

Jacqui Glover
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 Edmonton Leaside Area Action Plan Examination

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Our Ref KJ.M-00611847
 Date 7 September 2018

Dear Ms Glover

Draft Edmonton Leaside Area Action Plan ("AAP") – Our clients: IKEA Properties Investments Ltd ("IKEA")

Our above named clients have submitted representations to the AAP, and are presently intending to appear at the Examination next month.

IKEA support Enfield Council's aspirations to regenerate this part of the Borough, and most notably the Meridian Water area. Their representations to the AAP however concern the potential implications of the AAP on the Company's existing operations. For the reasons outlined in previous representations, which the Inspector will be familiar with, IKEA are concerned with the detrimental effect the AAP could have on the store's existing operations (in terms of customer access, car parking, servicing and store visibility).

The representations are primarily founded on the lack of a sound evidence base on transportation matters, and consequently the lack of a sound and justified transport strategy for Meridian Water.

For the reasons outlined below, my client is strongly of the view that Examination of the AAP is premature, and we are seeking a deferral of the Examination until a sound transport evidence base has been prepared, and a justified transport strategy identified. In the absence of this evidence base, it is clear that the AAP would not be sound, and any adoption of the AAP based on the existing inadequate evidence base would be susceptible to legal challenge.

Background

The adopted Core Strategy (2010) ("CS") recognises the Edmonton Leaside Area as one suitable for strategic growth, and capable of delivering up to 5,000 new homes and 3,000 net additional new jobs.

Since the adoption of the CS, the AAP has identified a more ambitious growth strategy to deliver double the housing and new jobs (ie, 10,000 new homes and 6,000 new jobs).

Whilst IKEA support the AAP growth strategy in principle, it is not informed by an evidence based multimodal transport strategy and has been developed without any substantive transport modelling. Consequently the spatial strategy is not supported by any objective evidence. Simply put, we therefore currently do not know if the quantum of development now included in the AAP is deliverable as we have no information about the impact of this quantum of development on both the local transport and highway network, and whether it would be possible to undertake improvement and mitigation works to the degree necessary to render the development acceptable in planning and highway terms.

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 found, identify alternative options with less impacts that should be considered. This evidence is also necessary when unavoidable impacts are identified and there is a need to consider suitable mitigation measures and strategies.

Transportation Matters relating to the AAP

IKEA have been in long standing dialogue (over the last 4 years) with Enfield Council Officers on the lack of technical work including highway layout and transport modelling, and consequently the uncertainty of the impacts of the AAP's growth aspirations on the highway network, and more specifically the transport strategy of the AAP. Notably, in respect of IKEA's concerns, the AAP promotes a new east/west access (referred to as The Causeway), albeit the operation and detailed alignment of this access is yet to be determined. IKEA have identified the potential adverse implications of this east/west access on their operations, and as a consequence, Enfield Council have confirmed their agreement to modifications to the Plan which clarify that the route is presently indicative only.

The AAP (pages 130-131) acknowledges 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, no modelling has been provided to date that demonstrates that this can be achieved. It is clear from the AAP that its strategy, given the current uncertainty on transportation implications, is, without any foundation.

In a recent meeting with Enfield Council (3 September 2018), IKEA were informed that the Council intend to begin the transport modelling work in April 2019, and this will take 6-9 months to complete.

Consequently, determining a spatial strategy, including a quantum of development and transportation strategies, is entirely premature in a vacuum of transport modelling evidence.

Remedies

In order to remedy this current situation, and to ensure that the spatial strategy of the AAP is not unsound, it is necessary for (i) the transport strategy to be clarified, (ii) the transportation modelling to be undertaken and, thereafter, (iii) the infrastructure requirements defined. Without this staged approach, the AAP must clearly be found unsound.


In view of the above, we are of the strong opinion that the Examination of the Plan should be deferred, until the transport strategy has been developed, the modelling has been undertaken and the infrastructure identified, and we are, therefore, seeking the Inspector's agreement to this approach.

We are hopeful that the Inspector concurs that, whilst the need for additional homes as well as jobs is important to London, it is not in the interests of good planning to proceed with the Examination at this stage given these aspects of the Plan go to the very heart of its soundness.

We note from the Inspector's issues under Matter 6 that she has questions on the transportation aspects of the Plan, and if the Inspector needs further information on these aspects to determine whether to defer the Examination, we would strongly urge a preliminary meeting is convened at which these aspects can be discussed.

We await the Inspector's response on this matter.

Yours sincerely

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