



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

MATTER 8 (INFRASTRUCTURE)

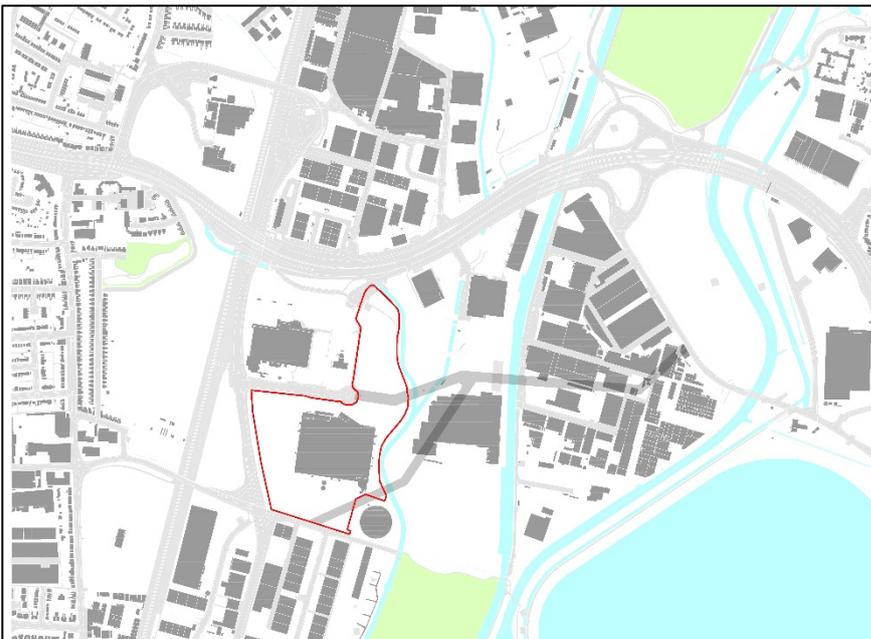
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1 Introduction

- 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 support 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to date were submitted by their previous planning advisors, Dalton Warner Davies, and that their role has been replaced by Quod who are now appointed as IKEA’s planning consultants.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 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. Whether these modifications are "Minor" or "Main" will be determined by LBE in agreement with the Inspector.
- 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) 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 8 – Infrastructure

- 2.1 It is key for a Development Plan to be effective that its objectives are deliverable over the Plan's period. In the case of this AAP, which seeks to deliver an ambitious growth programme, involving a significant provision of new homes and jobs, it is essential that the required infrastructure to support the growth is (i) identified, (ii) planned and (iii) programmed.
- 2.2 IKEA do not wish to comment on the general infrastructure (eg community, education, health, etc) to support this level of growth, but do so in respect of transport infrastructure.
- 2.3 IKEA's views on the transportation aspects of the AAP are clear from their comments in other Position Statements, notably those in respect of Matters 1 and 6. In the absence of any transport modelling, it is not possible to identify highway and transport infrastructure requirements for this scale of development.
- 2.4 For those reasons outlined in the Position Statement of Matter 9, it is not possible to determine an appropriate transport implementation strategy, in the absence of any evidence on the transport implications of the Plan.
- 2.5 The transport vision for the AAP is articulated in Part C of the Plan. Transport is recognised by local businesses as a key issue in the AAP area (see paragraph 11.1.3). The scale of development proposed in the AAP is likely to exacerbate transport issues in the area unless it is carefully planned. Whilst IKEA support the objectives of improving pedestrian and cycling, the bus network and services, and the use of water based transport, as well as the future improvements to the rail infrastructure, there is scant information on the necessary highway infrastructure improvements and what is proposed is in the absence of any appropriate evidence.
- 2.6 The AAP recognises that even without any development at Edmonton Leaside, traffic levels on the highway network are already at or near capacity, and further pressure is likely to arise (paragraphs 11.9.4 and 11.9.5). Further development in the AAP area will have an impact on this highway network, although the scale of that impact has not yet been tested. Presently, it is not, therefore, possible for the AAP to identify the highway infrastructure requirements. This is recognised in the AAP, given there are no specific highway infrastructure projects, other than for a proposed new east/west connection of the Causeway.
- 2.7 In the absence of any demonstration of highway infrastructure requirements, it is not possible to determine whether the AAP is deliverable or not.
- 2.8 The only reference to highway infrastructure projects within the Plan is the project described as the "Meridian Water Highway Infrastructure" (incorporates walking and cycling route R1 from the AAP) at Table 14.1. There is scant information on the delivery and implementation of this infrastructure. The Plan merely states that all development zones within the AAP will be responsible for its delivery, and that the lead agencies for its delivery are shared between LBE/TfL/private sector.
- 2.9 In summary, the transportation aspects of the Plan are not justified or effective, given that there is no evidence supporting the transport vision, and it is unclear whether the transport vision can be delivered over the Plan period.

i. Would the policies in the plan make adequate provision for future needs for:

- a. Healthcare (including mental health provision, GPs and secondary care)*
- b. Education*
- c. Sports and open space*
- d. Other community uses and infrastructure*

Are the assumptions made about “dual-use” realistic and achievable?

2.10 IKEA do not wish to make any specific comments on this matter.

ii. Is the plan based on realistic assumptions in relation to the capacity to provide supporting infrastructure at higher densities? What is the justification for the standards used in the scenario testing?

2.11 IKEA do not wish to make any specific comments on this matter.

iii. Does the plan make adequate provision for water infrastructure including wastewater? Would any of the policies compromise the operations of infrastructure providers?

2.12 IKEA do not wish to make any specific comments on this matter.

iv. Does the plan make adequate provision for waste? It is consistent with local and national policy for waste?

2.13 IKEA do not wish to make any specific comments on this matter.

v. In relation to the Eco-Park, does the policy need to be updated to reflect the DCO? How does it accord with local and national plan policy?

2.14 IKEA do not wish to make any specific comments on this matter.

vi. In relation to Lee Valley Heat Network, is policy EL26 justified? How does it accord with local and national plan policy? Is it too prescriptive? Does the involvement of LBE as a stakeholder in “Energetik” leave the policy unsound?

2.15 IKEA do not wish to make any specific comments on this matter.

vii. Would the wording proposed in the relevant Plan policies be an effective means of achieving the aims and objectives of the Plan?

2.16 For the reasons outlined at the beginning of this Section, it is IKEA’s views that the policies do not create an effective means of achieving the transport aims and objectives of the Plan.

viii. When looking cumulatively at the scale of obligations and policy requirements, are the sites and the scale of development identified in the Plan viable and deliverable?

2.17 Policy EL13 outlines the infrastructure requirements of the AAP, but excludes any highway infrastructure. The infrastructure required under Policy EL13 is, however, not defined in terms of specific requirements, but merely generic topics (eg, affordable housing, education, etc). In relation to transportation issues, for example, there is no indication of the level of enhancement required to the bus networks, despite this being a matter to be covered via a financial contribution.

- 2.18 Whilst Policy EL13 recognises that CIL Regulations prevent pooling of Section 106 obligations beyond five, the AAP is not clear how this will be achieved if the development of Meridian Water comes forward in 8 phases (as indicated). For example, in the case of improved bus services, it is one of the main projects of the plan to improve bus services focused on the Lee Valley corridor and orbital links, and it is expected that all development zones will make a contribution towards these improvements. However, where such obligations are sought from the first five phases of development, then any remaining phases of development cannot be obligated to make a contribution towards this project.
- 2.19 Given the scale of obligations and policy requirements are unclear, it is not possible to determine if the scale of development identified in the Plan is viable and deliverable, regardless of any other development costs.
- 2.20 IKEA's response to questions on Matter 9 comments further on delivery and implementation of infrastructure.