construction phase. During the operational phase of the development the residential, commercial, leisure and medical floorspace proposed, as well as the associated open space will contribute to the wider regeneration of Meridian Water and deliver positive health benefits.
- 22.11. As recommended by policy, the Healthy Streets approach has been utilised to inform the Transport Assessment and shape the manner in which the design development of the scheme has come forward. Landscaping and public realm

improvements that this scheme will deliver, as well as the promotion of more sustainable forms of transport through the introduction of cycle parking to the site, cumulatively, in officers' view, result in benefits to both existing residents of the estate, and future occupiers of homes proposed.

- 22.12. The outcomes set out within the Health Impact Assessment aim to demonstrate that the proposed development has incorporated a number of measures into the design to ensure its impact on health is as positive as possible throughout both the construction and operational phases. Officers agree with the conclusions set out, and for reasons set out within this report, are of the view that the development takes steps to address Policy GG3's outlined criteria.

23. Equalities Impact Assessment

- 23.1. In accordance with the Public Sector Equalities Duty, an equalities impact assessment has been undertaken. It is considered the proposal would not disadvantage people who share one of the different nine protected characteristics as defined by the Equality Act 2010 compared to those who do not have those characteristics.

24. S106 Heads of Terms

- 24.1. The applicant has raised viability challenges associated with delivery of the development in light of rising construction costs and associated market conditions. London Plan Policy H5 requires that major applications following the Fast Track Route of the threshold approach (i.e. delivering 50% affordable housing on public sector land, as proposed for this development) that do not meet all obligations will be required to follow the Viability Tested Route. The schemes are to be assessed at stages, including at least early stage and late stage reviews.
- 24.2. The applicant has recently provided a full viability appraisal, which has been independently reviewed. The appraisal confirms that with the delivery of 50% affordable housing, the scheme is in deficit. Notwithstanding this, the applicant has indicated a willingness to make S106 contributions but has not yet made a complete proposal. An update will be provided on this before the meeting. Accordingly, at this stage the full benefits of the proposal are not presently known. However, the applicant has confirmed that the full Off-Site Open Space Enhancement and Maintenance Contribution (which includes monies towards Suitable Alternative Natural Greenspace mitigations) and Habitats Regulations Strategic Access Management and Monitoring Plan payments will be made in full, as set out in the table in Section 24 of this report.
- 24.3. A Section 106 agreement linked to the existing Phase 1 outline permission sets out obligations to be met for the entirety of the consented Phase 1 development but broken down to reflect the Phases 1A and 1B, were the development to come forward pursuant to the outline planning permission i.e for 725 dwellings and delivering 25% affordable housing across the whole of Phase 1. The obligations relating to Phase 1A (approved as reserved matters for the first 300 units) are secured and these are identified in the table below (Column 3). Column 4 identifies those obligations that fall to Phase 1b under the existing outline planning permission assuming it provided 425 residential units with 25% affordable housing across Phases 1A and 1B. The last column (Column 5) sets out the obligations that would be sought to support the uplift in residential units and the development proposed through this application, if viability allows.

24.4. Officers will update on the viability position and the agreed Heads of Terms at the meeting.

Heads of Terms	Description	Existing S106 Agreement applicable to Phase 1a (300 units)	Existing S106 Agreement applicable to Phase 1B (425 unit scheme)	This application
Affordable Housing	Overall quantity, tenure and size mix, early stage viability	25%	25% ✓	50% ✓
Transport	Additional bus stops on Leaside Road			✓
	Vehicle management strategy	✓	✓	✓
	Travel Plan	✓	✓	✓
	Travel Plan monitoring	✓	✓	✓
	CPZ	£70,000		
	Car club	✓	✓	✓
	Unrestricted access across the site and to the station			✓
	Sustainable transport	✓	✓	✓
Education	Contribution towards education provision.	£760,500	£1,077,375	✓
Climate change, flooding and environment	Carbon Offset Payment towards the Carbon Offset Fund	If not connected to DEN	If not connected to DEN	✓
	Connection to Energetik district heat network.	✓	✓	✓
	Monitoring ('Be Seen' – GLA Energy Monitoring Portal).			✓
Health	Plot B health space	✓	✓	✓
Public Realm, Public Art and Cultural Facilities	Estate Management Plan	✓	✓	✓
	Space supporting estate management			✓
Employment & Skills	Employment and Skills Strategy	✓	✓	✓
Green Infrastructure, Open Space and Recreation		£620,689.66	£879,310.35	✓
	SAMM contribution			£9,478
	Off-Site Open Space Enhancement and Maintenance Contribution and SANG contributions			£521,379
	On site open space management plan	✓	✓	✓
	Ecological corridor and monitoring reports	✓	✓	✓
Design	Retention of project architect.			✓
	Design monitoring costs.			✓

25. Community Infrastructure Levy (CIL)

- 25.1. Both Enfield CIL and the Mayor of London CIL (MCIL) would be payable on this scheme to support the development of appropriate infrastructure.
- 25.2. The amount of MCIL owed is £2,727,294. The amount of Enfield CIL owed is £180,560. The Meridian Water Masterplan area is charged at a nil rate for residential development, therefore the residential floorspace incurs £0 in Enfield CIL. Non-residential and commercial floorspace is charged at the standard borough-wide rate. A formal determination of the CIL liability would be made when a Liability Notice is issued should this application be approved.

26. Conclusion

- 26.1. The application proposes the delivery of Phase 1b of Meridian Water in a way that further contributes to the borough's housing supply and provides a proportion of 50% of affordable housing across all of Phase 1. The proposal exceeds LBE's adopted affordable housing target of 40% and meets the London Plan's target of 50%.
- 26.2. There is a pressing need for housing, including affordable housing, and Enfield has a challenging 10-year housing delivery target. This application proposes 676 new, high-quality homes of which 218 are affordable. Enfield's inability to meet the housing delivery test has resulted in the borough's inclusion in the "presumption in favour of sustainable development" category and having to take decisions in consideration of the "tilted balance". This means that permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the NPPF and Development Plan.
- 26.3. The applicant has engaged with the LPA in undertaking extensive pre-application engagement, inclusive of the development being presented to the Enfield Place and Design Quality Panel. The pre-application process involved the applicant considering design options to determine the most appropriate forms of development and the scheme proposed has followed a design-led approach to site optimisation, as per London Plan Policy D3.
- 26.4. The scheme delivers substantial benefits on site for both new residents of Phase 1 as well as surrounding Edmonton communities. The landscaping strategy introduces three new major public open spaces that range from a biodiverse retreat to a civic square to an adaptable open lawn. An ecological corridor links into Pymmes Wood at the north. The streets and public realm are designed to prioritise walking and cycling, and making easy connection to the Meridian Water station. Ground floor spaces are arranged to bring vitality to the development, and a medical space is provided to support a healthy community.
- 26.5. Three areas of consideration remain: flood risk of the proposed development linked to the naturalisation of Pymmes Brook, the viability of the scheme to provide monetary contributions to off site facilities and waste arrangements to allow practicable access and servicing. Further information in respect of these matters will be reported to committee members. While the full assessment of the planning balance must consider these outstanding issues, officers have undertaken rigorous review of the proposal and acknowledge that the application includes public benefit and represents sustainable development as presented.

- 26.6. Subject to further information regarding the outstanding matters, the appropriate mitigations as set out within the recommended condition schedules, and subject to further assessment of obligations to be secured in the Section 106 Agreement, the application is recommended for approval.

Open Space Areas

Meridian Water has a number of open spaces across the development which sit between buildings, streets and areas not available for development or landscape, namely the PRS and meanwhile plots.

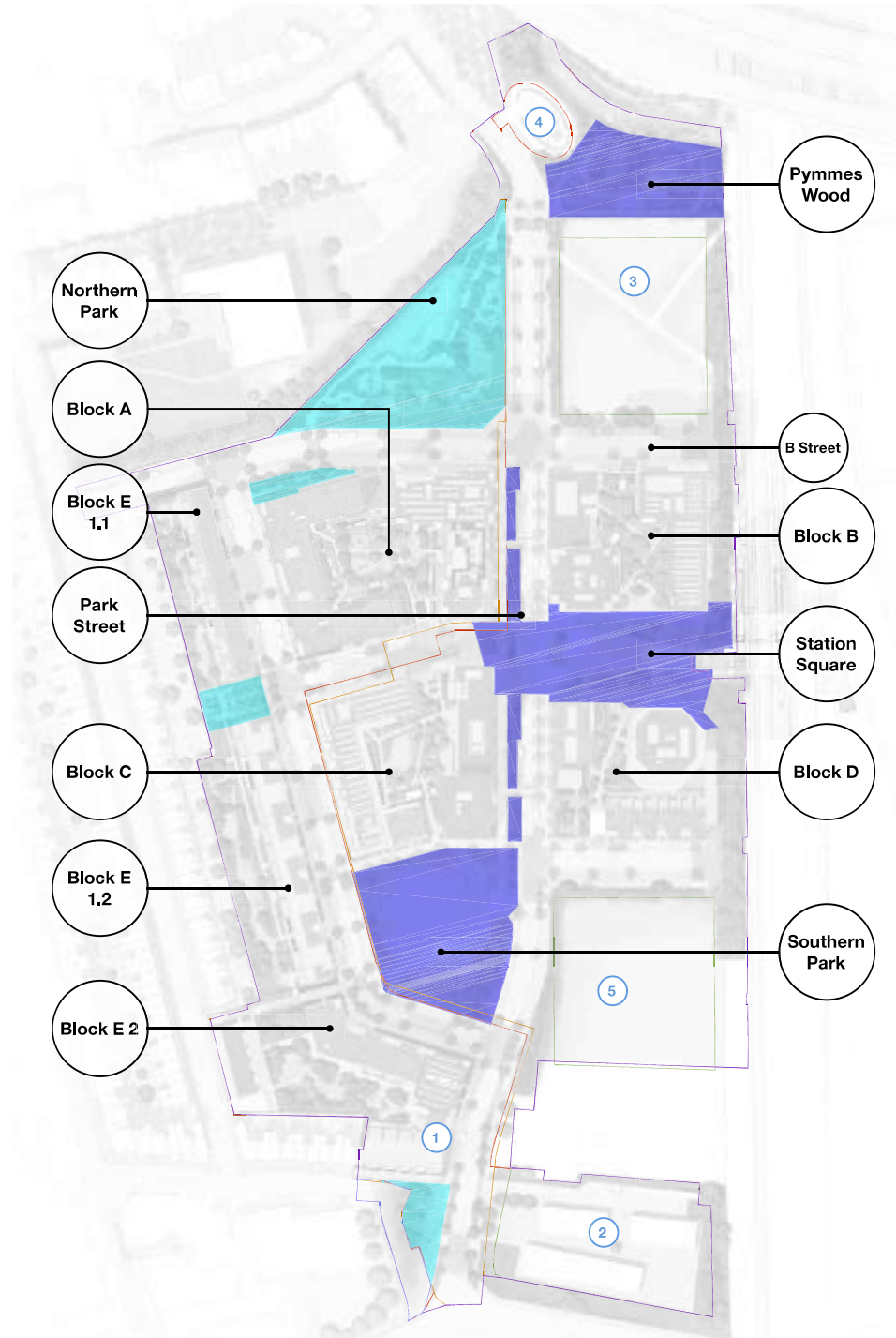
Plan location notes:

1. Phase 1A reserved matters application, consented in 2021
 2. The Meridian Skills Academy, consented 2021
 3. The Northern Meanwhile Plot Community Garden, submitted in 2021
- Further future applications will come forward for:
4. The Pressure Release Station
 5. The central meanwhile plot, whose use is undetermined

The following site areas and POS measurements provide a clear illustration of the quantum of open space public amenity provided as part of the development.

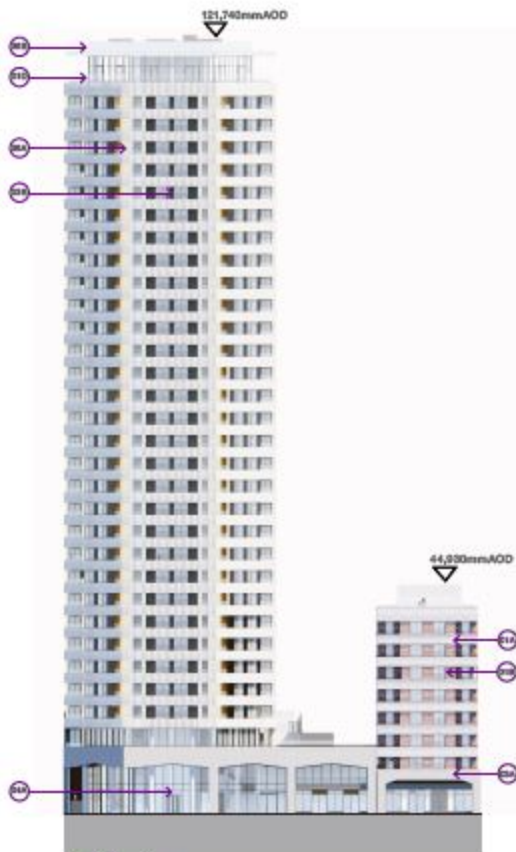
Area	Measurement M ²
Meridian 1	71335
Phase 1A	27259
Phase 1B	39829
Meanwhile north	3634
Meanwhile central	3810
Meanwhile south	3493
PRS enclosure	532
1B Net	31853
1A POS	4554
1B POS	8344
Total POS	12899

The total area of public open space is 1,29ha

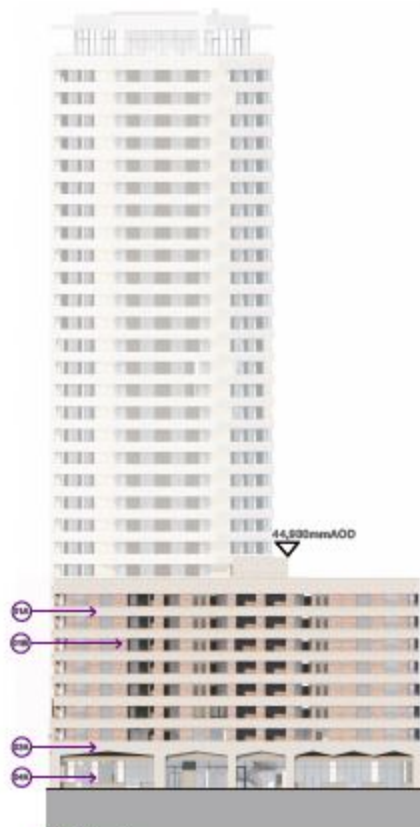








North Elevation



West Elevation

4. Pymmes Wood Character and Fabric

This concept image shows the composition of meadow, wetland, woodland and naturalised brook and the distribution of habitats.



Lawn areas with meadow edge



Habitat boxes nestled in planted margins



Native wet/damp woodland planting and understory



Footpath surfacing



Habitat features throughout



Floating reed beds



4 The proposed scheme - Phase 1B proposals

4.12 Station Square View



3. Southern Park
Southern Aerial View

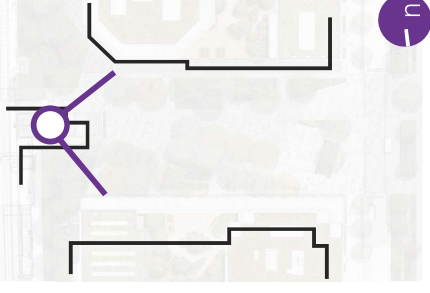


1. Station Square

View from the Steps

When alighting at Meridian Water the station square will be the first experience of the new character and place. The experience is of arriving into an open and flexible but green and soft space with plants, trees, materials and furniture all reflecting the Lea Valley character. The station steps land into a clearing with spaces beneath trees off to the sides. Clear stem trees allow views to the B and D ground floors and across the square

1. Clearing at base of steps
2. Seating space and clear route to block D main entrance
3. Informal seating and programmable space
4. Wild planting and swale feature connecting to ecological corridor
5. Seating outside Block D
6. Water feature forms focus of view from station steps
7. Clear views out to park street





Meridian Water Phase 1 Masterplan