

Examination of Edmonton Leaside Area Action Plan – Matter 2: Employment

Hearing Position Statement on behalf of Aytans
MFG Co UK Limited

September 2018

Turley

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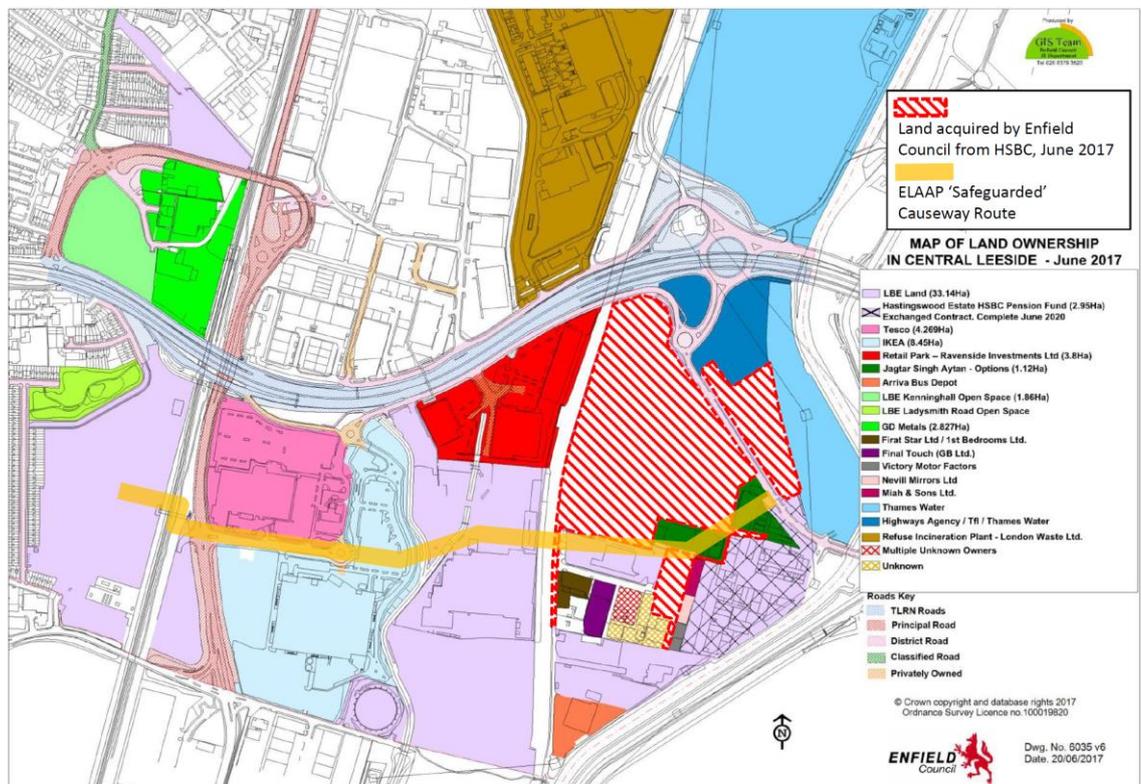
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September 2018

1. Introduction and Summary Overview

- 1.1 This Position Statement is submitted by Aytans MFG Co UK Limited in relation to Matter 2: Employment and the related Inspector's questions ahead of the Examination of the Proposed Submission Edmonton Leaside Area Action Plan 2018 (ELAAP).
- 1.2 Specific focus below is given to Questions (i) to (v), (vii), (viii), (ix) and (xi) in relation to the extent to which the policies in the ELAAP accord with the aim of the National Planning Policy Framework 2012 (NPPF) to contributing to a strong, responsive and competitive economy.
- 1.3 JS and SS Aytan are the freehold owners of two key parcels of land that lie within the eastern part of the Meridian Water area of the ELAAP. Aytans MFG Co UK Limited is the Aytan's clothing business. The business is currently located in a unit known as Block F, adjacent to Harbet Road.
- 1.4 Previous representations were made by Turley jointly in the name of Aytans MFG Co UK and LaSalle Investment Management (LIM), acting on behalf of HSBC Pension Fund. HSBC owned a large proportion of the land (approximately 13.5 hectares) on the east side of the Meridian Water area. Since the Proposed Submission ELAAP was published and representations were made, HSBC sold its land interests to the London Borough of Enfield in June 2017. The land sold to the Council is hatched red in **Figure 1** below. A larger scale version of the figure is provided at **Appendix 1**.



- 1.5 Two plots (each of approximately 0.6 hectares in area) known as the Silvermere site and Triangle site were sold by HSBC in October 2016 and April 2017, respectively, to JS

and SS Aytan. The land is shown in dark green in **Figure 1**. Their firm intention is to retain this ownership in order to construct two buildings for flexible B1c/B8 use, with ancillary showroom and offices. These buildings were granted planning permission by Enfield Council (application references 17/02151/FUL and 17/02152/FUL) on 11 May 2018. The buildings are to enable the Aytan's clothing business to relocate from Block F and expand at Meridian Water.

- 1.6 Section 2 of the April 2017 Representations submitted by Turley on behalf of Aytans MFG Co UK Limited and LIM set out in detail the position regarding employment land, employment projections, concerns regarding the proposed de-designation of land at Meridian Water as a Strategic Industrial Location (SIL) and the unsuitability of operational land at Deephams Sewage Treatment Works (STW) as new SIL.
- 1.7 It is the intention of the Aytans to rely principally on section 2 and section 3 of the April 2017 Representations with regard to Matter 2: Employment and the Inspector's questions (i) to (xi). Updates are provided where relevant, for example arising from the draft new London Plan published in November 2017. In summary and overview:

Q (i) and (ii)

- 1.8 The intention to achieve 6,000 new jobs at Meridian Water is an aspiration with no firm basis in evidence. The proposal to de-designate approximately 9.5 hectares of land at the Stonehill Estate (part of the wider 18 ha. de-designation at the Harbet Road industrial estates) as SIL to assist in achieving this employment figure is not justified and is unsound. The land is required as part of the reservoir of industrial land of strategic importance.

Q(iii)

- 1.9 The continued allocation of the Stonehill Estate as SIL is important to support employment and economic growth in Meridian Water. The type of businesses it will accommodate and the quality and diversity of jobs created are entirely compatible with the delivery of employment objectives for Meridian Water in the Development Plan. It will not unduly prejudice delivery of intentions for other parts of the ELAAP at Meridian Water, such as the delivery of new homes.

Q(iv) and (v)

- 1.10 The new allocation of Deephams Sewage Treatment Works within the ELAAP area as SIL is not justified as a suitable, appropriate or effective strategy. It cannot be viewed as suitable or appropriate mitigation to SIL which would be lost at the Stonehill Estate and/or to maintain capacity for employment of industrial, logistics and distribution uses when considered against the alternative of retaining the 18 ha of the Stonehill Estate and Harbet Road estates as SIL.

Q(vii), (viii), (ix) and (xi)

- 1.11 The ELAAP is not consistent with national policy in respect of contributing to a strong, responsive and competitive economy. The approach to providing jobs and employment, bearing in mind the locational and other characteristics of Meridian Water is not sound. In addition, the needs of existing businesses (such as Aytans MFG Co UK Limited clothing business aspirations to grow at Meridian Water) have been given inadequate consideration.

1.12 To assist the Inspector in identifying the respective areas of land referred to in this Statement, Figure 2 below will hopefully be useful.

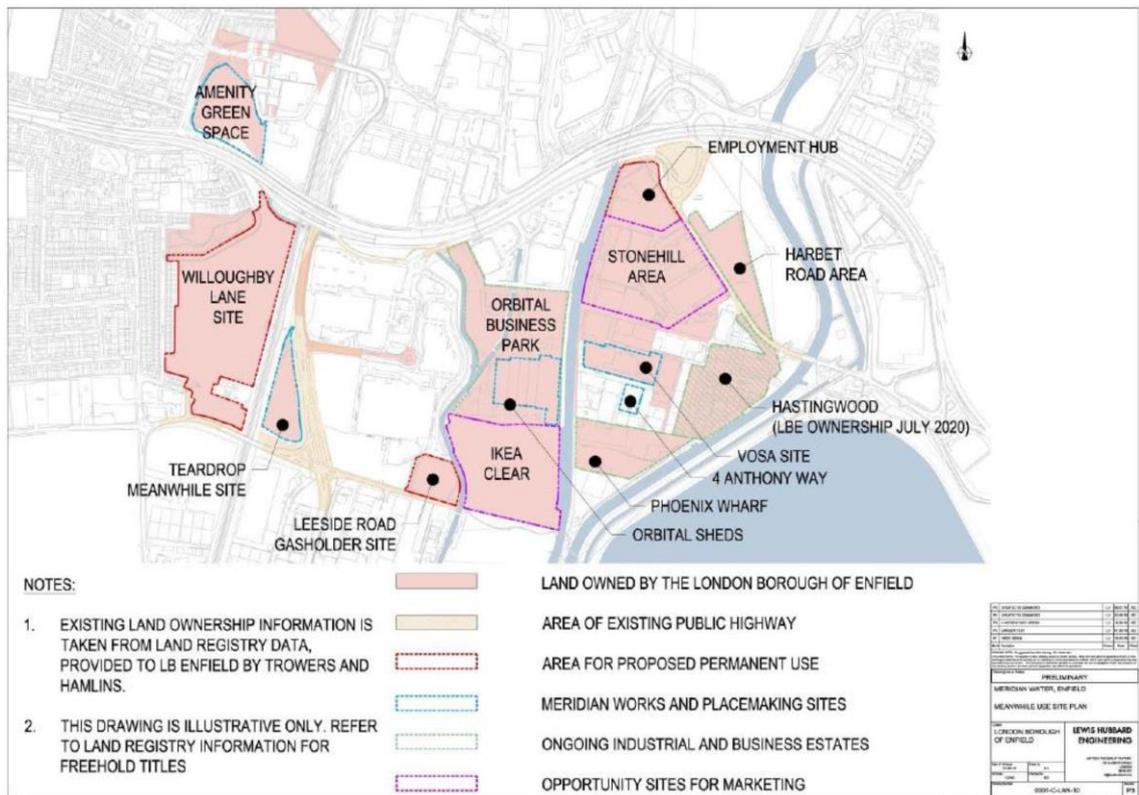


Figure 2: Land Ownership and Area Identification at Meridian Water¹

1.13 With regard to paragraph 182 of the NPPF, and in combination with other Position Statements in respect of other matters, the ELAAP is unsound on the basis of:

- Not being **justified**, as the most appropriate strategy, since the approach to employment land in the ELAAP has not been subject to a transparent comparative and equal assessment of reasonable alternatives in the evidence base or in the Sustainability Appraisal; and
- Is not **justified** or **effective**, and cannot be presented as the most appropriate strategy when considered against reasonable alternatives (for example, designating operational Deepphams STW land as ‘mitigation’ for loss of very well located SIL).

Changes to the ELAAP to resolve the objection

1.14 Section 3 below sets out the changes requested to resolve the representations made by Aytans MFG Co UK Limited under Matter 2.

¹ Extract from agenda pack presented to Enfield Cabinet on 25 July 2018

2. Matter 2: Employment

2.1 Turley Representations to the ELAAP in April 2017 focused on draft Policy EL2 'Economy and Employment in Meridian Water' and the supporting text for the policy in section 5, plus Section 6.4, Figure 6.1 and Table 6.2.

2.2 This section of this Statement seeks to respond in detail to the Inspector's questions under Matter 2, framed around the issue of "whether the policies in the plan accord with the aim of the Framework, to contribute to a strong, responsive and competitive economy", as follows:

Q(i) Are the proposed employment projections at Meridian Water justified and based on sound evidence?

2.3 Paragraphs 2.34 to 2.44 of the Turley 2017 Representations address directly the issue of whether the proposed target of 6,000 net new full time jobs is justified. Paragraph 2.44 draws the assessment to a conclusion and explains that the grounds and justification for the 6,000 job figure is unclear and has not been proven. It is merely an aspiration and should not be regarded as a 'need'. In terms of the soundness tests, the '6,000 to 7,000' new jobs referred to in Policy EL2 is not positively prepared or justified by sound evidence.

2.4 Using this job figure as the basis to justify the entire removal of SIL at this location is therefore also not justified.

Q(ii) What would be the effects of the loss of 9.5 hectares of land designated as Strategic Employment Land (SIL) on employment in the Borough and on the wider area?

2.5 The significance and purpose of SIL designations in a London-wide context and in other Enfield Development Plan documents is explained at paragraphs 2.3 to 2.18 of the Turley 2017 Representations.

2.6 At paragraph 2.31, the Representations flag the intention in the ELAAP to de-designate from SIL of the whole of the Harbet Road industrial estate – in fact comprising 18 hectares of land. (A loss of 9.5 hectares is a component of this 18 ha. and relates to the Stonehill Estate).

2.7 The de-designation is described at paragraphs 5.4.11, 5.4.12, draft Policy EL2 and in section 6.4. Text in EL2 states that the "restrictive SIL and LSIS industrial land designations within the Meridian Water boundary are not compatible with either the economic and employment objectives, or the wider aims of transformational change". This runs directly counter to the Development Plan position² and emphasis at page 131 of the ULVOAPF (ref. **NRBD-03**) that the protection of SIL in this location is as important to the success of the growth areas as the new mixed-use developments proposed.

² Including in London Plan Policy 2.17, Enfield Core Policy 14 and Policy 37

- 2.8 The effects of the loss of the SIL on employment locally and in the wider area are potentially significant. Paragraphs 2.45 to 2.69 of the Turley 2017 Representations examine in detail importance of maintaining the stock of industrial land in Enfield (which is the largest stock in north London), performing a strategic logistics function of ‘greater than sub-regional importance’.³ This in turn directly supports other businesses and services locally and across London. The proven need for logistics and distribution uses is robustly documented in the adopted London Plan and its evidence base documentation (as referred to at paragraphs 2.54 to 2.58 of the Turley 2017 Representations).
- 2.9 In the letter from Mr Jules Pipe, Deputy Mayor for Planning, Regeneration and Skills to Mr James Gummery of Enfield Council, 7 July 2017, (refer to **Appendix 1**) the Deputy Mayor’s comments and concerns regarding the proposal to remove 18 hectares of SIL in the ELAAP are made clear. This is to the extent that in the third paragraph on the third page of the letter, it is stated that:
- “Therefore, it is my opinion that the approach to the quantum of SIL and LSIS release and configuration as detailed in Policy EL14 ‘New Strategic Industrial Locations in Edmonton Leaside’ (page 88) and Table 6.2 ‘New SIL Designated Areas in Edmonton Leaside’ (page 87) is not in general conformity with the London Plan’.* (Emphasis added).
- 2.10 Since the letter was published, the draft new London Plan has been published and respective evidence base documents. Whilst the new London Plan will be subject to Examination, the stance taken in respect of employment land in many London boroughs, including Enfield has hardened in respect of the protection of the employment land that remains.
- 2.11 Table 6.2 of the new London Plan refers to ‘Management of industrial floorspace capacity - industrial property market area and borough-level categorisations’. Enfield is listed as a borough to ‘Provide Capacity’. Text at paragraph 6.4.6 states that *“Boroughs in the ‘Provide Capacity’ category are those where strategic demand for industrial, logistics and related uses is anticipated to be the strongest”* based on evidence base documentation. These Boroughs *“should seek to deliver intensified floorspace capacity in either existing and/or new locations accessible to the strategic road network and in locations with potential for transport of goods by rail and/or water”*.
- 2.12 It is clear that there should be no loss of SIL at Meridian Water. Paragraphs 2.59 to 2.69 of the Turley 2017 Representations explain why Stonehill Estate, as part of the SIL at this location is ideally suited to accommodating industrial, logistics and manufacturing uses. Loss of this land as SIL would severely compromise the ability of the Borough to attract and retain business and resulting employment which require locations with characteristics evident at Meridian Water in terms of proximity to the strategic road network, rail, water, workforce, related businesses and customer base.

³ GLA, London Plan, 2016, Table 2.1

Q(iii). How could its retention support Meridian Water?

2.13 Paragraphs 2.70 to 2.74 of the Turley 2017 Representations neatly address the question by explaining how SIL-compatible uses can contribute directly to achieving the economic and employment objectives for Meridian Water. Such objectives are set out in identified ELAAP paragraphs and policies. It is demonstrated that the jobs that can be accommodated within SIL uses are compatible with and should be harnessed as a mechanism to support the achievement of ELAAP intentions for Meridian Water.

Q(iv) Could these effects be mitigated by the other SIL designations proposed in the plan? How are these justified? Would the size and position of the other 2 pieces of land render them useful/appropriate for SIL?

Q(v) What is the rationale behind the designation of land at Deepham Sewage Works as SIL? Is this realistic given Thames Water's stated aim of keeping the site operational, what aim would it achieve?

2.14 In paragraph 6 on page 2 of the letter from the Deputy Mayor to Enfield Council (provided at **Appendix 2**), it is clearly stated that

"...the proposed replacement SIL at Deepham's Sewage Works (34 hectares) cannot be considered as additional or new SIL capacity, as the entire site is in use for existing utilities infrastructure. It cannot therefore be considered as compensation for the loss of SIL at Harbet Road..."

Furthermore,

"The three smaller parcels (4 hectares) could provide a contribution to industrial capacity; however there are concerns that these sites would not be an effective replacement for the loss of SIL land at Harbet Road due to their smaller size, lesser accessibility and fragmented nature".

2.15 These comments reflect precisely the concerns raised in section 3 of the Turley 2017 Representation document. The approach to 'mitigation' of loss of SIL at Meridian Water by trying to allocate operational Thames Water land which directly serves the needs of this part of this part of north London is not effective or justified and therefore the parts of the ELAAP which refer to this strategy are not sound.

Q(vii) Does the plan take appropriate measures to support employment uses within the plan area, including those outside Meridian Water?

2.16 For the reasons provided in response to Questions (iv) and (v) the ELAAP does not take appropriate measures to support employment uses within the plan area. The type of employment distinct from SIL uses is unclear and the strategy to support, encourage and provide for this is not evident as an appropriate strategy.

Q(viii) Are the employment policies in the AAP consistent with the aims and objectives of the Local Development Framework?

- 2.17 Paragraphs 2.3 to 2.18 provide an analysis of the existing Development Plan policies relevant to employment development and creation in London, in Enfield and in the Upper Lee Valley. None of the policies advocate the entire removal of SIL. Indeed, Core Policy 37 (Central Leaside) in the Enfield Core Strategy 2010 states that the Strategic Industrial Locations including the Harbet Road estates “will be retained and intensified”.
- 2.18 The employment policies in the ELAAP are not consistent with the aims and objectives of the Local Development Framework/Development Plan.

Q(ix) How will the plan respond to the business needs of existing businesses, within the Plan area?

- 2.19 There is limited confidence that the ELAAP intends to respond to the needs of existing business within the Plan area. The majority of the Stonehill Estate benefits from outline planning permission for the provision of for 46,451 sqm (GIA) of light industrial (B1c), and/or general industrial (B2) and/or storage and distribution (B8) floorspace, at the Stonehill Estate. At the time HSBC owned the land, and secured permission the Submission ELAAP was prepared and Submitted. The ELAAP sought not only the de-designation of the land as SIL, but also the alignment of a Causeway east-west link through the land.
- 2.20 One of the remaining occupiers on the land is Aytans MFG Co UK Limited, who intends to relocate and expand their business at Meridian Water. The land they acquired from HSBC at the Silvermere and Triangle sites for this purpose was not part of the land which HSBC sold to Enfield Council. The Causeway alignment is proposed to run directly through the Silvermere and Triangle sites. If this alignment is fixed in the ELAAP, the Aytans’ expansion plans (granted full planning permission in May 2018) will be put at risk.

Q(xi) Would the wording proposed in policy EL2 be an effective means of achieving the aims and objectives of the Plan?

- 2.21 In short, for the reasons outlined in full in the Turley 2017 Representations and summarised in this Position Statement, the approach and wording in Policy EL2 would not be a sound or effective means of achieving the aims and objectives of the Plan. As a result, the policies in the ELAAP do not accord with the aim of the NPPF, to contribute to a strong, responsive and competitive economy. The suggested changes to resolve the objections are set out in the section below.

3. Changes to the ELAAP to resolve the objections

3.1 The representations previously made by JS an SS Aytan, set out in detail in the Turley representation document dated April 2017 and updated above can be resolved by a number of changes to the emerging ELAAP, as set out below.

Table 1 Requested Changes to the ELAAP to resolve the objections:

Requested Changes

- Re-wording of Policy EL2 and section 5.4 to reflect retention of the SIL allocation within Meridian Water – for at least 50% of the SIL area. If 50% is to be retained, the Stonehill Estate should retain its SIL allocation for reasons that: It benefits from an outline planning permission for SIL-appropriate uses and is more easily accessible to the North Circular. Furthermore, employment buildings can provide a beneficial screening buffer function to residential and other noise-sensitive uses from the environmental effects of the traffic using the North Circular;
- Include reference to the Stonehill Estate under Policy EL15 and policy wording which is supportive and encouraging of redevelopment and enhancement for SIL compatible uses; and
- Revision to the ELAAP Policies Map and Figure 6.1 accordingly.
- The Deephams STW, parcel to the north of Deephams and strips of land to the east should not be regarded as suitable or reasonable replacements for the de-designation of the Harbet Road SIL. The proposed SIL allocation for Deephams STW should be removed as new SIL from draft Policy EL14, the Policies Map, Figure 6.1 and Table 6.2.

3.2 Unless these changes are made, the ELAAP does not accord with the aim of the Framework, to contribute to a strong, responsive and competitive economy. Furthermore, it is unsound with regard to NPPF 2012 paragraph 182 and NPPF 2018 paragraph 35 for reasons that these elements of the ELAAP are not positively prepared, effective or justified.

Appendix 1: Figure 1 Land Ownership at Meridian Water and Causeway Route

 Land acquired by Enfield Council from HSBC, June 2017

 ELAAP 'Safeguarded' Causeway Route

**MAP OF LAND OWNERSHIP
 IN CENTRAL LEESIDE - June 2017**

-  LBE Land (33.14Ha)
-  Hastingswood Estate HSBC Pension Fund (2.95Ha)
Exchanged Contract. Complete June 2020
-  Tesco (4.269Ha)
-  IKEA (8.45Ha)
-  Retail Park – Ravenside Investments Ltd (3.8Ha)
-  Jagtar Singh Aytan - Options (1.12Ha)
-  Arriva Bus Depot
-  LBE Kenninghall Open Space (1.86Ha)
-  LBE Ladysmith Road Open Space
-  GD Metals (2.827Ha)
-  Firat Star Ltd / 1st Bedrooms Ltd.
-  Final Touch (GB Ltd.)
-  Victory Motor Factors
-  Nevill Mirrors Ltd
-  Miah & Sons Ltd.
-  Thames Water
-  Highways Agency / TfL / Thames Water
-  Refuse Incineration Plant - London Waste Ltd.
-  Multiple Unknown Owners
-  Unknown

- Roads Key**
-  TLRN Roads
 -  Principal Road
 -  District Road
 -  Classified Road
 -  Privately Owned

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**Appendix 2: Letter from Deputy Mayor dated 7
July 2017**

Development, Enterprise and Environment

James Gummery
Principal Planning Officer
Planning Policy, Regeneration & Environment
Enfield Council
Civic Centre
Silver Street
Enfield EN1 3XY

Our ref: D&P/LDF10/LDD18/MJ01

Date: 7th July 2017

Dear Mr Gummery

**Enfield Council Local Development Framework: Proposed Submission Edmonton Leaside Area Action Plan (January 2017)
Statement of general conformity with the London Plan (Planning and Compulsory Act 2004, Section 24(4)(a))**

Thank you for your notification of 15 March 2017 consulting the Mayor on the above document and requesting an opinion on general conformity. The Mayor has delegated authority to me to respond. As you will be aware, all development plan documents must be in general conformity with the London Plan under section 24 (1) (b) of the Planning and Compulsory Purchase Act 2004.

On 16 March 2015, GLA officers provided comments (reference: D&P/LDF10/LDD05/MJ01) on the Proposed Submission Central Leaside Area Action Plan (November 2014), which concluded that the AAP was in general conformity with the London Plan. A number of suggestions and other representations to clarify and improve policy areas were set out and discussed with Enfield officers subsequently.

On 12 February 2016, GLA officers provided comments (reference: LDF10/LDD16/MJ01) on the Consultation on a New Local Plan for Enfield 2017-2031 (November 2015), which recognises the scale of change since the adoption of Enfield's Core Strategy in 2010, expected future population growth, major new transport projects, Housing Zone status, and increased housing targets for Meridian Water. The Council has therefore re-drafted the AAP to reflect the new Local Plan, and has changed the document name from 'Central Leaside' to 'Edmonton Leaside', to better reflect the locality. Further discussions on the proposed re-drafted AAP took place between officers in late 2016.

GLA and Enfield officers have engaged in further discussions concerning the Proposed Submission Edmonton Leaside Area Action Plan (January 2017), prior to issuing this letter.

Strategic Industrial Land

London Plan Policy 2.17 highlights the importance of Strategic Industrial Locations (SIL) as London's main reservoirs of industrial and related capacity. Policy 4.4 'Managing Industrial Land and Premises' states that a rigorous approach will be applied to industrial land management to ensure a sufficient stock to meet future needs, and plan, monitor, and manage release of surplus land where appropriate.

The Proposed Submission AAP proposes to release a significant area of SIL, comprising the entirety of the Harbet Road Industrial Estate (18 hectares); with replacement SIL designation comprising Deepham's Sewage Works (34 hectares), and three smaller parcels (4 hectares), resulting in a net increase of 20 hectares. The 2014 Proposed Submission AAP proposed to release only 4.5 hectares of the Harbet Road Industrial Estate SIL, with new designations to compensate, including Deepham's Sewage Works. GLA officers responded (March 2015) that the AAP was in general conformity with the London Plan; however some concerns were raised about the boundary between the retained Harbet Road SIL and the proposed residential uses in the released SIL, although it was noted that conflicting impacts could be ameliorated through careful design.

The greater release of SIL in the current AAP is identified as a result of the increasing need for housing; Housing Zone status; committed transport improvements (West Anglia Main Line and the relocation and expansion of Meridian Water station); and potential transport improvements (4 tracking of WAML, Crossrail 2). This has resulted in an increase to the Meridian Water housing target from 5,000 homes in the 2014 AAP, to the current target of 10,000 homes, with 6,700 jobs.

While the intention to provide increased housing is supported, this needs to be considered against the proposed loss of SIL. Enfield's industrial land release benchmark in the GLA's Land for Industry and Transport SPG is 33 hectares (2011-2031). The GLA's Industrial Land Supply and Economy Study (2015) indicates that 22 hectares of industrial land (SIL, LSIS and non-designated) was released between 2010 (prior to publication of the Enfield's Core Strategy in November 2010) and 2015. The Study also indicates that a further 24 hectares (excluding 18 hectares at Harbet Road) is identified for potential release, primarily through the Upper Lee Valley Opportunity Area Planning Framework (2013), which is considerably above the current London Plan/SPG benchmark. Transport improvements on the West Anglia Main Lane, potentially including Crossrail 2, are expected to lead to further pressure for industrial land release in Enfield.

Evidence in the GLA's recently published London-wide Industrial Land Demand Study also suggests that there will be positive demand for industry and warehousing in Enfield over the period to 2016-2041, reflecting the Borough's strategic advantages for these functions. Harbet Road Industrial Estate benefits from direct access to the adjacent A406 North Circular Road. This access to the strategic road network gives Harbet Road strong qualitative advantages as a location for logistics and industrial development and it plays an important function as part of the wider SIL in this location. It is also noted that the northern half of Harbet Road Industrial Estate was granted outline planning permission on appeal in 2015, for redevelopment to provide up to 46,451 sq.m. of industrial floorspace. This indicates that the site is both viable and attractive for industrial and logistics development. The southern part of the Estate also contains the Harbet Road bus depot, which needs to be located within the Meridian Water Masterplan area in order to support the growth envisaged within the AAP, along with local bus network improvements.

Furthermore, it should be noted that the proposed replacement SIL at Deepham's Sewage Works (34 hectares) cannot be considered as additional or new SIL capacity, as the site is currently in use

for existing utilities infrastructure. It cannot therefore be considered as compensation for the loss of SIL at Harbet Road, which could support 'core' industrial and warehousing/logistics functions. The three smaller parcels (4 hectares) could provide a contribution to industrial capacity; however there are concerns that these sites would not be an effective replacement for the loss of SIL land at Harbet Road due to their smaller size, lesser accessibility, and fragmented nature.

The AAP proposes industrial intensification and opportunities to make more efficient use of industrial land; however considering the recent rate of industrial land release, and the expected demand for industrial space, the GLA cannot support such a large scale loss of SIL until there is full consideration of the potential SIL/industrial land reconfiguration across the whole of the Upper Lee Valley. This is being undertaken as part of the refresh of the Upper Lee Valley Opportunity Area Planning Framework (OAPF), which is expected to be consulted on in early 2018. The OAPF will consider the impact of committed and potential transport improvements. Crossrail 2 is beyond the time period for the AAP; however the OAPF will consider how Crossrail 2 will facilitate the growth anticipated.

Therefore, it is my opinion that the approach to the quantum of SIL and LSIS release and reconfiguration as detailed in Policy EL14 'New Strategic Industrial Locations in Edmonton Leaside' (page 88), and Table 6.2 'New SIL Designated Areas in Edmonton Leaside' (page 87) is not currently in general conformity with the London Plan. However, GLA officers would welcome further discussions with the Council on this matter. Advice to date has indicated that the southern part of Harbet Road SIL may be suitable for de-designation subject to the intensification of industrial and warehousing uses in the northern part of Harbet Road (which would be retained as SIL); however this would be on the condition that the intensified industrial and warehousing uses in the northern part are delivered prior to the de-designation of the southern portion. The current floorspace capacity and areas for servicing in the whole of Harbet Road SIL would also need to be considered against that provided in new multi-level industrial and logistics buildings.

Other comments

Other than the approach to industrial land release, the stated vision and objectives for the Edmonton Leaside area and in particular the Meridian Water Regeneration Area are supported, in line with the London Plan and the Upper Lee Valley Opportunity Area Planning Framework (OAPF). As stated above, GLA officers are currently preparing a draft updated OAPF to better reflect expected future population growth, transport improvements, Housing Zone status, and increased housing targets for a number of areas, including Meridian Water. The Upper Lee Valley offers an opportunity to provide significant jobs and living space to support London's continued growth. It is essential that strategic and local plans are as closely aligned as possible in order to realise this ambition and I welcome the Council's engagement with the Mayor's Planning Unit and Transport for London to ensure this is the case.

The requirement in Policy EL1 'Housing in Meridian Water' to achieve a minimum of 35% affordable housing and work towards a target of 50% is supported; however the wording "to achieve a minimum of 35% affordable housing, measured as a proportion of the total number of units, or in part based upon the proportion of habitable rooms" is unclear and should be clarified.

For clarity it is suggested that an additional map is included showing current SIL and LSIS designations, as in the Proposed Submission Central Leaside Area Action Plan (November 2014).

The proposals for the redevelopment and reconfiguration of the retail units at Ravenside Retail Park, as discussed in Policy EL4 'Ravenside Retail Park' (page 53), are supported; however in line

with the NPPF and London Plan Policy 4.7, this should not lead to an intensification of retail floorspace without application of sequential and impact assessments. It is therefore recommended that Policy EL4 makes this clear.

Policy EL16 'Angel Road Retail Park' (page 97) for employment mixed uses is supported, as is the clause that residential uses will not be appropriate on this site.

The proposal to relocate the Harbet Road Bus Depot, as discussed in paragraph 5.4.19, should be discussed with Transport for London. Further comments from Transport for London are attached as an Appendix.

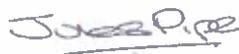
Section 5.11 and Policy EL10 'Urban Grain at Meridian Water' infers that active frontage only relates to non-residential uses; however paragraph 2.3.3 (and Housing Standard 10) of the Mayor's supplementary planning guidance on Housing states that "*active frontages are defined as development frontage on the ground floor where inhabited residential or non-residential uses are located, with a visually permeable elevation (e.g. windows or glazing) and a generous distribution of entrances*". It is therefore recommended that Policy EL10 makes this clear.

Policy EL11 'Building Form at Meridian Water' states that "*no more than 10% of all north facing residential units are single-aspect*"; however Housing Standard 29 of the Housing SPG states that "*single aspect dwellings that are north facing, or exposed to noise levels above which significant adverse effects on health and quality of life occur, or which contain three or more bedrooms, should be avoided*". It is therefore recommended that Policy EL11 reflects this.

Finally, on presentation, it is suggested that all maps in the document should include a key, as some currently have none (Figure 2.3, 2.4, 8.1, etc.). Component parts of the current Meridian Water masterplan are shown (Figure 5.1, 5.2, etc.); however it is recommended that the current masterplan is shown in Section 5.2.

If you would like to discuss any of my representations in more detail, please contact Martin Jones, martin.jones@london.gov.uk , 020 7983 6567, who will be happy to discuss and arrange further meetings.

Yours sincerely



Jules Pipe

Deputy Mayor for Planning, Regeneration and Skills

cc Joanne McCartney, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Lucinda Turner, TfL

Appendix – Transport for London comments

Edmonton Leaside Area Action Plan

TfL supports the objectives of the Area Action Plan. For each of the five objectives the AAP identified where transport plays a part. TfL input into developing these objectives will range from developing best practice via the Healthy Streets approach, growing the bus network and investment in rail infrastructure such as Stratford – Angel Road (STAR) Project and after the plan period Crossrail 2, which needs to differentiate from four tracking. The comments indicate where the AAP should be updated:

Healthy Streets approach

There is an opportunity to update the AAP to reflect currently thinking on the Healthy Streets approach, particularly making sure that the AAP takes account of the 10 Healthy Streets indicators.

The Area Action Plan refers to A406 North Circular Road, which is part of the Transport for London Road Network (TLRN). The one proposal in the AAP is removal of the access ramp with Aragon Way to A406. TfL Technical Approval would be needed.

TfL and the Council will need to work together on any proposals within, over, under or adjacent to A406 to improve connectivity and quality of the environment taking account of the existing nature of this road and functions it will continue to perform.

Bus Network

The AAP is supported by transport evidence that shows how bus and rail network may build up over time. This starts at 5,000 homes and 3,000 jobs, and includes scenarios up to 12,000 homes and 6,000 jobs. However, we expect significant investment will be needed in bus network prior to 5,000 homes, and to deliver 10,000 homes will need Crossrail 2. Therefore, we would include the following projects in Table 14.1

- Early bus network for Meridian Water – Developer contributions, TfL – this should be developed alongside the Meridian Water Highway infrastructure study and Borough-wide service review as well as through individual sites.
- Upper Lea Valley transport modelling and bus priority study – TfL, Enfield, Haringey – this study should be complete later this summer
- Meridian Water to Edmonton Green direct bus link - outcome should define bus infrastructure design and how it fits into the wider bus network.

Crossrail 2

Crossrail 2 is beyond the time period for the AAP; however, to achieve the growth anticipated in the Upper Lea Valley, it is right that AAP considers how Crossrail 2 will facilitate growth in AAP area. Crossrail 2 is project that TfL is promoting, however, it likely to require significant private sector funding to deliver it by 2033.

The previous AAP had a figure of 5,000 new homes (which aligns with what Crossrail 2 assumes in the Do-Minimum Scenario), with the introduction of Crossrail 2 a total of 10,000 new homes could be built on Meridian Water (part of the AAP to the south of the North Circular Road). The AAP should acknowledge that:-

“the introduction of Crossrail 2 could lead to further opportunity for development including sites north of the North Circular beyond the number of homes currently identified in the AAP”.

The AAP needs to be much clearer in explaining the role that Crossrail 2 has to play in facilitating uplift in development since the 2014 AAP.

In addition the AAP needs to differentiate between Crossrail 2 and 4-tracking. They are used interchangeably in the document and instead it needs to be clear that Crossrail 2 can facilitate more housing growth than just 4-tracking alone.

Rail Comments

The AAP development assumed uplift in Public Transport Accessibility Level of 4-6 and 'Urban' character, from a low base – an aim TfL supports. The additional transport provision required to support the increase in housing numbers is not clearly set out in the AAP. The transport assumptions around 4 trains per hour in 2018 and 8 trains per hour in 2022 are not committed.

Table 9 on page 14 refers to STAR trains per peak hour required to meet demand from different levels of development. The STAR service is a 2tph service between Stratford and Meridian Water which will serve the Leaside area. In addition, other Greater Anglia services will stop at Meridian Water and Ponders End which is north of the Leaside area. At present the total frequency of trains calling at Meridian Water is between 2 and 4 per hour and Enfield Council is working with GLA, TfL, Network Rail, Greater Anglia and Department for Transport to try and increase the frequency of calls, perhaps by introducing a shuttle service from Tottenham Hale.

Section 10.1 of the AAP document makes it sound as if there are confirmed plans to introduce these service uplifts. TfL is not aware of any current plans to increase frequency to 8tph from 2022 and further platform capacity is unlikely to be available at Stratford to facilitate this proposal. As noted above 4tph in 2018 is not currently deliverable.

Meridian Water station is due to open in May 2019.

Bus Depot

The Area Action Plan (Para 5.4.19) observes the need to safeguard the bus depot, which is at Towpath Road, in accord with the Mayor's Land for Industry and Transport SPG. TfL will advise the Mayor on whether alternative site is suitable and will need to know it is secured for use as a bus depot before agreeing to loss of bus depot at Towpath Road.

Bus depots are mainly owned and operated by commercial bus companies, who tender to provide bus services to TfL. In areas of employment and residential growth, to ensure the bus network can be delivered at reasonable cost and standards required by TfL we need to retain and expand bus depot capacity, up to 200 unit (buses) site with associated workshops needs to be accommodated locally. This site will need to be operational before the existing facility could close. TfL would expect that planning permission for the alternative site would be secured prior to granting permission for an alternative use of the depot site. TfL recommends incorporating a new bus depot into the Meridian Water masterplan.

There are also wider benefit of retaining bus depot on site to support locally skilled engineering jobs, jobs for drivers, management jobs and other support staff, local suppliers and contractors. TfL is promoting innovation in bus engine technology to reduce air quality and noise impact, as well on board technology. Therefore, skills in the bus industry will change over time, so links to local training and educational institutes should be encouraged.

TfL will not agree to the loss of the bus garage as part of the AAP suggests we might. We will work with the Council to make sure an appropriate bus depot is provided within the AAP area.

Freight and Strategic Industrial Land

Freight is an essential user of the road network which requires Strategic Industrial Land (SIL) in outer London to serve all of London. The Mayor is keen to reduce freight traffic in central London and manage its impacts overall. Protecting warehousing and industrial land close to key growth areas is part of that vision for London.

If SIL is to be released in one part of the city we need to understand where those business activities would take place once the SIL is released, and what effect this would have on services locally and to the rest of London.

TfL recommends that release of SIL needs to be considered at the London wide scale and also linked to strategic changes to transport network beyond the life of this plan.

Water freight

TfL is encouraged that the Council wishes to promote water borne freight within the AAP. The amount of locks and poor water infrastructure within the Borough constrain the development of this mode.

TfL is keen to promote more water freight in London. To do that locally we need to define what kinds of water freight the Council would seek to grow in Edmonton Leaside and the land use and infrastructure implication, for example, Edmonton EcoPark. In the absence of specific types of growth the following actions aimed at growing water based freight are recommended:

- Protect key wharfs and road access to them through the planning process
- Establish a working group with the PLA, potential freight operators, end users and Canal and Rivers trust to grow the Boroughs long term ambitions

Further guidance on freight will form part of new Mayor's Transport Strategy, which is due to be published in May 2017.

Detail comments

In section 1.1 – rail, walking and cycling are mentioned. There should be a mention of how critical bus services will be particularly in providing East-West connectivity and in linking the site to Edmonton.

In objective one (p6) need to include reference to public transport routes.

Para 5.4.19 (p50) – note TfL comments on importance of bus depots in supporting London's growth.

Policy EL6 (p58/9) – TfL recommends the policy should specify that as per 5.8.3 that the Causeway should prioritise Public Transport.

Policy EL7 (p63) should refer to bus standing as well as interchange.

Para 5.8.17 (p64) – should refer to bus standing.

Para 5.8.17 Parking (p65) – good to see such strong stuff on discouraging car parking

Para 11.3 (p120) – add modal shift to public transport too. Public Transport is much more preferable to shared mobility (car clubs, electric private vehicles) so this needs to be emphasised in this para. Section 11.6 (p126-128) – good strong stuff. Clearly notes the importance of services, traffic management,

infrastructure (including drivers' facilities). Policy EL23 should be used as an exemplar for other policies. There needs to be some interaction between walking and cycling policies/ network. The bus network hierarchy might well look like the cycling and walking routes identified in Figure 11.1 (p122)

Table 14.1 (p156) – There are three entries for the bus network in terms of delivery. TfL has appointed Arup to prepare the Upper Lee Valley transport modelling and bus priority study this will identify infrastructure needed to deliver growth in the Upper Lea Valley including Edmonton Leaside.

Transport review - the transport evidence appears to be just discussing parking levels rather than an overall transport strategy. I would however ask how they have calculated the bus movements required. These figures appear to be fairly arbitrary and do not account for where the demands are to/from – e.g. are they to Edmonton/Waltham Forest/Tottenham Hale?

On the maps Ponders End station is too far north.

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