

**Written Statement**  
**Matter 6 - Better Homes Enfield**

**Policy PL5 – Meridian Water and Allocations SA5.1 – SA5.8**

**Q6.26 b) Is Figure 3.6 accurate and legible? Are there any requirements identified on Figure 3.6 that are not set out in the policy's text?**

1. Figure 3.6 is not legible and is consequently unusable.
2. It does not accurately identify
  - a. safeguarded waste sites listed in the North London Waste Plan (Adopted 2022) i.e. EN30, EN25, EN7, EN15 and EN11.
  - b. Riverside Square East and Meridian Plaza squares, which form part of SA5.6 (p.412 and p.519).
  - c. A public square on SA5.7 (p.520), which is not shown on Figure 3.6.
  - d. The Northern Conveyance Channel, Broad Band, Northern Band or clearly identify existing and proposed bridges.
3. We could not locate Table PL05.
4. The walking route on Figure 3.6 meets Edmonton Marshes in the middle, whereas it meets at the southern tip on the map accompanying SA5.6. Which is correct?

**c) Is all development in the Meridian Water area expected to comply with all aspects of Policy PL5? If so, is this justified?**

5. As worded, it would appear so, but this is neither justified nor effective e.g. requirement 1 says development proposals in Meridian Water “*must deliver comprehensive, residential led mixed-use development that optimises the site's potential*”, yet not all allocations meet this description e.g. SA5.8.

**d) In relation to criterion 1, would the Council be responsible for preparing the masterplan referred to?**

6. Yes, the Council already has a Masterplan but has not published it for consultation, contrary to their SCI. Should applications not commence until the new masterplan is adopted?
7. Site Allocation Design Principles reference the Meridian Water SPD e.g. SA5.2(N) and SA5.3(D and G) and there are several other requirements that can only be understood with reference to the SPD e.g. Lee Navigation Linear Open Space, Market Square, Riverside Square, The Broad Band etc. It is unclear from PL5 whether the masterplan would supersede the SPD, or what the status of the SPD is.
8. There are inconsistencies between the SPD and Site Allocation information e.g. SA5.2 [II] says “*should contribute towards the North Flood Conveyance Channel (NFCC)*” but the SPD says this is funded by the Housing Infrastructure Fund.

**g) Is the specific requirement for open public space in criterion 7 justified and consistent with other policies on open space provision? What would acceptable justification be for not delivering the requirement?**

9. No, it is not justified or consistent with other policies. Please see our representation **01708-24-1, p.4-8, points 20-36.**
10. Furthermore, in addition to the issues detailed in our representation:
11. PL10 says “*should deliver new open spaces on either side of the North Circular Road (A406) ...*” but it is unclear what new open spaces north of the A406 are envisaged.
12. It is not clear who would be responsible for managing and maintaining new open spaces and public squares. Maintaining open spaces to a high standard seems particularly important if the quantum area of open spaces is below the level normally required. PL10 Chase Park includes a requirement for proposals to set out long term governance and stewardship arrangements [ELP, PL5, p.98, requirement 17], why are these not required for PL5 and SA5.1-SA5.8?

**h) Under criterion 18, is the 25% local labour requirement justified and how would this be controlled?**

13. Please see our representation **01708-24-1, p.8, points 41-42.**

**Q6.29a) The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?**

Overall

14. To answer this, we first need to establish the scale of development proposed overall and the contribution of each Site Allocation (SA), which is unclear.
15. ELP 3.68 [p.67] says the aim is to deliver 10,000 homes and 6,000 permanent jobs. However, ELP 3.75 [p. 68] suggest 6,711 homes are to be delivered in the plan period, but neither the ELP PL5 nor the relevant Site Allocations state the number of permanent jobs delivered, or the type of jobs. The approximate estimated housing capacity across the site allocations accounts for 6,445 homes within the plan period; only SA5.6 makes any allowance for homes delivered beyond 2041 (1,280 outside the plan period). The total sum of SA therefore is 7,725, not 10,000. As a result, the amount of development and its density for homes and employment cannot be justified, because the amount proposed is unclear. Given this, it is difficult to properly assess the scale and density of development overall or within site allocations, and to adequately establish whether the infrastructure proposed is sufficient.
16. The Council's cross-party Meridian Water Scrutiny Workstream reviewed the proposed population density of the development based on 10,000 homes and found it would be *"3-5 times more densely populated than neighbouring wards or indeed other town areas of Enfield"* and that Meridian Water *"will be one of the most densely populated area in London, even when compared to central London areas"* (Table 3 from the

report is provided below).

**Table 3: Population density compared to 624 wards in London (most dense based of this methodology)**

| <b>Borough</b>  | <b>Ward Name</b>  | <b>Population</b> | <b>Hectares</b> | <b>Population per hectare</b> |
|-----------------|-------------------|-------------------|-----------------|-------------------------------|
| Enfield         | Meridian Water    | 26,406            | 85              | 310.66                        |
| Westminster     | Church Street     | 13,253            | 44.4            | 298.49                        |
| Westminster     | Harrow Road       | 13,741            | 49.5            | 277.60                        |
| Westminster     | Lancaster Gate    | 15,166            | 63              | 240.73                        |
| Westminster     | Queen's Park      | 13,914            | 58.3            | 238.66                        |
| Newham          | Green Street East | 17,576            | 74.3            | 236.55                        |
| Kens. & Chelsea | Earl's Court      | 10,503            | 45.9            | 228.82                        |
| Westminster     | Bayswater         | 11,660            | 51.8            | 225.10                        |
| Tower Hamlets   | Whitechapel       | 20,393            | 91.8            | 222.15                        |
| Hackney         | Hoxton            | 18,426            | 83.9            | 219.62                        |

17. The Workstream questioned whether Meridian Water could realistically support such high population densities over 85 hectares in outer London. They noted other areas with similar densities have superior infrastructure associated with central London (e.g. public transport, major parks etc.), cultural benefits (e.g. access to theatre, cinema, museums etc.) and employment opportunities.
18. The Workstream reported the Scenario Testing, which underpins the Council's approach to Meridian Water, had noted that the housing and population density proposed is unusually high for a development of this scale, and that building 10,000 homes requires significant compromises; notably that the scale and massing needed would result in frequent failure to meet daylight or amenity light standards and that 10,000 homes could not be delivered within a policy compliant framework.
19. The 50-page Workstream report (June 2020) identified multiple evidence-based issues. The Workstream was told their concerns would be addressed in an updated Masterplan which would be published shortly. However, the Masterplan has never been published and the concerns raised by the Workstream were not addressed.
20. We note the unpublished Meridian Water Vision/masterplan document forecasts far higher densities than are suggested in the Site Allocations based on the size of the site and the number of homes proposed e.g. the Vision forecasts density of 276 dph at

SA5.1 whilst the Site Allocation allows for 136 dph. Our view is that the Vision provides a more accurate representation of the Council's ambitions.

21. The lack of clarity about the scale and density of Meridian Water is repeated in the Transport Assessment which says there are plans for 5,000 homes at Meridian Water, which is significantly lower than the scale of development proposed [TRA4, PDF p.37].
22. Also, MoTiON Results were, based on 2,681 dwellings and 16,325 jobs (motion zone 654), not the number of homes proposed [TRA4, PDF, p.91].
23. There appear to be a lot of inconsistencies in the Transport Modelling inputs, leading to concerns about the reliability of its conclusions e.g.
  - a. Table 7 says Meridian Water is in Motion zone 1198, but it is in 654, so it is unclear whether this was assessed correctly [TRA4, p.80].
  - b. Table 13 specifies Motion zone 654 will have 3,277 dwellings and 3,195 workers, which does not reflect the full development [TRA4, PDF p.39].
  - c. Table 18 shows car ownership in the motion zone increasing by 3,179 cars [TRA4, PDF, p.49].
  - d. However, Table 24 indicates there will be no change in parking supply [TRA4, PDF, p.57].
  - e. Table 13 says car ownership will = **0.198** per household, and hence 3,277 homes will generate 648 cars [TRA4, PDF p.39].
  - f. Table 21 suggests there will be an additional 1,136 people employed across motion zone 654, nowhere near the 6,000 claimed in the ELP or the figure quoted in the MoTiON Results [TRA4, PDF p.53].
  - g. Table 30 suggests there will be just 358 employees and zero primary school enrolments at motion zone 654 at 2041, which does not reflect proposals for PL5 [TRA4, PDF p.64].

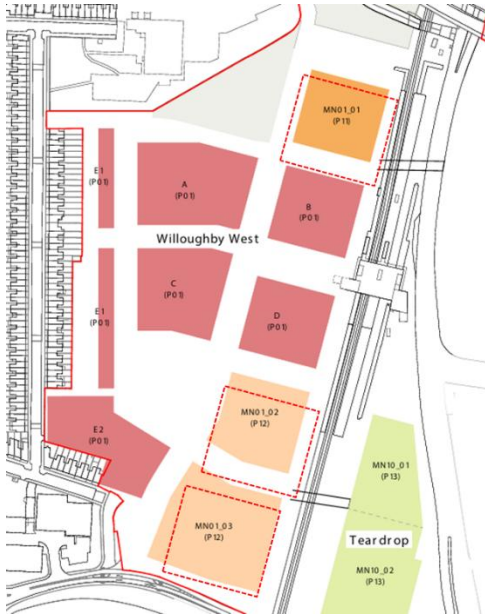
24. Therefore, the Transport Assessment for PL5 would seem to be incorrect and inconsistent within itself and not reflective of the scale of the proposed development in terms of dwellings or employment spaces. As a result, the potential impacts of the proposed development of PL5 and each SA have not been robustly identified and the allocations are therefore not justified, and as a result the plan is unsound.
25. Properly assessing transport issues for PL5 is critical to its successful delivery, yet it is unclear what impact the various scale of development proposals would have. For example, the introduction of new road bridges and the central spine will connect Glover Drive and the A1055 with Harbet Road to the east, which risks opening a shortcut between the A406 and the A1055, the potential impact of this does not appear to have been considered. This is of particular concern as increased capacity along Harbet Road, particularly of HGVs, will affect safe and easy access to the newly proposed park at Edmonton Marshes.
26. A major concern is the proposed approach to car parking across PL5 and the individual Site Allocations, particularly as large areas of PL5 have low PTAL ratings.
27. PL5 is currently PTAL 0 to 2. A range of improvements, most notably additional bus services, will increase PTAL in some areas to 3 (moderate). The Transport Assessment used an input figure of 0.198 car parking spaces per household, which does not reflect what is already approved for sites nearest the station e.g. 1a = 0.4 car parking spaces per household and Phase 2 = 0.25. It is unlikely that other sites will provide a lower parking ratio as they are located further from the station. In short, the infrastructure requirements for car parking, and therefore the impacts of vehicles, do not appear to have been properly understood or accounted for.
28. There are inadequate policy hooks to ensure car parking is kept to 0.198 or below. Furthermore, there are no policy requirements at all for PL5 or the SA regarding car parking management strategies e.g. the introduction of CPZ both within the site and extending CPZ hours outside it, or traffic calming measures. Without these types of policies in place there is a risk of a development of this scale in this location becoming car dominated.
29. Furthermore, there are no robust policies to effectively limit car parking for employment spaces across PL5. Without these the scheme risks becoming car

dominated, particularly given the scale, type and density of the employment spaces proposed.

30. That said, there is also a lack of evidence to shows the scale of office space proposed across the SAs is justified and that employers would consider relocating to this area of outer London without a sufficient quantum of car parking.
31. All these issues will impact the uptake of safe active travel. Please see our representation which set out our concerns regarding active travel [**01708-24-1, p.7-8, points 30-36**].
32. Delivery timings for site allocations are not deliverable as we are already entering years 5-10 of the plan period.
33. None of the allocations incorporate Edmonton Marshes or Kennighall Open Space – and they do not have their own allocation - despite them being within the PL5 area. This raises doubts as to the plans for these open sites and the delivery and management of the limited green infrastructure.
34. Neither PL5 nor the allocations set out basic requirements for the public open spaces and public squares required (Lee Navigation Linear Open Space, Brooks Park, Riverside Square etc.), e.g. minimum sizes, management, and maintenance.

SA1.1 (Phase 1).

35. The quantum of “Approximate Estimated Non-residential capacity (Class E)” is missing.
36. SA1.1 has not accounted for Parcels 11 and 12 (see figure below – red dotted lines show missing parcels).



37. The authority’s ambitions for these missing parcels are well evidenced e.g. the Meridian Water Financial Strategy (adopted April 2023) allocates 761 homes to these parcels. The Council’s Phasing Strategy showed these missing sites coming forward before Meridian 13 and before completion of Phase 2. The Masterplan Vision also shows these sites as being delivered by 2041 (see below)

**7.3 Meridian Water Masterplan Completion**  
Phasing year 2041

- 20 East Bank Completion
- 29 The Broad Band, Rivermead Yards
- 30 The Green Loop, completed
- 31 Market Place
- 32 Meridian Plaza
- 33 Angel Works
- 34 School East Bank, completed
- 35 Prologis, North Band



Fig 74 Masterplan completion, Spatial Vision



38. These plots also appear as developed in the Character of Growth Study, Appendix 11 Meridian Water (2024), which, according to the study is based on ‘... *a well-developed masterplan which has helped inform the approach to height in this area*’ [DES 41, p.2].
39. Therefore, SA1.1 does not currently meet the requirements of the NPPF Chapter 11 (e.g. NPPF 123 and 124(d)) and does not therefore meet the test of soundness required by NPPF 35(d) as it is not consistent with national policy.
40. Infrastructure Requirement (I) – where is the “*footpath widening*” identified in the placemaking policy or IDP? (IV) is, we think, ineffective as the Heat Network does not provide cooling. (V) - What are “... *environmental* *public realm improvements*,” which must be delivered? How will the ‘environmental’ element be judged? Why are similar ‘environmental’ requirements not included for other allocations within PL5?

#### SA1.2 (Phase 2)

41. Please see our representation 01708-20-1 and further issues below:
42. The ‘Approximate Estimated Non-residential capacity (Class E)’ of 13,200 sqm is not consistent with the ‘Land Use Requirements’, which suggest a much higher capacity of Class E uses. The amount of office space proposed is not justified in this location.
43. There are no policies related to parking for non-residential use, risking high rates of car use.
44. There is no clear requirement regarding the size, maintenance, and management of open spaces (Lee Navigation Linear Open Space, Brooks Park, Riverside Square).
45. Infrastructure Requirement [III] - the SPD says the “North Flood Conveyance Channel (NFCC)” will be paid by HIF not developer contributions as stated in the allocation. Which has priority?
46. Design Principle (F) - the school is not required within SA1.2, so how can school playing fields be used for mitigation?

#### SA5.3 - Ikea

47. Please see 01708-20-1.

48. The 'Approximate Estimated Non-residential capacity (Class E)' of 13,200 sqm is not consistent with the 'Land Use Requirements', which suggest a much higher capacity of Class E uses. The amount of office space proposed is not justified in this location.
49. Design Principle [P] - What quantum of industrial/ logistics use in Sqm is expected in the Northern Band and how is this accounted for in the Plan's overall delivery of employment land?

#### SA5.4 - Tesco

50. Tesco have not responded about this site and there seems to be a lack of recent confirmation about when it may come forward. This site is central to the delivery of the PL5 vision - what will happen if Tesco do not bring the site forward?
51. B.S. Pension Fund Trustee Limited (the "B.S. Pension Fund"), owns a long lease of the Tesco Site (title number AGL238880 at Land Registry), yet their intentions are unknown.
52. Land use requirements - What quantum of industrial/ logistics use in Sqm is expected and how is this accounted for in the Plan's overall delivery of employment land? The requirement for 7,000 sqm of offices is not evidence based and therefore unjustified.
53. "Re-provision of existing non-residential uses" is required [p.405] but it is unclear whether this includes both the store and petrol station? Furthermore, the store is a Tesco Extra (i.e. very large), opens 18 hours a day and requires 24-hour access for servicing and delivery requirements and substantial car parking – to what extent does this need to be "re-provided"? The petrol station operates 24/7 and naturally attracts significant traffic – as does the store - is this compatible with the vision for PL5 and how is it accounted for in the transport modelling and layout? To what extent will the local jobs the store currently provides be protected / accounted for?

#### SA 5.5 - M13

54. Approximate Estimated Housing Capacity is incorrect as far more homes are planned for this allocation. Please see our representation **01708-22-1**.

SA5.6 – Meridian East

- 55. Please see our representation **01708-24-1, p3-4, point 19**, and **01708 -20-12-1**.
- 56. Figure 17.1 [**p. 360**] is not, in our view, consistent with the requirements of the SA5.6 [**p.412**], because the whole of SA5.6 is not 'Housing and Mixed Use'.
- 57. The map [**p. 412**] does not show safeguarded waste site sites and these are not mentioned in the design policies. Why not?
- 58. The map suggests two public squares, but these are not in the Design Requirements, and one appears located in the middle of Harbet Road.
- 59. What is the 'Park Link Route'?

SA5.7 Ravenside Retail Park

- 60. Are existing businesses and jobs to be retained where possible?
- 61. When will this allocation be delivered? This is essential to understand and the delivery of PL5 as it needs to be delivered before SA5.6, to free up SIL.
- 62. The Design Principles do not seem realistic and are unjustified. Can the necessary routes and needs of the envisaged businesses be accommodated if the other design elements are met and vice versa?
- 63. Point 'L - how is 'limited parking' to be interpreted in decision-making?

SA 5.8: Kenninghall Metals and Waste

- 64. Land Use Requirements require NET additional floorspace, but this is contrary to Table 9.4 [**ELP p. 276**].
- 65. Approximate Estimated Industrial capacity is blank.
- 66. Why are there no car parking restrictions?
- 67. If 'B' (intensified employment floorspace on upper floors) is required why does Table 9.1 [**ELP, p254**], Table 9.4 [**p.276**] or the Table on **p.278** not show any uplift in sqm?

**Word count: 2,918**