



## **EDMONTON LEESIDE AREA ACTION PLAN**

### **EXAMINATION**

#### **FINAL**

### **Hearing Position Statement**

#### **Matter 7: Retail Uses**

Issue: Does the plan make appropriate provision for retail uses and provide positive policies which support the vitality and viability of town centres?

##### **i. Does the retail provision proposed adequately meet the projected needs of the future population? Is Policy EL3 consistent with national guidance in this regard?**

Yes, the retail provision proposed adequately meets the projected needs of the future population. The Meridian Water Spatial Scenario testing, whose results appear in the AECOM report 'Evidence on Housing and Supporting Infrastructure' (November 2016) tested multiple future residential growth and spatial scenarios and, for each one, applied a projection of retail need in line with best practice.

The AECOM work, which forms part of the evidence base for the AAP, based its conclusions on the most up-to-date evidence- LBE's Retail and Town Centre Study (2014). The Retail and Town Centre Study found that the closest district centres to Meridian Water are Upper Edmonton and Lower Edmonton Green.

Basing its conclusions on an assessment of the current supply and future demand for comparison and convenience goods floorspace in the Borough, the Retail and Town Centre Study forecast there is scope to develop an additional 14,400sqm (gross) of A1 convenience goods floorspace, 38,200sqm (gross) of A1 comparison goods floorspace and 13,300sqm (gross) of A3-A5 class floorspace in LBE between 2014 and 2029.

To calculate gross retail floorspace demand, the AECOM study sourced leakage rates and expenditure per area of floorspace assumptions from the Retail and Town Centre Study (2014). Expenditure per type of good figures were sourced from the GLA's Consumer Expenditure and Comparison Goods Floorspace Need in London Summary Report (2013) which analyses expenditure at a London wide level, used as this was considered to be a more accurate representation of future Meridian Water residents than Enfield figures.

The expenditure figures were multiplied using population yields to determine total gross expenditure figures by goods type. Leakage rates (convenience goods 70%, comparison goods 90% and food and beverages 70% respectively) were then applied to estimate how much of the gross expenditure would remain within Meridian Water, generating figures for net total expenditure. Expenditure per sqm of floorspace types were then applied to the net total expenditure figures to calculate the total areas of retail floorspace (first as gross external area, then discounted appropriately to determine net internal area) projected by dwelling scenario and by dwelling size mix.

The AECOM study concluded with a robust calculation of retail floorspace ranges (39sqm to 169sqm per hectare of developable land, depending on development scenario). The GLA was consulted on the study and raised no objection to its methodology or conclusions on retail projection in its Regulation 19 submission.

In terms of meeting the needs of the future population, retail also offers employment as well as goods and services. The new retail proposed at Meridian Water will provide hundreds of new FTE jobs, and will thus also help meet the economic needs of the future population. It has been calculated that new retail jobs would account for between 6 and 12% of all new jobs created at Meridian Water.

National guidance on planning for future local needs and/or for retail comprises:

- Paragraph 11 of the NPPF, which states that plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that plans should positively seek opportunities to meet the development needs of their area;
- Paragraph 20 of the NPPF, which states that strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for retail; and
- Paragraph 85 of the NPPF, which requires planning policies and decisions to support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should promote the long-term vitality and viability of town centres – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters.

Reviewing these NPPF requirements, it is considered that Policy EL3 is entirely consistent with them. In terms of paragraph 11, it positively seeks opportunities to meet the development needs of the Edmonton Leaside area through the provision of new retail and complementary town centre uses. In line with paragraph 20, it defines a strategy for the pattern, scale, quality and general provision of retail; and on paragraph 85, it takes a wholly proactive, positive approach to the growth and management of the new Meridian Water town centre. It enables the centre to be responsive to rapid changes in the retail industry through encouraging multiple smaller rather than single larger units. It promotes long-term vitality and viability by seeking new retail fronting onto the most accessible parts of the Causeway, around the railway station, and on waterfronts. Finally, policy EL3 seeks smaller and independent shops, consistent with paragraph 85's call for distinctiveness and diversification.

Alongside its consistency with national guidance, the soundness of Policy EL3 is further enhanced through having appropriate regard to a wide range of more local policy, evidence and guidance on retail planning, including within the London Plan, the Upper Lee Valley Opportunity Area Planning Framework, the Enfield Local Plan, and the Enfield Retail and Town Centre Study (2014).

## **ii. Would greater provision undermine nearby district centres?**

It is not considered that greater retail provision would undermine nearby district centres. This is made clear from the start of the Plan (Objective 2- Facilitating Economic Growth, which states that a new town centre will be delivered at Meridian Water without undermining the primary retail function of nearby district centres) and the Plan remains consistent on this point throughout.

Paragraph 5.5.2 provides further detail by noting that the Council expects the new retail centre to complement rather than compete with the surrounding district centres, not just of Enfield but also in Haringey. Edmonton Green is subject to significant regeneration efforts, including comparison floorspace delivery, and across the borough boundary south into Haringey both Tottenham and Northumberland Park will also undergo significant investment and regeneration during the plan period.

Restaurants, bars, small-scale independent shops and cafes, either on waterfronts or within pedestrianised precincts, do not appear as distinctive features within the nearby district centres. However, as set out in Policy EL3, all of these features will be crucial for the retail offer at Meridian Water. In this sense, the qualitative sense of place and street scene of the Meridian Water town centre (as illustrated in the AAP document) will be very different from the existing local offer. As such, there will clearly be a great degree of complementarity rather than competition with or undermining of nearby district centres.

The AAP provides further safeguards relevant to answering this question: for example, Policy EL3 requires that development proposals for A-Class uses which, cumulatively, would lead to provision greater than 2,000 square metres, must demonstrate evidence that there would be no adverse effect on neighbouring centres and would be in proportion to the growth in local demand.

Likewise, paragraph 5.5.4 notes that any development in Meridian Water over and above that set out in the AAP should be supported by an up to date retail study or similar document demonstrating need, and would have to be developed through a phased approach that would not harm the vitality and viability of other centres. Additionally, paragraph 5.5.8 states that the town centre will need to provide for small and independent shops in accordance with DMD 29. Affordable floorspace should be provided to help maintain and enhance the centre's social and economic offer.

## **iii. How do the aspirations for Ravenside Retail Park accord with the aims and objectives of the Meridian Water Masterplan?**

The aspirations for Ravenside Retail Park are for its reconfiguration to improve urban design through active frontages, public realm improvements, integration with the existing and planned urban grain at Meridian Water and other areas of the AAP, increased pedestrian accessibility, minimised surface car parking, and improved green landscaping, all of which would greatly enhance the quality and appearance of the area.

These aspirations are based on the evidence that Ravenside Retail Park continues to fulfil an important function locally (in line with the findings of the 2014 Retail and Town Centre Study). Paragraph 5.6.2 of the AAP notes that it plays a role in the borough's retail hierarchy and provides an out-of-town retail function. Additionally, paragraph 5.6.3 notes London Plan support for the positive

contribution that out of town retail parks can have where they complement and do not compete with town centres, in part through offering comparison retail for bulky items.

All of this evidence suggests that Ravenside Retail Park, like other existing retail businesses in Meridian Water, should be retained and enhanced through redevelopment. The design and access improvements proposed, which will be subject to more detailed masterplanning, are entirely consistent with the overall aims and objectives of the AAP to achieve a step change in the quality of the urban environment and to regenerate a major under-performing, underused, largely brownfield site.

Specifically, the approach to Ravenside Retail Park, as set out in Policy EL4, accords with Objective 1 of the AAP (Building a sustainable urban neighbourhood, in part through embodying the principles of good design to ensure a robust relationship between a variety of uses and activities, high quality public realm, and intuitive movement patterns). It also accords with Objective 2 (Facilitating Economic Growth) through aiming to increase employment opportunities and capitalise on increased public transport accessibility and customer base at Meridian Water. Finally, it accords with Objective 3 (Connectivity) through improving access, and utilise the blue for pedestrians and cyclists with better routes and connections within Edmonton Leaside.

As such, the aspirations for Ravenside Retail Park accord clearly and directly with the aims and objectives of the ELAAP.

**iv. How will the de-designation of Angel Road Retail Park achieve the objective of supporting employment provision in Edmonton Leaside? Are there any disadvantages from doing so?**

The de-designation of Angel Road Retail Park, which is in line with London Plan policy 2.15, will achieve the objective of supporting employment provision in Edmonton Leaside by developing a large new area of mixed employment provision in a location less suited to retail due to poor accessibility (the only direct access for pedestrians is a footbridge across the North Circular Road).

As noted by AAP paragraph 7.3.3, de-designation will support employment provision by allowing the development of a more integrated, consolidated area safeguarding important employment opportunities at Eley Estate and the wider SIL area.

New development of commercial spaces could cater for small businesses and support ancillary uses to strengthen the vitality and viability of other employment uses. Small scale walk to services could be introduced, such as a workplace crèche or café, which meet the essential day to day needs of the industrial occupiers. Policy EL16 specifically qualifies support for employment mixed use in this location only where it will support the vitality and viability of the existing Eley Estate and contribute to a net overall increase in jobs.

Inevitably, there is a disadvantage of de-designating Angel Road Retail Park, which is that some loss of retail jobs could occur. However, it is clear that the number of retail jobs in this relatively small retail park has shrunk in recent years; for example, one large formerly retail unit has been converted to a banqueting hall.

**v. How will the plan respond to the business needs of existing retail operators within the Plan area?**

The main existing retail operators within the Plan area are Ikea, Tesco and the businesses at the Ravenside Retail Park, between them providing approximately 1,100 retail jobs and thus making a

crucial contribution to the local economy. The Plan will respond to the business needs of existing retail operators within the Plan area in a number of ways.

Firstly, the strategic road infrastructure in the local area is a key factor driving its attractiveness to retail uses, and the Plan seeks to retain and enhance that road connectivity, in part through appropriate upgrading of Glover Drive as the westernmost section of the Causeway (Policy EL6).

Secondly, it is recognised that existing retailers have successful businesses operating within the area identified for the Meridian Water regeneration. As the Meridian Water development progresses, the Council are aware that maintaining successful operations as regeneration progresses will be very important. Issues such as maintaining store visibility, and the quality of the customer journey and continuation of servicing and deliveries are important retail issues whilst also meeting the objective of delivering a successful new urban neighbourhood centre. It is also recognised that retail needs are changing and will continue to change over the lifetime of the Meridian Water and that, as such, solutions need to be flexible and capable of adapting over time.

Additionally, the Council is progressing a Statement of Common Ground with IKEA and exploring minor modifications to address as far as possible the existing operational requirements of retail operators.

Policy EL11 provides for the modification and adaptation of buildings and layout, including those of existing retail operators, so that they support comprehensive regeneration. In this sense, the Plan strikes an appropriate balance between comprehensive regeneration while still recognising the importance of the business needs of existing operators.

While this text is relevant to Ravenside Retail Park just as much as it is for IKEA and Tesco, for more details in terms of responding to the business needs of operators at Ravenside Retail Park, see the answer to iii) above.

**vi. Would the wording proposed in policies EL3 and EL4 be an effective means of achieving the aims and objectives of the Plan?**

Yes, it is considered that the wording proposed in policies EL3 and EL4 would be an effective means of achieving the aims and objectives of the Plan.

Policy EL3 (the provisions of which are discussed in more detail in our answer to i above) is considered an effective way of meeting the following specific aims and objectives of the AAP:

- Objective 1: Building a Sustainable Urban Neighbourhood, specifically:
  - Deliver thousands of new homes in Meridian Water (by developing a town centre to meet the day-to-day needs of new residents);
  - Embody the principles of good design to ensure a robust relationship between a variety of uses and activities, high quality public realm, and intuitive movement patterns (Policy EL3 seeks to embed these design requirements within the new town centre)
  - Enable distinctive place-making by maximising the local identity and character (through, for example, seeking smaller, independent shops, and maximising sense of place and character through use of waterfront development).
  
- Objective 2: Facilitating Economic Growth, specifically:
  - Deliver a new town centre at Meridian Water with an appropriate mix of uses without undermining the primary retail function of nearby district centres (see also answer to ii above);

- Objective 4: Delivering Sustainable Regeneration, specifically:
  - Promote low carbon living and working (by ensuring a town centre accessible by and built around modes of transport other than the private car); and
- Objective 5: Celebrating the Lee Valley Waterways and Open Spaces
  - Use the watercourses and waterways to enable distinctive place-making, especially Meridian Water (the policy specifically references the potential contribution that the area's waterfronts can make to the distinctiveness of the town centre).

Policy EL4 (the provisions of which are discussed in more detail in our answer to iii above) is considered an effective way of meeting the following specific aims and objectives of the AAP:

- Objective 1: Building a Sustainable Urban Neighbourhood, specifically:
  - Deliver thousands of new homes in Meridian Water (and retaining existing retail to meet some of the retail needs of those new residents);
  - Embody the principles of good design to ensure a robust relationship between a variety of uses and activities, high quality public realm, and intuitive movement patterns (Policy EL4 seeks improvements in the design quality of Ravenside Retail Park along these lines)
- Objective 2: Facilitating Economic Growth, specifically:
  - Ensure Edmonton Leaside is attractive to regional, national and international investors in order to deliver thousands of new jobs across the area (Policy EL4 will improve the attractiveness not only of Ravenside Retail Park but of Meridian Water as a whole)
  - Ensure that employment opportunities are accessible and local residents are supported in increasing their skills and qualifications to progress into work (the accessibility of employment opportunities at Ravenside Retail Park will be improved)
- Objective 4: Delivering Sustainable Regeneration, specifically:
  - Promote low carbon living and working (by ensuring Ravenside Retail Park is accessible by modes of transport other than the private car); and
  - Provide sustainable movement and transport networks (as per the intervention above).