

**BY SPECIAL DELIVERY**

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Our Ref KJ.M-00555415  
Date 21 September 2020

Dear Sirs

**The London Borough of Enfield (Meridian Water Strategic Infrastructure Works)  
Compulsory Purchase Order 2020 ("the Order")**

**Our clients: IKEA Properties Investments Limited, IKEA Limited, IKEA Leasing Limited and  
Commerzbank Aktiengesellschaft – IKEA Store, 6 Glover Drive, London N18 3HF  
Plots: 2,4,5,8, 9,10,11,13,15,16,17,18,19,20,35,36,38,40,73,74,92, 94, 95,96,97,98,99 and 100**

We are instructed by the above named clients in relation to the Order. We write to register our clients' objection to the inclusion of their land and interests in the Order and to request that the Order is not confirmed in its current form.

IKEA is a multinational business operating out of 381 stores across the UK and elsewhere. Since its opening in 2005 the Edmonton Store has become a successful store currently employing 432 staff on site which supports the wider economy and the livelihoods of those working in the store.

**Impact of the proposals**

Whilst we appreciate that in the long term the scheme underlying the acquisition will result in a regeneration of the area the initial impact caused by the infrastructure works on local businesses will be considerable. In respect of IKEA interests these include the closure of important car parking facilities, reconfiguration of traffic and pedestrian flows within the site and the store and a potential, significant loss of trade (with the consequential impact on our customers and employees). IKEA is a key employer in the area, and this interruption in our trading ability could have a serious impact on the livelihoods of many local families. These short and long terms impacts on the store have not been considered in any way in the Council's decision to make the Order, and are not addressed in the accompanying Statement of Reasons.

**Objection**

From the limited information available to us in the Statement of Reasons, our clients' initial objections to the confirmation of the Order can be summarised as follows:



## **1.0 Insufficient steps to acquire the land by agreement**

In order to justify the use of compulsory purchase powers the Council is expected to demonstrate that they have taken reasonable steps to acquire the land by agreement. To date, the Council has not taken any such reasonable steps and has not discussed with our clients any proposed terms for acquisition of the required land and interests by private treaty.

Whilst our clients and their agents, Savills, have responded to requests made by the Council for information, the Council has failed to provide the details requested by our clients and Savills so that we are able to properly understand how the proposals will affect the store, during the construction and operational phases. This is despite numerous requests by our clients, and Savills, for this information.

The proposed land acquisition will sever the IKEA northern car park from the store and there is no obligation through the Council's planning application (reference 19/02717/RE3) for a replacement car park to be provided in advance of the northern car park being severed, and consequently becoming impractical for use by IKEA. The Council have failed to address this fundamental issue in their proposals, or provide our clients with clarification as to how this disconnect in car parking provision is to be overcome.

## **2.0 Impediments to delivery**

With regards to the recent decision by the Government to introduce lockdown measures during the Covid Pandemic, the issues raised by the Brexit process and the fact that the Country is facing a considerable recession, our clients are concerned about the overall viability of the scheme, and again this issue is not adequately addressed by the Council in the Statement of Reasons. These risks are amplified when considering the upfront infrastructure costs, the quantum of development to be delivered in later phases and the generally low values at present.

It would be our view that the economic case has not been made for delivery of this scheme in its totality.

## **3.0 Insufficient information available**

Despite the Council's assertion it has "engaged" with landowners, very limited information has been made available to our clients or Savills about the proposed scheme, when their land would be needed and particularly at what point the main impacts to the car parking would be felt. More could be done to further alleviate the concerns of major and local business in the area, particularly due to the level of proposed disruption to arterial routes.

## **4.0 Alternative options not properly considered**

The Council has failed to demonstrate what alternatives (if any) have been considered and/or already discounted. Until justification is provided it is difficult to ascertain whether there are suitable alternatives to compulsory acquisition, whether the land is actually needed or whether a lesser area could be acquired to achieve the same effect. As an example, the proposals include the considerable acquisition of rights to deliver the improvements to the Pymmes Brook which are excessive and do not deliver an uninterrupted route along the river or further access across the river corridor.

It is our clients' position that their land and interests should not be acquired and that the Order is not capable of being confirmed in its current form. Confirmation of the Order in its current form would not meet the requisite legal tests and would be susceptible to legal challenge.

We reserve the right to amend, add to or withdraw this objection.

We would be most grateful for you to confirm receipt of this objection letter.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Shoosmiths', written in a cursive style.

**SHOOSMITHS LLP**