

# Greenspace at Meridian Water

March 2021

## Introduction and Summary

The Regeneration & Economic Development Scrutiny Panel is due to meet on 17th March 2021.

On the agenda for this meeting is a review of the greenspace provision at Meridian Water, accompanied by a report authored by Periscope called “Meridian Water Masterplan; March 2021 0071-PR-RP-L-210303-Greenspace-Paper”.

We are concerned that the report from Periscope may not provide members with a full and complete analysis of the issues and have set out some of our concerns in this report.

In summary:

- The amount of open green space is too low and there could be a significant adverse health effect to existing and future residents arising from reduced access to green space. This has not been fully addressed in the Periscope report.
- The borough’s open space standards are not “outdated”.
- Some of the report’s claims rely on untested **assumptions** made in the “ELAAP Scenario Testing Evidence Base”, however a Planning Inspector decided that these assumptions were not valid.
- The authors of the Scenario Testing Evidence report questioned the 10,000 homes target and said “... there may be value, in all sense of the word, in a development that realizes slightly fewer homes”.
- The report claims that the green open space targets are “ambitious”, however Meridian Water will deliver proportionately less greenspace than Hong Kong and lower levels of green space than other developments in London.
- The report compares Meridian Water to schemes which we do not think are comparable and important contextual information is missing from the analysis.
- Some calculations in Periscope’s report are based on figures that do not tally with other reported figures.
- We think the parks proposed are far too small to meet the needs of 30,000 residents.
- Local people are losing large parts of their existing park and green spaces to make way for new housing, but this has barely been mentioned in the report.
- Too many homes are being squeezed onto the site - a rethink is needed to ensure that the health of future and existing residents is properly considered in terms of access to green open space.

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**Note:** Each section of this report refers to the corresponding section in the Periscope report (the page numbers of the Periscope report are provided for reference).

The tables show the claim made in the Periscope report in the first column then our response/comments/observations are provided in the next column.

## Local Plan Policy at Meridian Water (Periscope Greenspace Report, page 4 of 12)

Periscope Report	Better Homes Enfield Comments and Observations
<p>Meridian Water <i>should</i> not exacerbate greenspace deficiency in adjacent wards, it should provide appropriate levels of open and green space provision</p>	<p><b>This ignores the evidence that shows that Meridian Water is likely to exacerbate greenspace deficiencies in adjacent wards and that this could have serious consequences.</b></p> <p>The Periscope report acknowledges that adjacent wards have a deficiency of greenspace and that Meridian Water cannot meet the greenspace standard for 10,000 homes. Reports say that future residents of Meridian Water will need to use greenspace in adjacent wards. Therefore, Meridian Water <b>will</b> exacerbate greenspace deficiency in adjacent wards, unless additional greenspace is created in these wards.</p> <p>The Health Assessment conducted as part of the “SIW Environmental Statement” for Meridian Water Phase 2, states that there would be a significant adverse health effect to existing and future residents arising from reduced access to open green space. <sup>(1)</sup></p>
<p>The policy of 2.37 ha per 1,000 people is “considered outdated and not relevant to Meridian Water” and that the Council’s emerging Blue &amp; Green Infrastructure Strategy aims to update these standards.</p>	<p><b>This is misleading; the open space policy is particularly relevant to Meridian Water.</b></p> <p>The open space policy is a borough wide standard and is particularly relevant for developments in areas where there is a deficiency of greenspace. <sup>(2)</sup></p> <p><b>It is misleading to say the standard is “outdated”.</b></p> <p>The six acres standard (i.e., a minimum of 2.4 hectares of accessible greenspace per 1,000 head of population), is well recognised. Fields In Trust report that this standard is used by three-quarters of Local Authorities. <sup>(3)</sup></p> <p>The recent LBE Blue and Green Audit recommended a <u>minimum</u> of 2.15 hectares of public open space per 1,000 people, which is more than twice what Periscope appears to be advocating for Meridian Water. <sup>(4)</sup></p>

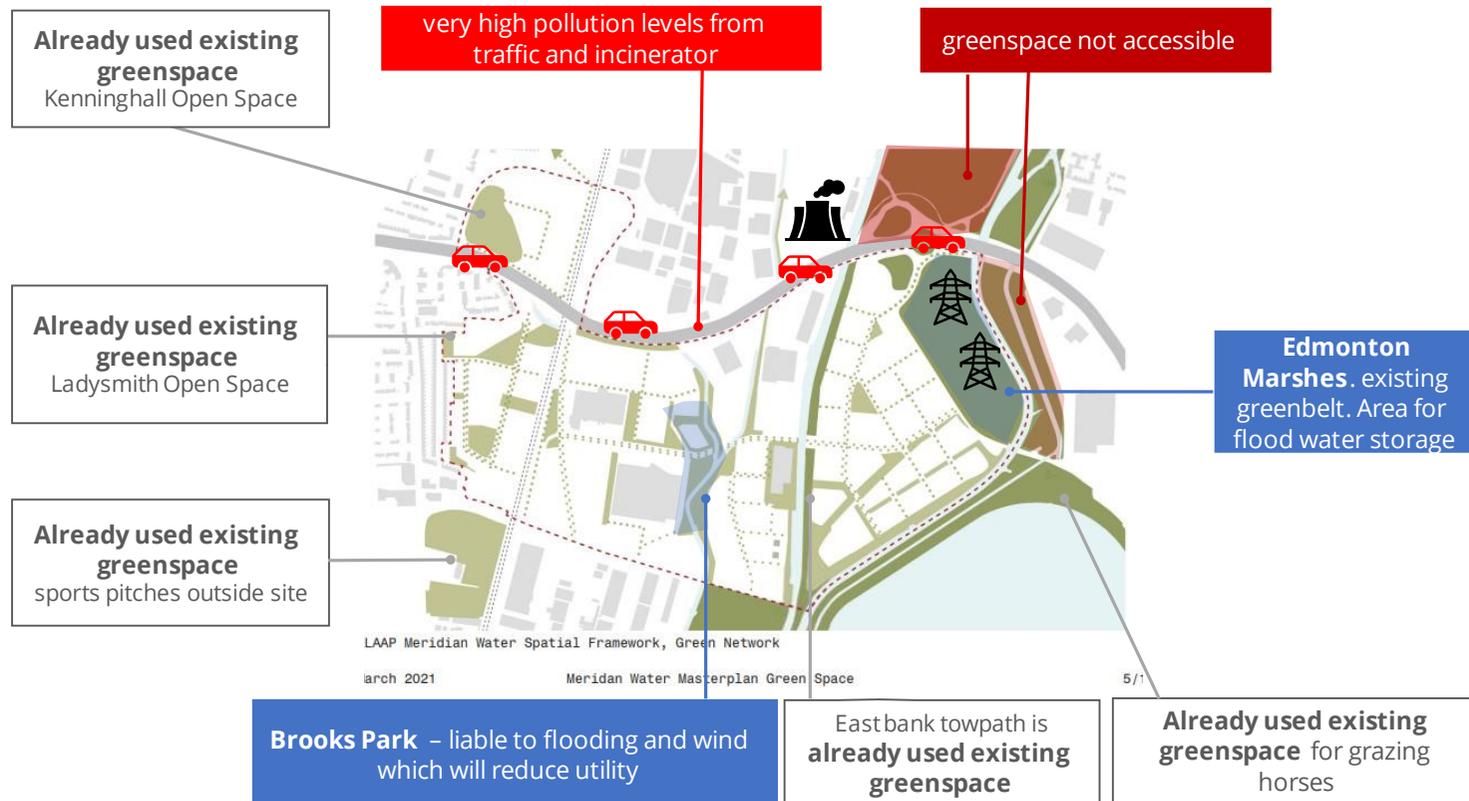
## ELAAP Policy (Periscope Greenspace Report, page 5 of 12)

Periscope Report	Better Homes Enfield Comments and Observations
<p>“The ELAAP Scenario Testing Evidence Base identifies that a baseline of <b>1 ha of green space per 1,000 people is appropriate for the type of development</b> proposed within the ELAAP when considering development quantum of between 5000 and 12000 homes”</p>	<p><b>The assumption that ‘1 ha per 1,000 residents is appropriate’ is an opinion, it was not tested or verified and the impact that this approach might have on the adjacent wards was not considered.</b></p> <p><b>The Planning Inspector appointed by the Secretary of State called into question assumptions made about open space proposed for 10,000 homes and questioned whether it was adequate.</b> The Inspector concluded that “<i>Taken together, these factors lead me to the view that many of the assumptions in the capacity study are no longer valid and that there is therefore no sound basis for concluding that the figure of 10,000 homes and 6,000 jobs is achievable and therefore justified</i>”. <sup>(5)</sup></p> <p>The author of the Scenario Testing Evidence Base questioned the target to build 10,000 homes, saying “... <b>there may be value, in all sense of the word, in a development that realizes slightly fewer homes</b>”. <sup>(6)</sup></p>
<p>“On this basis a 10,000 home proposal for Meridian Water using ELAAP policies would yield 24,500 people (GLA Population Yield Calculator, 2020) and require 24.5 ha of green open space, this is 30% of the site area”.</p>	<p><b>The population used in the calculation is lower than the figure quoted by Peter George.</b></p> <p>Peter George (Programme Director) recently said that 30,000 people will reside at Meridian Water. This would increase the green open space requirement from 24.5 hectares to 30 hectares. <sup>(7)</sup></p> <p>The ELAAP Scenario Testing Evidence Base set anything <b>over</b> 1 hectare as the minimum standard acceptable; it did not set 1 hectare as a “best practice”. <sup>(8)</sup></p>

**The Periscope report includes an image from the ELAAP which we feel may not comprehensively reflect greenspaces provision.**

Some of the spaces shown in the image are existing greenspaces (e.g., Kenninghall), and some are already well used by existing residents in adjacent wards (e.g., towpath). Some of the greenspace shown is not greenspace (e.g., the area north of the A406 is currently a building site) and should not be viewed as greenspace delivered as part of the scheme. Some of the greenspace is inaccessible (e.g., east of Edmonton Marshes). The two main parks will be used for flood water storage (which will reduce utility). The space at Edmonton Marshes is affected by large pylons, noise and pollution. We have overlaid some of our concerns on the illustration below (see figure 1).

Figure 1. ELAAP greenspace illustration showing some of the issues/challenges



## Environmental Sustainability (Periscope Greenspace Report, page 6 of 12)

Periscope Report	Better Homes Enfield Comments and Observations
<p>“The Meridian Water Environmental Sustainability Strategy (ESS) was approved by cabinet in 2020 and sets out ambitious targets for green and open space at Meridian Water.”</p>	<p><b>We do not agree that the targets for green and open space at Meridian Water are “ambitious”:</b></p> <ul style="list-style-type: none"> <li>• Less than half the greenspace required by the quantity standard will be delivered in an area that is already deficient in greenspace. This means the deficiency will get worse.</li> <li>• There appears to have been no consideration of the impact of the development on adjacent wards or how to mitigate adverse effects, yet the plan is to use greenspaces in these wards.</li> <li>• The Health Assessment for Phase 2 stated that there will be a significant adverse health effect to existing and future residents arising from reduced access to green space. <sup>(9)</sup></li> </ul> <p><b>The public were not consulted about the Environmental Sustainability Strategy and were not given the opportunity to discuss their concerns with the project team.</b></p>
<p>“The 30% green open space target set out in the ESS is considered to go beyond contemporary best practice”</p>	<p><b>Setting a target for green and open space based on a percentage of the land is not the standard approach for green open space targets and is problematic.</b></p> <p>The standard approach is to calculate the greenspace provided per 1,000 population, so that deficiencies can be identified and responded to. This approach is used by more than 75% of councils across the UK, including Enfield. It is also the approach used in the recent LBE Blue and Green Strategy Audit, which says “In line with recognised guidance quantity standards are expressed as hectares per 1,000 residents (ha/1,000)”. <sup>(10/11)</sup></p> <p><b>Using this approach, Meridian Water will deliver less open green space than Hong Kong.</b></p> <p>Using a percentage approach does not account for population densities and can create unhelpful results. For example, 40% of Hong Kong’s land area is country parks (far higher than the 30% proposed for Meridian Water), yet Hong Kong is widely regarded as having extremely small amounts of public space; residents of Hong Kong only have 2.7 square metres per person compared to 10 in New York. <sup>(12)</sup></p>

Periscope's report includes three examples which it says supports the claim that the 30% threshold is "best practice".

**We do not agree that a 30% threshold is best practice.**

When found other schemes that appear to perform better than Meridian Water in terms of green and open space e.g. Kidbrooke Village, Hendon Waterside, Clapham Park, The Twelve Trees Park, Ridgeway Views and Purfleet Centre Regeneration etc.

**We felt the analysis provided in the report could be misleading because:**

- **Contextual information is missing.** For example, Woodbury Down is connected to Finsbury Park (45 hectares) and is 800 metres walk from Clissold Park (20 hectares). East Village is adjacent to (part of) the enormous Queen Elizabeth Olympic Park.
- **The comparison schemes are all in inner London,** so compromises tend to be more acceptable as they have other benefits such as far better public transport links and other cultural and economic advantages.
- **Other reports suggest the comparison schemes have a higher percentage of green open space.** We also found the ratio of population to green open space at these schemes was better than at Meridian Water.
- **The figures used as the basis for the calculation of green open space at Meridian Water does not match published information.** The calculation is based on a site of 81.7 hectares (the site is regularly reported to be 85 hectares) and a population of 24,500 (the Programme Director says the population will be 30,000).<sup>(13)</sup>
- **It appears that waterways (blue space) may have been included in the calculation of open space at Meridian Water, but blue space was not included for some comparison schemes.**
- **Less than 24.5 hectares of new green open space is planned for Meridian Water.** An FOI request responded to by Lisa Woo (Head of Placemaking, Meridian Water) shows that a total of 21.81 hectares of green open space is planned or 25.57 if waterways (blue spaces) are included. However, these figures do not account for either the loss or use of existing greenspaces (e.g., Kenninghall and Ladysmith Open Space and towpaths). Once this is factored in, we estimate that the new additional green open space delivered will be approximately 18.14 hectares, or 21.9 hectares if waterways are included.

Below is an alternative analysis. This is provided to show that there are alternative ways of analysing these schemes that would yield different results from those set-out in Periscope’s report. This analysis shows that Meridian Water delivers a lower percentage of open green/blue space than comparison schemes and a far lower ratio of open green/blue space per 1,000 residents.

	Woodbury Down	King’s Cross Central	East Village	Meridian Water
Borough	Hackney	Camden	Newham	Enfield
Designation	Inner London	Inner London	Inner London	Outer London
PTAL public transport rating (0 = worst, 6a/b = best)	4-6a	6-6a/b	6a	0-2/3 <i>(much lower than others)</i>
Site area (hectares)	52.5	27.1	27	85
Dwellings	5,500	1,900	3,300	10,000
Average density (dwellings per hectare)	105	70	122	118
Population	12,000	3,640	6,000	30,000
Public open green/blue space (hectares)	23.4	10.5	14	21.9
<b>Percentage of open green/blue space</b>	45%	39%	52%	<b>26%</b> ↓ <b>Much lower than other</b>
<b>Ratio (Ha of green/blue open space per 1,000)</b>	<b>1.95</b>	<b>2.88</b>	<b>2.33</b>	<b>0.73</b> ↓ <b>Much lower than others</b>
Other important contextual information:	Incl. new nature reserve (Woodbury Wetlands)  The 45 ha Finsbury Park is adjacent to site and connected via the green New River Loop. Clissold Park (20 ha) is approximately 800 metres walk.	Includes 10 new public parks and squares.	Next to Queen Elizabeth Olympic Park – 285 hectares of parkland, waterways, and nature trails connected by paths for jogging cycling and walking.	

Woodbury Down figures are taken from the Meridian Water ESS and include blue space; King’s Cross Central figures are taken from planning applications and sustainability reports; East Village figures come from eastvillagelondon.co.uk; The Meridian Water figures are based on 85 hectares, 30,000 residents and total additional green/blue space. The ratio for MW would increase to 0.85 if park losses were ignored and to 1.01 if the urban square is included.

## Consented Parks (Periscope Greenspace Report, page 8 of 12)

Periscope Report	Better Homes Enfield Comments and Observations
<p>The report refers to two new parks: <b>Brooks Park</b> (1.64 hectares) and, <b>Edmonton Marshes</b> (6.5 hectare)</p>	<p><b>We think these parks are too small to meet the needs of 30,000 additional residents + workers.</b></p> <p>Brooks Park is small and will be classed as “small local provision”; it is about the size of 2.5 football pitches. <sup>(14)</sup></p> <p>Brooks Park will be smaller than Kenninghall Open Space (1.86 hectares). Images of Kenninghall Open Space are included in the appendix for reference. By comparison, Town Park is <b>9.67</b> hectares and Pymmes Park is <b>20.48</b> hectares. <sup>(15)</sup></p> <p>Both Edmonton Marshes and Brooks Park will be used for flood storage, which will reduce their utility (a concern raised by the Planning Inspector who reviewed the plans). <sup>(16)</sup></p>
<p>“Edmonton Marshes incorporates a number of infrastructure elements including existing electricity pylons.”</p>	<p><b>We do not think the presence of large pylons will create an inviting park space.</b></p> <p>Concerns about the pylons were raised in a recent scrutiny report. In response council officers stated that “it would be preferable for the pylons to be undergrounded”. However, the pylons now appear to be staying. <sup>(17)</sup></p> <p>We think the large pylons reduce usable park space and negatively impact on the sense of openness and tranquillity that is needed from an inviting greenspace. Furthermore, Edmonton Marshes is near the A406 and incinerator, this means poor air quality and noise could impact enjoyment and use of this space.</p>
<p>“These two new parks are some of the largest to be planned in London and will be the largest to be delivered in the Lea Valley since the London 2012 Olympics. They answer the call of the CPRE to create ‘Ten Major New Parks for London’”</p>	<p><b>The two new parks are too small for the number of residents who will be using them.</b></p> <p>We do not think these parks answer the call of the CPRE to create “Ten Major New Parks for London” because the parkland currently proposed for Meridian Water is too small for the population.</p> <p>Other parks in London have been created (e.g., Cator Park) and Lee Valley Walthamstow Wetlands was opened up to the public in 2017.</p>

## Specific Sites (Periscope Greenspace Report, page 9 of 12)

Periscope Report	Better Homes Enfield Comments and Observations
<p>Kenninghall Road / Open Space</p>	<p><b>Local people are losing existing parkland to make way for Meridian Water.</b></p> <p>Kenninghall Open Space is used by local residents. The space is currently 1.86 hectares; however, an FOI response shows <b>the plans are to reduce this to 0.82 hectares.</b> <sup>(18)</sup></p> <p>Another nearby local space (Ladysmith Open Space) has <b>already been reduced in size.</b> <sup>(19)</sup></p> <p>The loss of parkland is a disadvantage to local people in an area that is deficient in green open space.</p>
<p>Lee Navigation Tow Path</p>	<p><b>It is unclear whether the towpaths outside the site cope with the usage associated with an additional 30,000 residents.</b></p> <p>The towpath surrounding the site is increasingly well used by walkers, runners and cyclists. There are also an increasing number of people living on the canal.</p> <p>The towpath will be one of the main access points to the Lee Valley Regional Park for people living at Meridian Water. It is important to consider whether it will cope with the anticipated usage and the impact on existing users.</p> <p>We think the council needs to clearly state how the increased usage of the towpaths <u>outside the site boundaries</u> will be accommodated in order to avoid a negative impact on existing and future users.</p>
<p>Tottenham Marshes “Enfield Council responded to these concerns and demonstrated how pressure on Tottenham Marshes would be mitigated in the planning application submitted by the Council for 2300 homes”</p>	<p><b>The report is saying Tottenham Marshes will cope with an additional 2,300 homes, but is ignoring the fact that the aim is to have 10,000 homes.</b></p> <p>The greenspaces surrounding Meridian Water are increasingly well used. As an indication, visitor numbers to the Lee Valley Regional Park as a whole increased by 45% in the five years to 2018, with over 7.3 million visitors in 2017-2018. Tottenham Marshes is under particular pressure due to increased densification to the south of the site (Hale Wharf, Hale Village, Ferry Island and North Island) and to the north from Meridian Water. <sup>(20)</sup></p>

## References

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2. Enfield's Development Management Document Adopted (November 2014), DMD 72.  
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3. Guidance for Outdoor Sport and Play | Fields in Trust  
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5. edmonton-leeside-inspectors-report-planning.pdf (enfield.gov.uk), page 9 (points 37 and 38)  
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<https://local.london/movers-and-shakers-peter-george-at-the-helm-of-meridian-water-a-pioneering-6bn-regeneration-programme/>

14. Let's Talk: Enfield Blue and Green Strategy, Enfield Blue and green Structure Infrastructure Audit, page 23

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15. Let's Talk: Enfield Blue and Green Strategy, Enfield Blue and green Structure Infrastructure Audit, Appendix C

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16. edmonton-leeside-inspectors-report-planning.pdf (enfield.gov.uk), page 9 (points 37 and 38)

<https://new.enfield.gov.uk/services/planning/edmonton-leeside-inspectors-report-planning.pdf>

17. Meridian Water Scrutiny Workstream - Reply to Response Sept 2020 (enfield.gov.uk), page 32

<https://governance.enfield.gov.uk/documents/s83815/Meridian%20Water%20Scrutiny%20Workstream%20-%20Reply%20to%20Response%20Sept%202020.pdf>

18. parks and green spaces at Meridian Water - a Freedom of Information request to Enfield Council - WhatDoTheyKnow

[https://www.whatdotheyknow.com/request/parks\\_and\\_green\\_spaces\\_at\\_meridi](https://www.whatdotheyknow.com/request/parks_and_green_spaces_at_meridi)

19. Residents of Edmonton Angel Community Together says Ladysmith Road open space was leased for just £1 | Enfield Independent

<https://www.enfieldindependent.co.uk/news/11783732.residents-of-edmonton-angel-community-together-says-ladysmith-road-open-space-was-leased-for-just-1/>

20. Lee Valley Ice Centre, Lee Bridge Road, London E10 7QL, Planning Statement, page 25 (point 6.11)

<https://www.walthamforest.gov.uk/sites/default/files/LVIC%20planning%20statement%2011%20Feb%202020%20FINAL%20.pdf>

## Appendix

(A1) View of Kenninghall Open Space, which is currently larger than Brooks Park. Can a space this size accommodate the needs of 30,000 residents?



A2. Aerial view of Kenninghall Park. This park is currently used by local residents **but reduced will be significantly in size** and have far more people using it due to Meridian Water.



A3. A view of Edmonton Marshes looking north - pylons are now staying (note incinerator and A406)



A4. A view of Edmonton Marshes looking south, showing pylons and A406.

