



EDMONTON LEESIDE AAP: STATEMENT IN RESPONSE TO INSPECTOR'S MATTERS, ISSUES & QUESTIONS

MATTER 1 (F, G AND H)

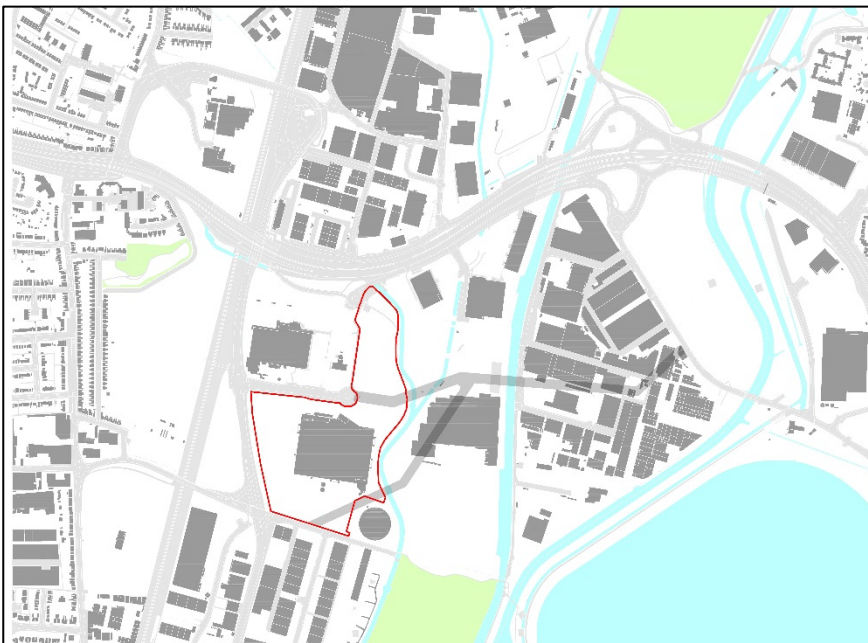
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1 Introduction

- 1.1 This Statement is submitted further to the representations by IKEA Properties Investments Ltd (“IKEA”) to the Edmonton Leaside Proposed Submission Area Action Plan (January 2017) (“AAP”) and, prior to those, the Central Leaside Proposed Submission AAP (November 2014)¹.
- 1.2 IKEA operates an existing furniture and homeware retail store, herein referred to as “IKEA Tottenham”, which lies at the heart of the Meridian Water area. It is a major employer in the area, employing in the region of 600 people directly, of which 80-85% are drawn from the local area/boroughs. It is a long established retail destination, serving north London and beyond.
- 1.3 The store is located to the south of and fronts onto Glover Drive. Customer car parking is provided at surface level, to the north east, and at undercroft level beneath the store. Both car parks are accessed via a service road leading from Glover Drive, which also provides access to a servicing area to the south east of the store. In addition, IKEA owns substantial land to the south, west and east of the store, as shown in the plan at **Figure 1**. The continued visibility and accessibility of the store is key to its successful operation.

Figure 1: IKEA Land Ownership Plan



- 1.4 IKEA are supportive of the overarching principle of the regeneration of Meridian Water, and the London Borough of Enfield’s (‘LBE’) growth ambitions for this area. It is however crucial to the future success of the store that IKEA’s operational needs are not harmed by the proposals within the AAP. IKEA’s representations to date have raised objections to the AAP on two principle grounds:
- a. The overly prescriptive nature of AAP policies as drafted is likely to inhibit the continued operation, visibility and accessibility of the IKEA store (particularly in relation to the Causeway/Boulevard route and design); and

¹ Note: IKEA’s representations to date were submitted by their previous planning advisors, Dalton Warner Davies, and that their role has been replaced by Quod who are now appointed as IKEA’s planning consultants.

- b. The AAP is not underpinned by the requisite transport evidence. 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.
- 1.5 As presently framed, the AAP is not sound and IKEA object to Policies EL2, EL3, EL6, EL10, EL11, EL12 and EL13, various supporting paragraphs and figures, and Chapter 14. Over the past four years, throughout the preparation of the AAP, IKEA have sought to engage with officers at LBE to work collaboratively to address their concerns whilst ensuring the sustainable regeneration of Meridian Water. Progress has recently been made and, without prejudice to matter (b) above, IKEA are now working with LBE to enter into a Statement of Common Ground (SOCG) to address their concerns in relation to point (a) through a suite of modifications to the above policies, paragraphs and figures. Whether these modifications are "Minor" or "Main" will be determined by LBE in agreement with the Inspector. Until these modifications are agreed, IKEA maintain their objection.
- 1.6 The lack of transport evidence (matter b) has not however been addressed and remains as a primary concern to IKEA and a fundamental ground for objection. In addition, IKEA also object to the absence of an Infrastructure Delivery Plan (IDP) to demonstrate how the Council plans for the various phases of development to be funded and delivered. These issues are addressed within the Statements submitted on behalf of IKEA in response to Matter 6 (Transport and Movement), 8 (Infrastructure) and 9 (Implementation), which this Statement should be read alongside.
- 1.7 **In summary, this Statement, along with others made on behalf of IKEA, identify that the AAP fails to provide a sound framework for sustainable development, due to fundamental omissions from the evidence base and Plan itself. In order to remedy this, it is critical that further work is undertaken on the transport evidence to underpin the AAP – without this work the AAP cannot be fully justified or effective – and an IDP is provided to demonstrate that the AAP is deliverable, and ultimately sound.**

2 Matter 1 F, G & H – Modifications, Coverage and Evidence Base

- 2.1 Matter 1 relates to the extent to which the AAP is legally compliant. This Statement specifically considers parts F, G and H in connection with the modifications proposed, the coverage of the AAP and the extent of the evidence base.
- 2.2 IKEA do not propose to appear at the examination in relation to this matter, in the event that agreement be reached on modifications to the AAP, which at the time of preparation are covered in the draft SOCG.
- 2.3 Quod's Statements in relation to Matters 6, 8 and 9 also address, in part, some of the questions raised by the Inspector in relation to Matter 1 and cross reference with these Statements is necessary.

F. Modifications to the Plan

i. Is the Council proposing any Main Modifications that are being considered as part of this Examination?

- 2.4 As presently framed, the AAP is not sound and IKEA object to Policies EL2, EL3, EL6, EL10, EL11, EL12 and EL13, various supporting paragraphs and figures, and Chapter 14, as the current drafting would adversely affect IKEA's operational needs (see below and Statements in response to Matters 2, 3, 4, 6, 7, 8 and 9 for full details). To help address this, IKEA are working with LBE on a suite of proposed modifications to the AAP via an SOCG, until these modifications are agreed, IKEA maintain their objection.
- 2.5 These changes are proposed to address IKEA's concerns in relation to the overly prescriptive nature of a number of the proposed policies, paragraphs and figures. For example, modifications are now proposed which confirm the Causeway/Boulevard design and route are indicative and the need for and its alignment will instead be considered within the forthcoming Meridian Water Masterplan.
- 2.6 The proposed modifications to which the emerging SOCG relates are being formulated 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 policies. This is without prejudice to IKEA's outstanding objections in relation to the absence of transport evidence (addressed below) and an IDP.
- 2.7 Whether these modifications are minor or main will be determined by LBE in agreement with the Inspector.

ii. Are any further Main Modifications likely to be advanced during the Examination?

- 2.8 See above.

iii. Are there any further Additional/Minor Modifications proposed?

- 2.9 See above.

iv. Could the Council keep an up to date schedule of all Main Modifications during the Examination and provide me with a final copy of this schedule after the Hearings sessions have been completed?

- 2.10 No comment.

G. Coverage

i. Are there any policies in the Plan that do not accord with the National Planning Policy Framework or advice in the Planning Practice Guidance?

- 2.11 Yes.
- 2.12 It is a fundamental principal of the plan making system, as recognised in the NPPF, that the preparation of plans, and their policies, should be “...underpinned by relevant and up to date evidence” (paragraph 31). The importance of that evidence is clear, as it is necessary to demonstrate how a Plan has addressed relevant economic, social and environmental objectives, and where adverse impacts are identified, alternative options with less impacts should be considered (Paragraph 32). This evidence is also necessary in order to determine that where impacts are unavoidable, suitable mitigation and strategies can be proposed, where they are possible.
- 2.13 Neither this, nor the following requirements of Paragraph 35 of NPPF, have been met by the draft AAP:

“Plans are ‘sound’ if they are: ...

b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground”.

- 2.14 No assessment of reasonable alternatives has been undertaken in the case of transportation aspects of the Plan. Throughout the preparation of the AAP, IKEA have raised significant concerns in this regard in relation to the prescribed route of the proposed Causeway/Boulevard (Policy EL6). To address this, as noted above, IKEA are currently working with LBE to enter into an SOCG to agree to modifications to the Plan such that at this stage the Causeway/Boulevard route as only indicative and its alignment will instead be assessed and considered as part of the emerging Meridian Water Masterplan, following the conclusion of highways modelling. Until this modification is made, IKEA maintain their objection to this element of the AAP.
- 2.15 There is no evidence to demonstrate, in transport terms, that the area is able to sustainably accommodate the 10,000 homes and 6,000 jobs proposed (Policies EL1 and EL2) or the Causeway/Boulevard (Policy EL6). The AAP is not underpinned by the requisite transport evidence.
- 2.16 The AAP (pages 130-131) notes that the existing highway network is “near capacity” as it presently operates, and detailed modelling is required to understand the necessary infrastructure and the quantum of development to be delivered at Meridian Water. It is clear from the AAP that its strategy, given the current uncertainty on transportation implications, is without foundation.
- 2.17 In a recent meeting with LBE (3 September), IKEA were informed that the Council intend to begin the modelling work in April 2019, and this will take 6-9 months to complete.
- 2.18 Consequently, determining a spatial strategy, including a quantum of development and transportation strategies is entirely premature in a vacuum of transport modelling evidence.

- 2.19 Without this, it is not possible to demonstrate that the Plan is deliverable over the plan period or that adverse impacts upon the continued operation, visibility and accessibility of the IKEA store will not be caused. The AAP is therefore neither fully justified nor effective in this regard and cannot provide a sound strategic framework for sustainable development.
- 2.20 Whilst IKEA are supportive of the overarching principle of securing optimal housing densities and job provision in Meridian Water, the levels proposed are untested, and the Plan is not underpinned by a soundly formed transport strategy. The lack of this evidence base is of significant concern to IKEA and remains a fundamental ground for objection.
- 2.21 Full details in this regard are set out within the Statement (by Pell Frischman) submitted on behalf of IKEA in response to Matter 6 (Transport and Movement).

ii. Are there any policies in the Plan that do not accord with the Adopted Development Plan, including the London Plan?

- 2.22 Yes.
- 2.23 Core Strategy Policy 38 (Meridian Water) requires the delivery of 5,000 new homes and 1,500 new jobs in Meridian Water, whereas draft Policies EL1 and EL2 of the AAP propose to double these numbers to 10,000 new homes and 6,000 new jobs. As outlined above, the scale of growth, whilst not objectionable in principle in light of housing and employment needs, is presently unsupported by the necessary transport evidence.
- 2.24 It has not been demonstrated that draft Policies EL1, EL2 and EL6 (The Causeway/Boulevard) accord with the following London Plan policies, which support optimal development densities provided that they are supported by the necessary infrastructure to sustain that level of growth:
- **London Plan 2016:**
 - Policy 2.13: Opportunity Areas and Intensification Areas (Part B (b))
 - Policy 3.4: Optimising Housing Potential
 - **Draft London Plan (August 2018):**
 - Policy SD1: Opportunity Areas (Part A (1) (a-b) and Part B (3))
 - Policy D6: Optimising Housing Density (Part A (1-3) and Part B (1))
- 2.25 The lack of transport evidence is a major omission and area of non-compliance – the AAP has not been demonstrated to be deliverable and is fundamentally unsound on this basis. A full assessment of these issues is provided within the Statements submitted on behalf of IKEA in response to Matters 6 (Transport and Movement), 8 (Infrastructure) and 9 (Implementation).

iii. Are there any policy omissions in the plan which would compromise soundness? Have any other policies been considered and discounted?

- 2.26 See response to G (i) above with regard to alternatives.

H. Evidence Base

i. Is the evidence base in relation to housing, employment and flood risk up to date?

- 2.27 No comment.

ii. Are there any important developments/changes since the submission of the Plan?

2.28 No further evidence has been submitted since the submission of the AAP.