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## **Response to LBE Local Plan Consultation (main issues and preferred approaches June 2021) from M4CH (Meridian for Council Homes)**

*This response is about the Meridian Water (PL5) section of the Local Plan. However, on a general note, the LBE consultation document is not friendly to most local people, needing 14 pages of glossary and “acronym buster” and being 400 pages long.*

### **1. Social Rent Housing**

“The Council as the majority landowner” (3.5.7) seems set on never mentioning social rent housing and MW in the same paragraph. (Social rent housing features in the glossary, although not in the section “affordable housing”). Although “affordable housing” has morphed into “genuinely affordable housing” in *this* Council document, there is still no reference to social rent housing at Meridian Water, which is the only way of fulfilling the Council’s statutory duty to provide housing for unintentionally homeless households, and solve Enfield’s housing crisis, without continuing to be overly reliant on very expensive and unsuitable temporary accommodation.

It is particularly unacceptable that Council owned land would be used for producing “build to rent” (BTR) properties. The glossary definition (page 392) given of this term (build to rent) is not clear and the term “buy to let” is not used. Local residents already struggle to pay even the lowest rates in the private rented sector and face eviction – a major contributor to homelessness in the borough. These BTR properties will probably be unaffordable to local people and will not reflect local housing need. Furthermore, many households living in these BTR schemes will need to claim housing benefit to pay their rent, which will be payable to the scheme owners. M4CH understands the council is considering a range of overseas investors as owners of the BTR schemes. This means overseas investors will be the main beneficiaries of Edmonton residents’ housing benefit payments.

There are also no restrictions on the types of “affordable” housing that will be built at Meridian Water. This means a very high proportion of the so called “genuinely affordable” homes may be shared ownership, which is often more expensive than open market alternatives; and is not affordable to the very large majority of local people and key workers, as it requires household incomes of at least £58k for a two-bedroom flat, as well as a sizeable amount of savings to cover the deposit and legal fees.

**Solution:** Labour run Enfield Council should build and own far more **social rent housing**, including at MW and especially on **Council owned land**. Providing council housing at social rent for the homeless residents of Enfield will solve the housing crisis which is particularly acute in Enfield. If BTR schemes are essential to the short-term financing of the redevelopment, then **these should remain in council ownership**, so that the income generated can be used to fund additional social rent housing, and so that **rental rates can be set to reflect local incomes** of key workers (eg set at London Living Rent levels.)

### **2. Tall buildings**

Tall buildings (3.5.9. and 3.5.10) are proposed for the MW site and were included in architects’ models at earlier planning phases. They are also proposed elsewhere in this Local Plan, including Southbury, Angel Edmonton and Enfield Town. This is inappropriate for several reasons:

<!--[if !supportLists]-->(i) <!--[endif]-->Housing needed in the borough is mainly for 2+ bed homes for families. High rise buildings are not appropriate for family life with children: buggies, lift breakdown, separation from play space and the outdoor environment

<!--[if !supportLists]-->(ii) <!--[endif]-->Above the 7th floor, regular mortgages are

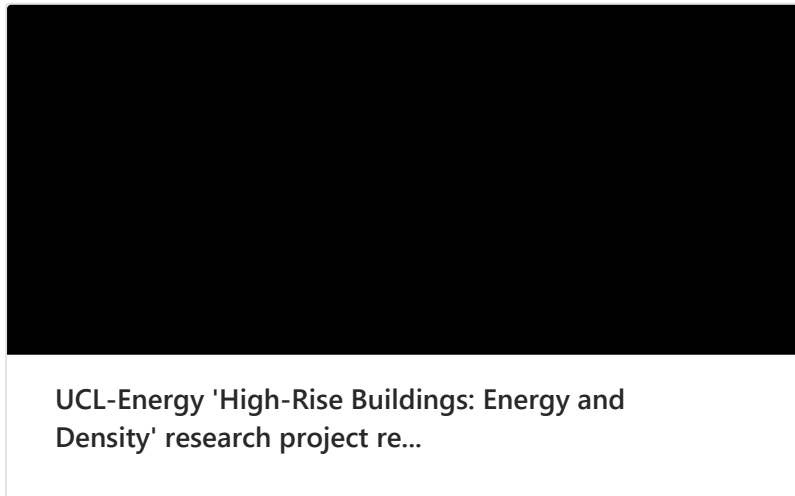
generally unavailable (<https://www.which.co.uk/news/2019/02/revealed-16-homes-to-avoid-if-you-want-to-get-a-mortgage/>) so that purchasers will not be local people who need housing but buy-to-let investors.

<!--[if !supportLists]-->(iii) <!--[endif]-->Vertical streets have been shown now, for decades, not to work in creating cohesive communities.

<!--[if !supportLists]-->(iv) <!--[endif]-->The unspecified danger of flooding has not been sufficiently analysed. Thus, foundations, basements and lower floors affected by floods may put in danger water supply, sewers, electrical connections and other services. With lifts not working, those at the top of tall buildings will be hard to rescue: the water equivalent of fire in Grenfell Tower,

<!--[if !supportLists]-->(v) <!--[endif]-->Can the council guarantee that poor building standards will not create another Grenfell Tower?

<!--[if !supportLists]-->(vi) <!--[endif]-->Tall tower blocks have repeatedly been shown to be less environmentally sustainable than other forms of high-density housing. For example, research from UCL shows that it is possible to provide the same floor area on the same site as high-rise buildings, but on a much-reduced number of storeys; and that high-rise buildings are more energy intensive. (REF: [UCL-Energy 'High-Rise Buildings: Energy and Density' research project results | UCL Energy Institute - UCL – University College London](https://www.ucl.ac.uk/bartlett/energy/news/2017/jun/ucl-energy-high-rise-buildings-energy-and-density-research-project-results) <https://www.ucl.ac.uk/bartlett/energy/news/2017/jun/ucl-energy-high-rise-buildings-energy-and-density-research-project-results> )



<!--[if !supportLists]-->(vii) <!--[endif]-->There is also mounting evidence that tower blocks deliver less affordable housing than other types of high-density housing, due to the very high costs of building and servicing tall buildings.

<!--[if !supportLists]-->(viii) <!--[endif]-->The Council persists in claiming MW will provide 10,000 homes, even though the Planning Inspector has said this is unrealistic.

**Solution:** planning for **fewer homes at MW** and **uniform standards** enforced by the Council from all developers for all buildings. More appropriate and more sustainable housing can be delivered by avoiding tower blocks.

### **3. Building Standards**

“Meridian Water offers huge opportunities for ... the **highest standards** in place making.” (Enfield local plan 3.5.5., M4CH italics). While homes, before being constructed, are already designated

“private”, “market”, “build to let”, “affordable”, “genuinely affordable” etc, there is a serious question mark over building standards: that homes specifically built for these differential outcomes are not all constructed to the same standard. Experience confirms this doubt.

**Solution:** **building standards are uniformly required** by the Council of all developers, including on Council owned land (3.5.7) regardless of intended usage.

#### **4. Flooding**

MW falls within Flood Zone 2 (medium probability of flooding) and Flood Zone 3a (high probability of flooding) according to the FRA done by Karakusevic Carson Architects for the Council. Mitigation includes using proposed, and present, open spaces as “flood storage area(s)”. The proposed parks and open public spaces are likely therefore to become wetlands, not suitable for park type activities such as children’s playgrounds, meeting friends for a picnic, or group games such as football. There is also the issue of proposed tall buildings in a flood area. (See point 2 above)

**Solution:** consider **more green space and wetlands for the MW area**, which could be delivered by opening up fenced off Green Belt land that surrounds the site between Banbury Reservoir and William Girling Reservoir.

#### **5. Harbet Road Industrial Estate**

This area is still designated SIL and is “beyond the proposed site allocation” (LBE Local Plan PL5 point1, page 58). It is to be “safeguarded for future plan periods”, but what those intentions *might* be should be considered now, since its extended use as SIL will impact on any housing, recreational and environmental use of space to the east of this area, as suggested in the current Local Plan. A core objective of the Meridian Water strategy is to deliver “parklife on your doorstep”, but this will not be delivered if there is an industrial estate between the residential areas, to the west of the River Lee, and the greenspace proposed for these residential areas (to the east of the Harbet Road).

The “safeguarding” of the Harbet Road Industrial Estate is highly problematic. The land is designated as SIL, and there seems to be no desire for the council to change or challenge this within the timeframe covered by the Local Plan (ie. up to 2039), due to the need for SIL in Enfield and its protected status. However, there is no evidence whatsoever to suggest that this SIL will not still be needed and therefore protected after 2039. This is a serious matter and could undermine the aspirations of the entire project and needs to be properly addressed in this local plan.

**Solution:** The council needs to **work with the London Mayor** to find ways to unlock the Harbet Road area by showing the positive aspects that will be delivered by **developing this area in terms of access to greenspace, homes, and additional employment. Without this, the entire project should be reconsidered.**

#### **6. Open Space (PL5.3)**

The Local Plan proposes that “Each phase of development must meet the 30% open public space target as a minimum and seek to deliver the maximum open space possible.” This is not how open space should be planned for, and can lead to undesirable outcomes, especially where high density tall towers are envisaged. The council already has a clear quantity standard for open space provision in its Blue and Green Strategy and this is further referenced in Policy DM CL5 and elsewhere (see Table 12.1 open space standard, which says the borough standard is 2.15 ha per 1,000 population).

It is not acceptable for the council to re-write this evidence-based policy to suit its own ends, which alarmingly appears to be to find an excuse to underdeliver green space at Meridian Water, which is located in an area that already has a deficit of greenspace.

**Solution:** the council needs to find ways to **increase greenspace provision at Meridian Water**. This can be achieved by **utilising underused and misused greenbelt land** in the surrounding area, which is currently fenced off from public access.

## **7. Pollution**

Although “a network of green corridors and public open spaces” is mentioned as necessary to any developer’s plan that is presented, it is very worrying that the “central east-west spine” suggested as a requirement is later referred to as a “trunk route”. (Neither ‘spine’ nor ‘trunk route’ is explained in the glossary) A trunk route means a major road with a dual carriageway. Meridian Water (MW) is already adjacent to the A406, a source of massive pollution. It is also adjacent to the Edmonton Incinerator, which is not mentioned in the MW section, nor the Angel Edmonton section, of this document. The plans for the Incinerator will have a huge impact on anyone living in the vicinity. (see point 7 below) A major road through the middle will pollute and further divide a community already divided by the A406. (acknowledged by the Council in this document at 3.5.1.)

**Solution:** The regeneration of Meridian Water as a major housing development should only proceed if (a) **the plans for the new Edmonton Incinerator are fundamentally altered** to ensure the health of future residents living in Meridian Water will not be harmed or at risk, and; (b) there are sufficient **mitigation measures** to remove the risk of **vehicle generated noise and air pollution** arising from the A406, Meridian Way and any new roads within the development itself. This must include **open spaces** such as the proposed Edmonton Marshes Park, as well as residential buildings and workplaces.

## **8. The incinerator (AKA “energy recovery facility” NLWA)**

It is stunning that no mention is made of the Edmonton Incinerator in the Council’s vision for MW. This is a massive issue for anyone already living in the area, potential residents, and also for everyone else, in this borough, adjacent boroughs and across London. It is a source of pollution at the highest level and is “... in one of the poorest areas in the country, where 65% of the residents are from ethnic minority backgrounds and air pollution already breaches legal limits.” (Guardian July 2020) The issues raised by the incinerator have to be courageously addressed by the Council but there seems to be no mention of it in this Local Plan.

**Solution:** the Council will have the courage to **pause and review the plans for the Edmonton Incinerator**.