

Pell Frischmann		Project No. A13402/VAA
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TECHNICAL NOTE	Project IKEA Tottenham	Date 17/09/2018
Subject Edmonton Leaside Area Action Plan 2018 – Response to Matter 6 of the Inspector’s Matters, Issues and Questions		By S Moody/ P Smith

INTRODUCTION

Pell Frischmann is commissioned by IKEA Properties Investments Ltd (IKEA) to provide transport planning and highways consultancy advice in connection with the existing IKEA Tottenham store situated on Glover Drive, Enfield, London, N18 3HF (the ‘store’), within the London Borough of Enfield (the ‘borough’).

Pell Frischmann has reviewed the transport specific evidence relating to Meridian Water Area Action Plan (AAP) policy, along with other reports provided by the London Borough of Enfield. IKEA is an important existing business and local stakeholder, and therefore the emerging AAP should not compromise the operation of the existing store.

RESPONSES TO INSPECTOR’S QUESTIONS

This technical note provides responses to the questions raised by the Inspector. These are addressed, and responses are provided where applicable.

- (i) *Is the plan supported by an adequate Transport Assessment? Can it adequately support a modal shift given the reliance of current occupiers on cars?*

The AAP is not supported by an adequate Transport Assessment. There is no evidence to demonstrate that Meridian Water is able to sustainably accommodate the proposed Causeway/Boulevard and overall quantum of development, or indeed that IKEA’s operational needs will not be adversely affected. Without this, the AAP is neither fully justified nor effective and cannot provide a sound strategic framework for sustainable development.

The Transport Review submitted as a supporting document for the examination (dated 15th December 2016) includes information relating to development quantum, accessibility and density, car parking, and person travel.

The AAP is therefore not supported by a transport assessment that utilises an evidence base that allows a comprehensive transport strategy to be developed. The information in the Transport Review (dated 15th December 2016) does not include a transport strategy that would facilitate the development, or a depth of analysis that allows the transport impact of the Meridian Water AAP proposals to be understood. The lack of supporting evidence is alluded to in the Inspector’s Initial Observations letter dated 24th May 2018.

It is understood that a Housing Infrastructure Fund (HIF) application is being prepared by the Council for submission in September 2018, and IKEA has been informed of the process. As part of this, we have been advised that a WebTAG compliant model will be developed to support further transport assessment of the Meridian Water development, but that this work will take between six and nine months to complete and is not due to commence until April

2019. This updated modelling would supersede the evidence presented in the Strategic Modelling Report (October 2016), which has been shared with IKEA, but does not form part of the evidence base submitted as part of the Examination in Public.

The Strategic Modelling Report (October 2016) reports the high-level strategic highway modelling undertaken to support Phase 1 of the Meridian Water Masterplan and inform the masterplan design of the development. It is noted that the modelling offers comparison between the reference case and do minimum scenarios, and comparison between the do minimum and do something scenarios. No comparisons are made between the do something scenarios and the reference cases.

The do minimum and do something scenarios include 10,000 homes and 6,000 jobs (as well as a further scenario of 5,000 homes and 3,000 jobs). It is stated that when comparing the do minimum to the reference case “both development scenarios result in significant increases in traffic on the highway network local to Meridian Water.” Therefore, whilst the Strategic Modelling Report (October 2016) could be submitted as part of the Examination in Public, this would not support the approval of the AAP as the report itself acknowledges that 10,000 homes and 6,000 jobs would have a significant impact, and a comprehensive package of mitigation is not fully detailed and does not return the network to reference case conditions.

The analysis also uses a high-level strategic model and therefore additional consideration of the local road network in more detail is required using stand-alone junction models to confirm whether this will operate efficiently when the AAP development is complete.

In addition, the mode shares presented in the Strategic Modelling Report (October 2016) are used to determine the multi-modal trip generation of the Meridian Water development. However, the same mode share has been applied to all homes across the development. Clearly, the mode choice made for a journey is determined by multiple factors, principally including the proximity, availability, and attractiveness of the transport options. Therefore, homes closer to public transport nodes are more likely to generate public transport trips.

It is considered that the transport information supporting the AAP is incomplete and lacks up-to-date WebTAG compliant modelling and a comprehensive multi-modal transport strategy. This represents a risk to IKEA in that there is insufficient information to determine if the impact of the ambitious growth plans (10,000 new homes and 6,000 new jobs) can be viably mitigated and therefore that the operation of the existing store will not be compromised.

(ii) *Are references to uplifts in PTALs realistic given that transport improvements of train services are not committed?*

(vii) *Does the plan appropriately take account of the potential for Crossrail 2?*

High densities of development are reliant on being located in areas where there is a very good or excellent level of public transport accessibility. This must be demonstrated through a comprehensive evidence-based transport strategy, and/ or being within a short walk (800m) of ‘major’ town centre retail, employment, and leisure facilities.

The mode shift assumptions in the Strategic Modelling Report (October 2016) modelling assumes that Crossrail 2 will be operational in the 2031 forecast year and subsequent junction modelling would result in schemes that are reliant on Crossrail 2 being delivered. The Transport Review submitted as a supporting document for the examination (dated 15th December 2016) sets out housing density and PTAL scenarios based on two definitions of location: urban and central.

It must be noted that Crossrail 2 is not a committed scheme and, given the recent announcement of delays to Crossrail 1, it suggests that the timing of a Crossrail 2 is also uncertain.

The 'Schedule of Responses in Plan Order' (SRPO) document, which summarises consultation responses to the Proposed Submission AAP in March/April 2017, includes a response from TfL relating to Crossrail 2. This states that Crossrail 2 is beyond the time period of the AAP and is likely to require significant private sector funding to deliver it by 2033.

It is considered that the uplifts in PTALs required to achieve the highest density scenarios are reliant on Crossrail 2, which is not a committed scheme. This is a risk that needs to be appreciated when reviewing the AAP proposals.

- (iii) How can the implementation of improved public transport links to and through the plan area be best secured?
- (iv) Does the Plan make adequate provision for east west movement by public transport/ bus routes through the site? How will this be supported? Does it recognise the need of existing occupiers, including bus operators?
- (vi) How are the needs of cyclists and pedestrians reflected in the plan?
- (viii) Should specific transport projects to deliver public transport improvements be included in Part D of the Plan?

Within the SRPO, the consultation response by TfL also highlights that significant investment will be required in the bus network. The Transport Review (dated 15th December 2016) includes a table (Table 8) which states the number of buses that would be required. However, it is unclear on whether these are new services, the routes these would take, how many buses would be needed to operate along a route, or the frequency of the bus service. The programme of this bus provision is unknown, as it is not covered in any Infrastructure Delivery Plan, and there is no policy requiring delivery by any trigger points. Quod's Position Statements on Matters 8 and 9 expand on this omission,

The existing transport evidence submitted for the AAP does not detail this information, and this should be outlined within a comprehensive transport strategy for the Meridian Water development. The lack of a comprehensive transport strategy also means that there are concerns that the public transport, and walking and cycling networks have not been considered in appropriate detail.

- (ix) In relation to the Causeway, it is necessary for the alignment of The Causeway to be fixed in the Plan? Is it achievable? Does it adequately take account of existing constraints? How will it serve or impact on existing operators?

It is considered that at this stage the alignment of The Causeway/Boulevard should not be fixed. This is because there is insufficient technical information available to fix such a fundamental structuring principle as no comprehensive transport strategy has been shared to allow informed judgements to be made. Officers at LBE have confirmed that the AAP will be modified in order to make it clear the alignment is indicative only at this stage, and that they intend to agree this with IKEA through a Statement of Common Ground (SOCG).

This is necessary to help ensure that the continued operation, visibility and accessibility of the IKEA store and the future growth of the business is not inhibited by the emerging AAP. Until this modification is formally agreed within a signed SOCG, IKEA maintain their objection to this element of the Plan.

WebTAG compliant transport modelling, greater understanding of bus operations and the site constraints, and extensive consultation with existing operators (including IKEA) are needed before the alignment can be fixed.

(v) Does the Plan provide for appropriate levels of parking?

Car parking requirements in the AAP area are set out for the residential land use, but no detail is provided for other land uses. Whilst the proposed residential car parking standards are set out as being 40% of housing with 0.6 spaces per unit and 60% of housing with 0.4 spaces per unit, there is no commentary on the alignment of this car parking provision against the transport strategy for the development, and the car driver mode share used in the modelling discussed in the Strategic Modelling Report (October 2016).

(x) Does the Plan consider fully the potential for waterway movement through the site? Is there a potential conflict with the aims of flood avoidance and biodiversity improvement?

(xi) Would the wording proposed in the relevant Plan policies be an effective means of achieving the aims and objectives of the Plan?

We have no comments relating to these two questions.

SUMMARY

In summary the key points of concern are as follows:

- The transport information supporting the AAP is incomplete and lacks a comprehensive multi-modal transport strategy and up-to-date WebTAG compliant modelling.
- The uplifts in PTALs and consequently the forecast transport mode share for the higher density scenarios are understood to be reliant on both significantly increased bus services which have not been underpinned by a transport strategy and in a step change increase in rail mode share most likely dependent on Crossrail 2, which is not a committed scheme. This is a risk that needs to be appreciated when reviewing the AAP proposals.
- The lack of a comprehensive transport strategy also means that there are concerns that the public transport, and walking and cycling networks have not been considered in appropriate detail.
- It is considered that at this stage the alignment of The Causeway/Boulevard should not be fixed. This is because there is insufficient technical information available and no comprehensive transport strategy to allow informed judgements to be made.
- Car parking requirements in the AAP area are set out for the residential land use, but no detail is provided for other land uses.

- There is no commentary on the alignment of the proposed residential car parking provision against the transport strategy for the development, and the car driver mode share used in the modelling discussed in the Strategic Modelling Report (October 2016).

In conclusion it is considered that without the availability of a comprehensive transport strategy and accompanying multi-modal transport modelling there is insufficient information to determine that the operation of the existing IKEA store will not be compromised. Therefore, IKEA maintain their objection to the Plan.