

# **Examination of Edmonton Leaside Area Action Plan – Matter 6: Transport and Movement**

Hearing Position Statement on behalf of Aytans  
MFG Co UK Limited

September 2018

**Turley**

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**Contact**

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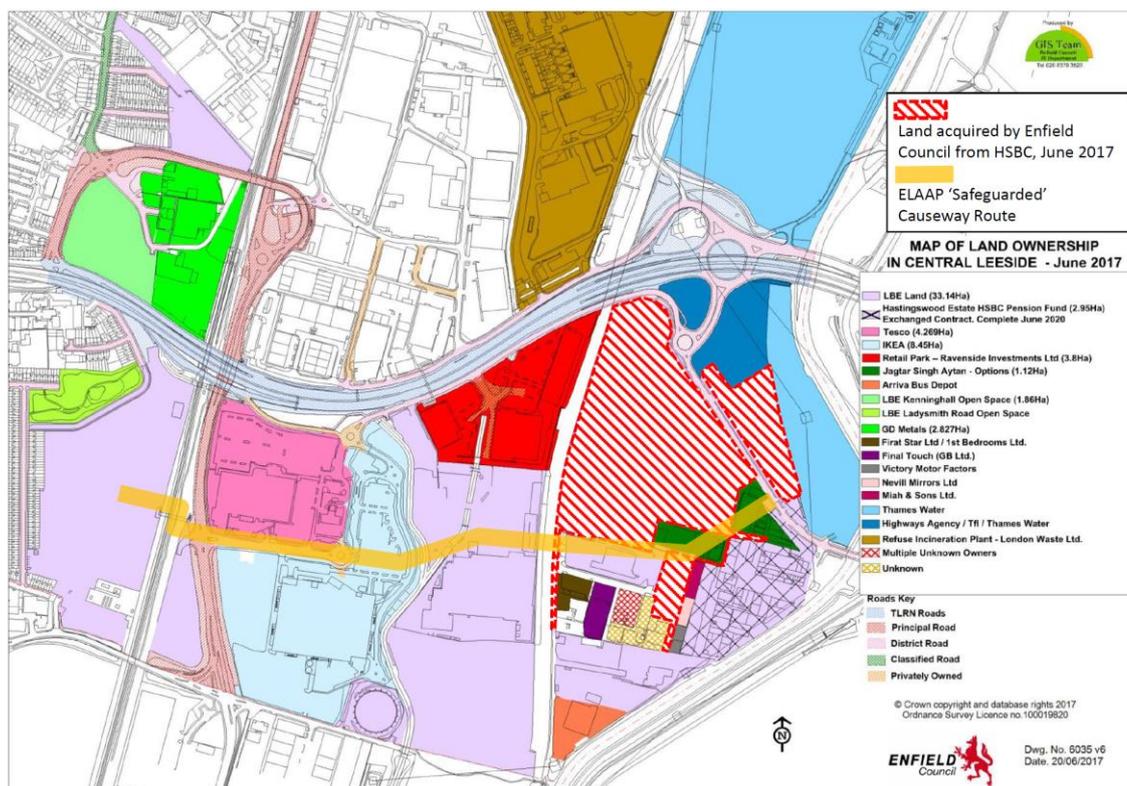
September 2018

# 1. Introduction and Summary Overview

- 1.1 This Position Statement is submitted by Aytans MFG Co UK Limited in relation to Matter 6 and the related Inspector's questions ahead of the Examination of the Proposed Submission Edmonton Leaside Area Action Plan 2018 (ELAAP). Specific focus is given to Question (ix) in relation to the alignment, constraints and achievability of the Causeway on its 'fixed' route<sup>1</sup>.
- 1.2 JS and SS Aytan are the freehold owners of two key parcels of land that lie within the eastern part of the Meridian Water area of the ELAAP. Aytans MFG Co UK Limited is the Aytan's clothing business.
- 1.3 Previous representations were made by Turley jointly in the name of Aytans MFG Co UK and LaSalle Investment Management (LIM), acting on behalf of HSBC Pension Fund. HSBC owned a large proportion of the land (approximately 13.5 hectares) on the east side of the Meridian Water area. Since the Proposed Submission ELAAP was published and representations were made, HSBC sold its land interests to the London Borough of Enfield in June 2017. The land sold to the Council is hatched red in **Figure 1** below. A larger scale version of the figure is provided at **Appendix 1**.
- 1.4 Two plots (each of approximately 0.6 hectares in area) known as the Silvermere site and Triangle site were sold by HSBC in October 2016 and April 2017, respectively, to JS and SS Aytan. The land is shown in dark green in **Figure 1**. Their intention is to retain this ownership in order to construct two buildings for flexible B1c/B8 use, with ancillary showroom and offices. These buildings were granted planning permission by Enfield Council (application references 17/02151/FUL and 17/02152/FUL) on 11 May 2018. The buildings are to enable the Aytan's clothing business to relocate and expand at Meridian Water. Copies of the approved block plans and elevations for the redevelopment of the Silvermere and Triangle sites are provided at **Appendix 2**.
- 1.5 The ELAAP Causeway route is shown marked orange in Figure 1. Notwithstanding Enfield Council's acquisition of a substantial area of land within Meridian Water in June 2017 after publication of the Submission ELAAP, the opportunity has not been taken by Enfield Council to revisit the ELAAP proposals. Timescales would have easily allowed the Council to determine whether there is the opportunity to locate the Causeway route away from third party land. There has also been time to publish Modifications to align it (or at least show route options) on land which has become fully under the control of the Council.

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<sup>1</sup> Under ELAAP Policy EL6, described at paragraphs 5.8.1 to 5.8.10 and shown at Figure 5.1



**Figure 1: Land Ownership at Meridian Water. Causeway route from ELAAP Figure 5.1**

1.6 With regard to paragraph 182 of the NPPF and, setting aside the change in ownership, the alignment of the Causeway shown in the ELAAP does not need to be fixed. As a result, and in combination with other Position Statements in respect of other matters, the ELAAP is plainly unsound on the basis of:

- Not being **justified**, as the most appropriate strategy, since the fixed/ 'safeguarded' route in the ELAAP has not been subject to a transparent comparative and equal assessment of reasonable alternatives in the evidence base or in the Sustainability Appraisal; and
- Is not **justified** or **effective**, since an alignment on third party land cannot in any way be presented as the most appropriate strategy when considered against reasonable alternatives (for example, on adjacent land over which the Council now has full control).

### Changes to the ELAAP to resolve the objection

1.7 The representations made by Aytans MFG Co UK Limited under Matter 6 can easily be resolved by simple changes to the ELAAP. These changes are specified in section 3 below. In part they require Figure 5.1 to show either (a) a different Causeway route (to be marked "illustrative") which avoids the Triangle and Silvermere sites, or (b) several possible alternative options for the Causeway route; and revisions to Policy EL6 to refer to the route as not fixed; and deletion of text in paragraphs 5.8.7 to 5.8.10 which seek (but fail) to justify the present fixed Causeway alignment.

## 2. Matter 6: Transport and Movement

2.1 This section seeks to respond in detail to the Inspector's questions under Matter 6, focusing on question (ix) as follows:

**“In relation to the Causeway, is it necessary for the alignment of The Causeway to be fixed in the Plan? Is it achievable? Does it adequately take account of existing constraints? How will it serve or impact on existing operators?”**

2.2 Draft Policy EL6 the ELAAP includes a “safeguarded” alignment of the Causeway through Meridian Water, as described at paragraphs 5.8.1 to 5.8.10. The route (comprised of Segments 1, 2, 3 and 4) is illustrated in Figure 5.1 of the ELAAP. However, the sections of the alignment located on the east side of the River Lee Navigation are inconsistent with and different to all previous alignments tested or published in the following documents:

- Upper Lee Valley Opportunity Area Planning Framework (ULVOAPF), 2013 (NRBD-03)
- Meridian Water Masterplan, July 2013<sup>2</sup> (EBD-09)
- Proposed Submission Central Leaside Area Action Plan (CLAAP), November 2014 (EBD-04)
- Edmonton Leaside Area Action Plan Meridian Water ‘Scenario Testing’ evidence base document, prepared by Karakusevic Carson Architects (KCA), February 2017 (ELAAP-14)
- Sustainability Appraisal, AECOM, March 2017 (no alignments are shown) (ELAAP-08)

2.3 The principle of providing an east-west route/spine running through the area, linking existing and new communities and the station on the west side of Meridian Water and Lee Valley Regional Park to the east<sup>3</sup> is accepted and therefore common ground.

2.4 However, it is not necessary for the Causeway alignment to be fixed in the ELAAP in order for the ELAAP to comply with the soundness tests under paragraph 182 of the NPPF 2012, (or paragraph 35 of the new NPPF, July 2018).

2.5 Indeed, fixing the alignment is also not desirable. The ELAAP intends to set the vision for Edmonton Leaside to 2032. The arrangement and mix of uses, sizes of plots and building blocks and the extent to which uses over this time period can practically provide active frontages to the Causeway is not known. A fixed alignment significantly limits flexibility in masterplanning, design, layout and orientation of the new buildings which will ultimately end up located along its route.

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<sup>2</sup> The Meridian Water is a planning and urban design guidance document, not SPG

<sup>3</sup> As referred to under the 8<sup>th</sup> bullet point of Core Policy 38 in the Enfield Core Strategy 2010 and in section 7.3 of the ULVOAPF, 2013

- 2.6 The alignment also pre-supposes that the area of Meridian Water east of the River Lee Navigation will be removed from its current allocation as a Strategic Industrial Location (SIL) under London Plan (2016) Policy 2.17 (Table A3.1) and Enfield Core Policy 14. The GLA has stated that this is not compliant with the London Plan<sup>4</sup>.
- 2.7 At page 11 of the KCA Meridian Water ‘Scenario Testing’ document it states that *“Releasing Strategic Industrial Land is essential to enable the critical east-west connection across the site and the access to the Lea Valley Regional Park”*. This is simply not correct and it is noted on page 25 of the Enfield Council Schedule of Responses in Plan Order to the ELAAP<sup>5</sup> that the Council concedes *“While the release of SIL will allow the full potential of the Causeway to be realised, it is accepted that the route could be achieved without SIL release”*.
- 2.8 The intention to fix the alignment of the Causeway route in the ELAAP, as shown at Figure 5.1 fundamentally makes the ELAAP unsound. The detailed reasons for this are expanded below.
- 2.9 The Meridian Water Masterplan and the CLAAP have suggested different alignments to the one now proposed in the ELAAP. Although these documents have been superseded, it is clear that there is more than one potential solution. Not one of the evidence base documents for the ELAAP, or the Sustainability Appraisal have carried out a thorough comparative and equal assessment of reasonable alternatives. The SA is silent on whether any alternative Causeway alignments have been tested and/or why options rejected.
- 2.10 Paragraphs 5.8.7 to 5.8.10 of the ELAAP seek to demonstrate why each of the four segments of the Causeway alignment are positioned as shown in Figure 5.1. (With Segment 3 explained as being based on a 200 metre distance for pedestrian access to bus stops and Segment 4 based on the position of the sub-surface Thames Water Spine Tunnel).
- 2.11 In relation to the former, bus stops exist on Harbet Road, but there is no reason why 200 metres must be achieved as a threshold<sup>6</sup>. In respect of the latter, there is no reason why buildings cannot be developed over the Spine Tunnel. Detailed discussions with engineers at Thames Water Utilities Limited (TWUL) in respect of the foundation solution for the planning application proposal on the Triangle site (ref. 17/02152/FUL) which is located directly above a section of Tunnel resulted in no objection from TWUL. Indeed, buildings located above it are *desirable* due to the compaction needed on the tunnel to balance the water pressure within the tunnel. Existing buildings in the area are also located over other parts of the Tunnel, as shown on the Thames Water plan at **Appendix 4**.

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<sup>4</sup> Letter from Mr Jules Pipe, Deputy Mayor for Planning, Regeneration and Skills to Mr James Gummery of Enfield Council, 7 July 2017, paragraph 3, page 3 (refer to **Appendix 3**)

<sup>5</sup> Submission Edmonton Leaside Area Action Plan Schedule of Responses in Plan Order (ref. **ELAAP-05**)

<sup>6</sup> ELAAP Policy EL23 (Enhancing the Bus Network and Services) seeks ensure that: *“Integration of bus and rail services is improved, and to ensure that major new developments have good access - of no more than 640m from the development - to a bus stop.”*

- 2.12 Paragraphs 4.23 to 4.32 of the Turley April 2017 representation document to the Submission ELAAP explain the position fully in respect of Segment 3 and 4. There are no technical or other robust reasons for the fixed Causeway alignment in these segments.
- 2.13 Since April 2017 Enfield Council has made a very significant acquisition of land at Meridian Water, east of the River Lee Navigation. As **Figure 1** shows, this gives the Council control of the large majority of the land on the east side of Meridian Water, but the alignment of the proposed Causeway has been maintained across the Silvermere and Triangle sites. With regard to NPPF paragraph 182 this can in no way be seen as **justified** as the most appropriate strategy when considered against reasonable alternatives.
- 2.14 The Council has had time and the opportunity since it acquired the land to properly test and publish Modifications to the ELAAP which make a minor change to the alignment of the Causeway that does not suffer the same consequences of the currently proposed alignment which:
- (a) necessitates the use of third party land over which the Council has no control. This severely compromises its' deliverability; and
  - (b) removes the benefit to JS and SS Aytan of two full planning permissions granted by the Council in May 2018 which enable the beneficial redevelopment of the Silvermere and Triangle sites on which they wish to relocate and expand their business. Such uses are fully SIL-compliant. This would be a significant impact on an existing local business.
- 2.15 For these reasons, there is no basis on which the ELAAP can demonstrate the Causeway alignment shown is **effective or justified** as the most appropriate strategy, when considered against reasonable alternatives. Policy EL6, paragraphs 5.8.1 – 5.8.10 and Figure 5.1 are unsound.
- 2.16 Paragraph 5.8.5 states that the design of the Causeway should reflect its dual role as a route and a destination, supporting retail, leisure, community and cultural uses, *“reflecting and complementing the character of the surrounding neighbourhoods”*. East of the River Lee Navigation, the proposed alignment runs through SIL. Such uses are not SIL-compliant and the de-designation of the SIL there should not be assumed.

### **Inspector's Initial Observations**

- 2.17 It is noted that in the Inspector's Initial Observations (document ref.**EXD-03**), only *“a single route is defined for the east-west link referred to as the Causeway”*. It is then asked by the Inspector: *“With this in mind, what factors have determined the selection of alternative options for the SA? Is the Council assured that the SA has been robustly prepared with a comparative and equal assessment undertaken of each reasonable alternative?”* In addition, *“Taking into account the findings of the SA, how has the SA process informed the selection, refinement and publication of proposals in the AAP?”*
- 2.18 In the response letter prepared by Mr James Gummery of Enfield Council dated 11 June 2018 (ref.**EXD-04**) it is stated that:

*“The Causeway route has been developed to respond to the regeneration requirements of the site. The route set out in the ELAAP responds most effectively to the requirements of the new development and restrictions of the site. In particular the route must be centrally located within the development if it is to provide the attributes of good transport access for all parts of Meridian Water. Other routes do not meet the needs as effectively in terms of traffic movement, pedestrian accessibility, and response to site constraints such as the Thames Water tunnel. A further assessment of other routes through the SA process was therefore seen as unnecessary”.*

*“The SA should assess reasonable alternatives - rather than all possible alternatives - and given the reasons set out above, the Council is satisfied that the SA has achieved this for plan-making purposes”.*

- 2.19 None of the points made properly answer the Inspector’s questions, or criticisms made by Turley in its representations, or set out above. In fact, the points made expose that there is no justification for the Causeway route selected and, very significantly, *no options* have been tested in the SA.

### 3. Changes to the ELAAP to resolve the objections

- 3.1 The representations previously made by JS an SS Aytan, set out in detail in the Turley representation document dated April 2017 and updated above can be resolved by a small number of changes to the emerging ELAAP, as set out below.
- 3.2 These suggested modifications have been shared with officers at the Council ahead of the completion of this Position Statement but a response has not been received in sufficient time prior to the deadline for submission of Position Statements. However, Turley will continue to try to liaise with officers on whether these Modifications can be made prior to the Examination commencing.

**Table 1:** Requested Changes to the ELAAP to resolve the objections:

#### Requested Changes

##### Policy EL6

- Under Policy EL6, text reference to Figure 5.1 should state that any route of the Causeway in the ELAAP *“is indicative and not fixed, but will be determined through further urban design work and as applications for plots within Meridian East are formulated”*.
- Delete the 3<sup>rd</sup> and 4<sup>th</sup> bullets under Part B of Policy EL6 (which seek active frontages on both sides of the Causeway and specify locations of parking along the route of the Causeway). This is not realistic, especially as the design, scale, use and orientation of neighbouring uses is not known. The text regarding parking positions is overly prescriptive.

##### Figure 5.1

- Amend the title of Figure 5.1 to read *“Indicative Causeway Route[s]”*.
- The indicative route at Figure 5.1 to be changed to avoid the Triangle and Silvermere sites. A route running parallel and just north of Anthony Way has been suggested by Turley in the previous representations. As an alternative, graphically, several possible alternatives on Council land could be shown.
- Delete all references to the Figure 5.1 route being ‘safeguarded’, including at the heading on page 60 and at paragraph 5.8.6.

##### Other changes to Section 5.8

- A new figure showing the Council’s land ownership to be added. New explanatory text to be added at 5.8.7 – 5.8.10 to explain the route (at least east of the River Lee Navigation) *“will be delivered on Council or publicly owned land and avoid third party land to assist deliverability”*.
- Delete the unnecessarily prescriptive Causeway route widths from Figure 5.1 (and

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5.8.7 – 5.8.10).

- Delete the text under paragraphs 5.8.7 to 5.8.10 (and especially in relation to Segment 3 and 4) which erroneously tries to justify a technical basis for the alignment of these segments. The reasons stated are not robust or sound.
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3.3 Unless these changes are made, the ELAAP is unsound with regard to NPPF 2012 paragraph 182 and NPPF 2018 paragraph 35 for reasons that these elements of the ELAAP are not effective or justified. The Council has included in its published Schedule of Minor Amendments (ref.**ELAAP-03**) the proposal to add the following wording to ELAAP paragraph 5.8.5: *“The Causeway route shown by Figure 5.1 will be subject to technical feasibility and detailed site investigation which may result in minor refinements as necessary”*. This wording in no way resolves the concerns or satisfies the changes needed to the ELAAP to make it sound on Matter 6.

**Appendix 1: Figure 1 Land Ownership at Meridian Water and Causeway Route**

 Land acquired by Enfield Council from HSBC, June 2017

 ELAAP 'Safeguarded' Causeway Route

**MAP OF LAND OWNERSHIP  
 IN CENTRAL LEESIDE - June 2017**

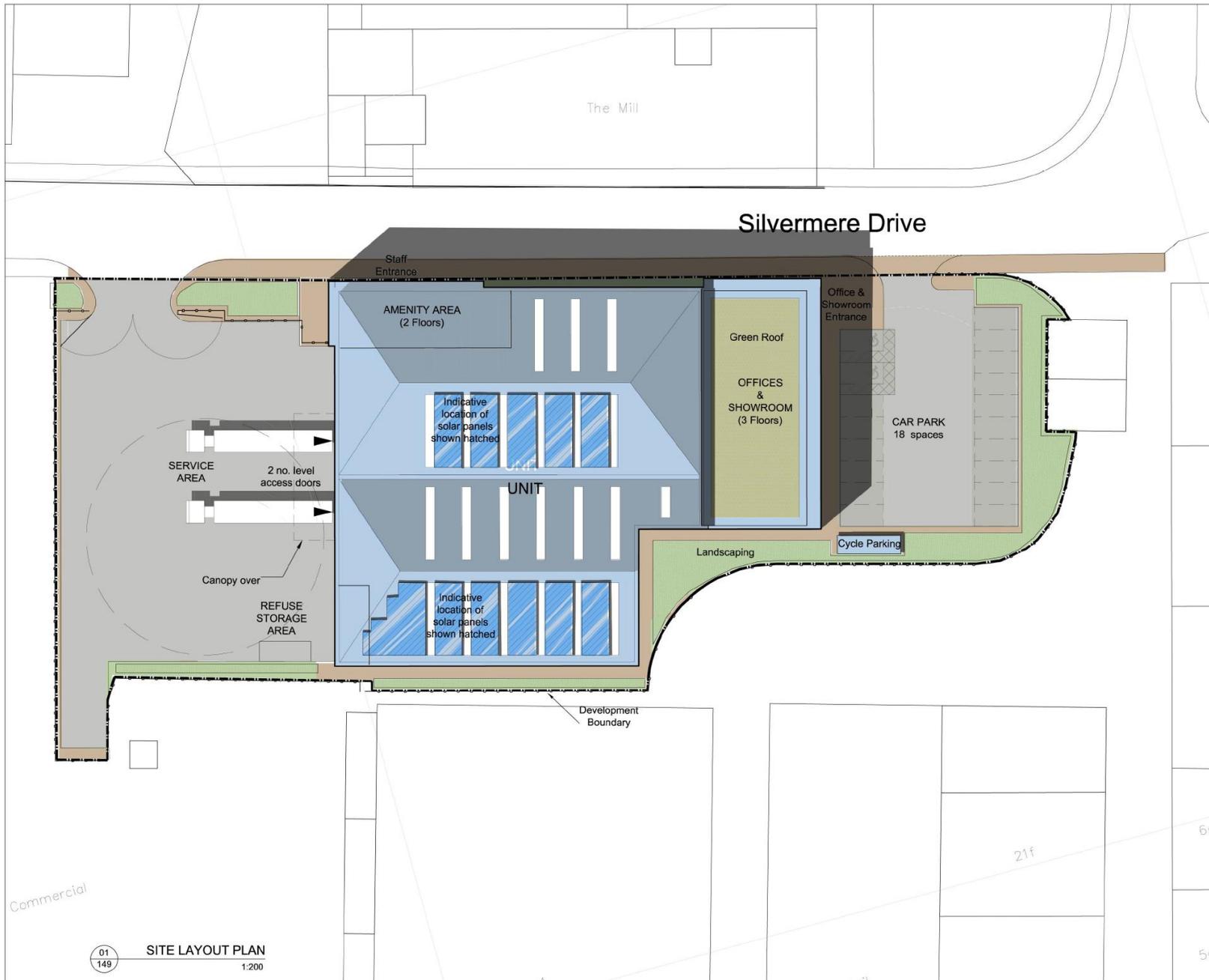
-  LBE Land (33.14Ha)
-  Hastingswood Estate HSBC Pension Fund (2.95Ha)  
Exchanged Contract. Complete June 2020
-  Tesco (4.269Ha)
-  IKEA (8.45Ha)
-  Retail Park – Ravenside Investments Ltd (3.8Ha)
-  Jagtar Singh Aytan - Options (1.12Ha)
-  Arriva Bus Depot
-  LBE Kenninghall Open Space (1.86Ha)
-  LBE Ladysmith Road Open Space
-  GD Metals (2.827Ha)
-  Firat Star Ltd / 1st Bedrooms Ltd.
-  Final Touch (GB Ltd.)
-  Victory Motor Factors
-  Nevill Mirrors Ltd
-  Miah & Sons Ltd.
-  Thames Water
-  Highways Agency / TfL / Thames Water
-  Refuse Incineration Plant - London Waste Ltd.
-  Multiple Unknown Owners
-  Unknown

- Roads Key**
-  TLRN Roads
  -  Principal Road
  -  District Road
  -  Classified Road
  -  Privately Owned

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**Appendix 2: Approved block plans and elevations for redevelopment of Silvermere and Triangle sites**



**NOTES:**

SUBJECT TO STATUTORY CONSENTS

BASED ON GREENMATCH GROUP'S TOPOGRAPHICAL SURVEY DRAWING REF: TSP-016 REV.2 DATED: 10/08/12

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D	08-10-2017	Refuse storage area added	FMR	AW
C	15-09-2017	Kerbs re-aligned	FMR	AW
B	04-05-2017	Note changed	FMR	AW
A	25-04-2017	Rooflights changed. Solar panels shown	FMR	AW
—	04-2017	Final issue	FMR	AW
REV	DATE	NOTE	DRAWN	CHECK

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SEASONS ROAD  
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FAX: 020 7736 3999  
www.msp-sparkassociates.co.uk

LASALLE INVESTMENT MANAGEMENT  
FAIRACRE

**TITLE**  
STONEHILL ESTATE, ENFIELD  
**DRAWING**  
THE SILVERMERE SITE - SITE LAYOUT PLAN IN ILLUSTRATIVE COLOUR  
**CLIENT**  
FAIRACRE & LASALLE INVESTMENT MANAGEMENT

DATE	SCALE	DRAWN
APR 2017	1:200@A1	FMR
STATUS	CHECKED	
PLANNING	AW	

**DRAWING NUMBER**  
30371-PL-149D

**01**  
149 **SITE LAYOUT PLAN**  
1:200





NOTES:

SUBJECT TO STATUTORY CONSENTS

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 TOPOGRAPHICAL SURVEY  
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D	09-10-2017	Refuse storage added	IN	AW
C	15-09-2017	Kerbs re-aligned	IN	AW
B	28-04-2017	Car parking updated. Note changed	FMR	AW
A	28-04-2017	Solar panels changed	FMR	AW
X	08-04-2017	First issue	FMR	AW
REV	DATE	NOTE	DRAW	CHECK



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**LASALLE INVESTMENT MANAGEMENT**  
**FAIRACRE**

TITLE:  
**STONEHILL ESTATE, ENFIELD**

DRAWING:  
**THE TRIANGLE SITE - SITE LAYOUT PLAN  
 IN ILLUSTRATIVE COLOUR**

CLIENT:  
**FAIRACRE &  
 LASALLE INVESTMENT MANAGEMENT**

DATE	SCALE	DRAWN
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STATUS	CHECKED	
PLANNING	AW	

DRAWING NUMBER:  
**30371-FE-148D**

01  
 148  
**SITE LAYOUT PLAN**  
 1:200



**1 WEST ELEVATION**  
1 : 200



**2 NORTH ELEVATION**  
1 : 200



**3 EAST ELEVATION**  
1 : 200

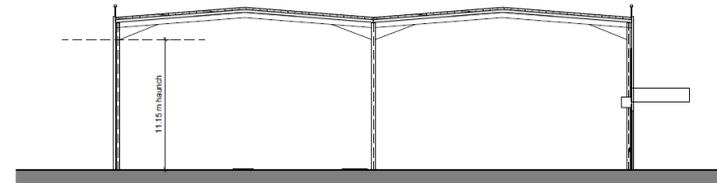


**4 SOUTH ELEVATION**  
1 : 200

**SCHEDULE OF EXTERNAL FACING MATERIALS**

UNIT	
① Profiled Wall Cladding 1	1000 x 32W Horizontally (panel out) profiled steel cladding Finish: Tata Colorcoat Prisma. Colour: Orion (dark metallic grey)
② Profiled Wall Cladding 2	1000 x 32W Horizontally (panel out) profiled steel cladding Finish: Tata Colorcoat Prisma. Colour: Sirius (light metallic grey)
③ Loading Doors	Sectional composite steel loading doors Finish: Polyester powder coat. Colour: RAL 9007 (dark metallic grey)
④ Personnel Doors	External steel doorsets Finish: Polyester powder coat. Colour: RAL 9007 (dark metallic grey)
⑤ Vertical and horizontal flashings and handover RAL	Pressed metal flashings. Colour: Dark metallic grey
⑥ Roof	Profiled steel roof cladding. Finish: Tata HPS200 Colour: Merin Grey
⑦ Canopy over Loading Doors	Steel framed decked canopy with colour coated fascia. Colour: RAL 1023 Yellow
<b>OFFICES</b>	
⑧ Office Cladding 1	Metal faced flat "Rain Screen" cladding. Colour: RAL 1023 Yellow
⑨ Windows and curtain walling to offices	Green tinted anti-sun glass in polyester powder coated aluminium curtain walling system. Colour: RAL 9007 (dark metallic grey)
⑩ Canopy over office entrance	Green tinted glazing panels fixed to steel bracket PPC (RAL 9007)

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**5 SECTION**  
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REV	DATE	BY	CHKD	NOTE	CR/CHKD
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CLIENT	FAIRACRE & LASALLE INVESTMENT MANAGEMENT		
SITE	STONEHILL ESTATE, ENFIELD		
DRAWING	THE TRIANGLE SITE - Elevations in illustrative colour		
PROJECT NUMBER	33371	PL	150
DATE	APR 2017	SHEET NUMBER	150
REVISION	AW	REVISION	C
STATUS	AW	PLANNING	PLANNING
SCALE	1 : 200 (A1)		
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**Appendix 3: Letter from Deputy Mayor dated 7  
July 2017**

# Development, Enterprise and Environment

**James Gummery**  
Principal Planning Officer  
Planning Policy, Regeneration & Environment  
Enfield Council  
Civic Centre  
Silver Street  
Enfield EN1 3XY

**Our ref:** D&P/LDF10/LDD18/MJ01

**Date:** 7<sup>th</sup> July 2017

Dear Mr Gummery

**Enfield Council Local Development Framework: Proposed Submission Edmonton Leaside Area Action Plan (January 2017)  
Statement of general conformity with the London Plan (Planning and Compulsory Act 2004, Section 24(4)(a))**

Thank you for your notification of 15 March 2017 consulting the Mayor on the above document and requesting an opinion on general conformity. The Mayor has delegated authority to me to respond. As you will be aware, all development plan documents must be in general conformity with the London Plan under section 24 (1) (b) of the Planning and Compulsory Purchase Act 2004.

On 16 March 2015, GLA officers provided comments (reference: D&P/LDF10/LDD05/MJ01) on the Proposed Submission Central Leaside Area Action Plan (November 2014), which concluded that the AAP was in general conformity with the London Plan. A number of suggestions and other representations to clarify and improve policy areas were set out and discussed with Enfield officers subsequently.

On 12 February 2016, GLA officers provided comments (reference: LDF10/LDD16/MJ01) on the Consultation on a New Local Plan for Enfield 2017-2031 (November 2015), which recognises the scale of change since the adoption of Enfield's Core Strategy in 2010, expected future population growth, major new transport projects, Housing Zone status, and increased housing targets for Meridian Water. The Council has therefore re-drafted the AAP to reflect the new Local Plan, and has changed the document name from 'Central Leaside' to 'Edmonton Leaside', to better reflect the locality. Further discussions on the proposed re-drafted AAP took place between officers in late 2016.

GLA and Enfield officers have engaged in further discussions concerning the Proposed Submission Edmonton Leaside Area Action Plan (January 2017), prior to issuing this letter.

## Strategic Industrial Land

London Plan Policy 2.17 highlights the importance of Strategic Industrial Locations (SIL) as London's main reservoirs of industrial and related capacity. Policy 4.4 'Managing Industrial Land and Premises' states that a rigorous approach will be applied to industrial land management to ensure a sufficient stock to meet future needs, and plan, monitor, and manage release of surplus land where appropriate.

The Proposed Submission AAP proposes to release a significant area of SIL, comprising the entirety of the Harbet Road Industrial Estate (18 hectares); with replacement SIL designation comprising Deepham's Sewage Works (34 hectares), and three smaller parcels (4 hectares), resulting in a net increase of 20 hectares. The 2014 Proposed Submission AAP proposed to release only 4.5 hectares of the Harbet Road Industrial Estate SIL, with new designations to compensate, including Deepham's Sewage Works. GLA officers responded (March 2015) that the AAP was in general conformity with the London Plan; however some concerns were raised about the boundary between the retained Harbet Road SIL and the proposed residential uses in the released SIL, although it was noted that conflicting impacts could be ameliorated through careful design.

The greater release of SIL in the current AAP is identified as a result of the increasing need for housing; Housing Zone status; committed transport improvements (West Anglia Main Line and the relocation and expansion of Meridian Water station); and potential transport improvements (4 tracking of WAML, Crossrail 2). This has resulted in an increase to the Meridian Water housing target from 5,000 homes in the 2014 AAP, to the current target of 10,000 homes, with 6,700 jobs.

While the intention to provide increased housing is supported, this needs to be considered against the proposed loss of SIL. Enfield's industrial land release benchmark in the GLA's Land for Industry and Transport SPG is 33 hectares (2011-2031). The GLA's Industrial Land Supply and Economy Study (2015) indicates that 22 hectares of industrial land (SIL, LSIS and non-designated) was released between 2010 (prior to publication of the Enfield's Core Strategy in November 2010) and 2015. The Study also indicates that a further 24 hectares (excluding 18 hectares at Harbet Road) is identified for potential release, primarily through the Upper Lee Valley Opportunity Area Planning Framework (2013), which is considerably above the current London Plan/SPG benchmark. Transport improvements on the West Anglia Main Lane, potentially including Crossrail 2, are expected to lead to further pressure for industrial land release in Enfield.

Evidence in the GLA's recently published London-wide Industrial Land Demand Study also suggests that there will be positive demand for industry and warehousing in Enfield over the period to 2016-2041, reflecting the Borough's strategic advantages for these functions. Harbet Road Industrial Estate benefits from direct access to the adjacent A406 North Circular Road. This access to the strategic road network gives Harbet Road strong qualitative advantages as a location for logistics and industrial development and it plays an important function as part of the wider SIL in this location. It is also noted that the northern half of Harbet Road Industrial Estate was granted outline planning permission on appeal in 2015, for redevelopment to provide up to 46,451 sq.m. of industrial floorspace. This indicates that the site is both viable and attractive for industrial and logistics development. The southern part of the Estate also contains the Harbet Road bus depot, which needs to be located within the Meridian Water Masterplan area in order to support the growth envisaged within the AAP, along with local bus network improvements.

Furthermore, it should be noted that the proposed replacement SIL at Deepham's Sewage Works (34 hectares) cannot be considered as additional or new SIL capacity, as the site is currently in use

for existing utilities infrastructure. It cannot therefore be considered as compensation for the loss of SIL at Harbet Road, which could support 'core' industrial and warehousing/logistics functions. The three smaller parcels (4 hectares) could provide a contribution to industrial capacity; however there are concerns that these sites would not be an effective replacement for the loss of SIL land at Harbet Road due to their smaller size, lesser accessibility, and fragmented nature.

The AAP proposes industrial intensification and opportunities to make more efficient use of industrial land; however considering the recent rate of industrial land release, and the expected demand for industrial space, the GLA cannot support such a large scale loss of SIL until there is full consideration of the potential SIL/industrial land reconfiguration across the whole of the Upper Lee Valley. This is being undertaken as part of the refresh of the Upper Lee Valley Opportunity Area Planning Framework (OAPF), which is expected to be consulted on in early 2018. The OAPF will consider the impact of committed and potential transport improvements. Crossrail 2 is beyond the time period for the AAP; however the OAPF will consider how Crossrail 2 will facilitate the growth anticipated.

Therefore, it is my opinion that the approach to the quantum of SIL and LSIS release and reconfiguration as detailed in Policy EL14 'New Strategic Industrial Locations in Edmonton Leaside' (page 88), and Table 6.2 'New SIL Designated Areas in Edmonton Leaside' (page 87) is not currently in general conformity with the London Plan. However, GLA officers would welcome further discussions with the Council on this matter. Advice to date has indicated that the southern part of Harbet Road SIL may be suitable for de-designation subject to the intensification of industrial and warehousing uses in the northern part of Harbet Road (which would be retained as SIL); however this would be on the condition that the intensified industrial and warehousing uses in the northern part are delivered prior to the de-designation of the southern portion. The current floorspace capacity and areas for servicing in the whole of Harbet Road SIL would also need to be considered against that provided in new multi-level industrial and logistics buildings.

#### Other comments

Other than the approach to industrial land release, the stated vision and objectives for the Edmonton Leaside area and in particular the Meridian Water Regeneration Area are supported, in line with the London Plan and the Upper Lee Valley Opportunity Area Planning Framework (OAPF). As stated above, GLA officers are currently preparing a draft updated OAPF to better reflect expected future population growth, transport improvements, Housing Zone status, and increased housing targets for a number of areas, including Meridian Water. The Upper Lee Valley offers an opportunity to provide significant jobs and living space to support London's continued growth. It is essential that strategic and local plans are as closely aligned as possible in order to realise this ambition and I welcome the Council's engagement with the Mayor's Planning Unit and Transport for London to ensure this is the case.

The requirement in Policy EL1 'Housing in Meridian Water' to achieve a minimum of 35% affordable housing and work towards a target of 50% is supported; however the wording "to achieve a minimum of 35% affordable housing, measured as a proportion of the total number of units, or in part based upon the proportion of habitable rooms" is unclear and should be clarified.

For clarity it is suggested that an additional map is included showing current SIL and LSIS designations, as in the Proposed Submission Central Leaside Area Action Plan (November 2014).

The proposals for the redevelopment and reconfiguration of the retail units at Ravenside Retail Park, as discussed in Policy EL4 'Ravenside Retail Park' (page 53), are supported; however in line

with the NPPF and London Plan Policy 4.7, this should not lead to an intensification of retail floorspace without application of sequential and impact assessments. It is therefore recommended that Policy EL4 makes this clear.

Policy EL16 'Angel Road Retail Park' (page 97) for employment mixed uses is supported, as is the clause that residential uses will not be appropriate on this site.

The proposal to relocate the Harbet Road Bus Depot, as discussed in paragraph 5.4.19, should be discussed with Transport for London. Further comments from Transport for London are attached as an Appendix.

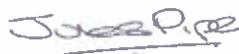
Section 5.11 and Policy EL10 'Urban Grain at Meridian Water' infers that active frontage only relates to non-residential uses; however paragraph 2.3.3 (and Housing Standard 10) of the Mayor's supplementary planning guidance on Housing states that "*active frontages are defined as development frontage on the ground floor where inhabited residential or non-residential uses are located, with a visually permeable elevation (e.g. windows or glazing) and a generous distribution of entrances*". It is therefore recommended that Policy EL10 makes this clear.

Policy EL11 'Building Form at Meridian Water' states that "*no more than 10% of all north facing residential units are single-aspect*"; however Housing Standard 29 of the Housing SPG states that "*single aspect dwellings that are north facing, or exposed to noise levels above which significant adverse effects on health and quality of life occur, or which contain three or more bedrooms, should be avoided*". It is therefore recommended that Policy EL11 reflects this.

Finally, on presentation, it is suggested that all maps in the document should include a key, as some currently have none (Figure 2.3, 2.4, 8.1, etc.). Component parts of the current Meridian Water masterplan are shown (Figure 5.1, 5.2, etc.); however it is recommended that the current masterplan is shown in Section 5.2.

If you would like to discuss any of my representations in more detail, please contact Martin Jones, [martin.jones@london.gov.uk](mailto:martin.jones@london.gov.uk) , 020 7983 6567, who will be happy to discuss and arrange further meetings.

Yours sincerely



**Jules Pipe**

Deputy Mayor for Planning, Regeneration and Skills

cc Joanne McCartney, London Assembly Constituency Member  
Nicky Gavron, Chair of London Assembly Planning Committee  
National Planning Casework Unit, DCLG  
Lucinda Turner, TfL

## **Appendix – Transport for London comments**

### **Edmonton Leaside Area Action Plan**

TfL supports the objectives of the Area Action Plan. For each of the five objectives the AAP identified where transport plays a part. TfL input into developing these objectives will range from developing best practice via the Healthy Streets approach, growing the bus network and investment in rail infrastructure such as Stratford – Angel Road (STAR) Project and after the plan period Crossrail 2, which needs to differentiate from four tracking. The comments indicate where the AAP should be updated:

#### **Healthy Streets approach**

There is an opportunity to update the AAP to reflect currently thinking on the Healthy Streets approach, particularly making sure that the AAP takes account of the 10 Healthy Streets indicators.

The Area Action Plan refers to A406 North Circular Road, which is part of the Transport for London Road Network (TLRN). The one proposal in the AAP is removal of the access ramp with Aragon Way to A406. TfL Technical Approval would be needed.

TfL and the Council will need to work together on any proposals within, over, under or adjacent to A406 to improve connectivity and quality of the environment taking account of the existing nature of this road and functions it will continue to perform.

#### **Bus Network**

The AAP is supported by transport evidence that shows how bus and rail network may build up over time. This starts at 5,000 homes and 3,000 jobs, and includes scenarios up to 12,000 homes and 6,000 jobs. However, we expect significant investment will be needed in bus network prior to 5,000 homes, and to deliver 10,000 homes will need Crossrail 2. Therefore, we would include the following projects in Table 14.1

- Early bus network for Meridian Water – Developer contributions, TfL – this should be developed alongside the Meridian Water Highway infrastructure study and Borough-wide service review as well as through individual sites.
- Upper Lea Valley transport modelling and bus priority study – TfL, Enfield, Haringey – this study should be complete later this summer
- Meridian Water to Edmonton Green direct bus link - outcome should define bus infrastructure design and how it fits into the wider bus network.

#### **Crossrail 2**

Crossrail 2 is beyond the time period for the AAP; however, to achieve the growth anticipated in the Upper Lea Valley, it is right that AAP considers how Crossrail 2 will facilitate growth in AAP area. Crossrail 2 is project that TfL is promoting, however, it likely to require significant private sector funding to deliver it by 2033.

The previous AAP had a figure of 5,000 new homes (which aligns with what Crossrail 2 assumes in the Do-Minimum Scenario), with the introduction of Crossrail 2 a total of 10,000 new homes could be built on Meridian Water (part of the AAP to the south of the North Circular Road). The AAP should acknowledge that:-

*“the introduction of Crossrail 2 could lead to further opportunity for development including sites north of the North Circular beyond the number of homes currently identified in the AAP”.*

The AAP needs to be much clearer in explaining the role that Crossrail 2 has to play in facilitating uplift in development since the 2014 AAP.

In addition the AAP needs to differentiate between Crossrail 2 and 4-tracking. They are used interchangeably in the document and instead it needs to be clear that Crossrail 2 can facilitate more housing growth than just 4-tracking alone.

#### **Rail Comments**

The AAP development assumed uplift in Public Transport Accessibility Level of 4-6 and 'Urban' character, from a low base – an aim TfL supports. The additional transport provision required to support the increase in housing numbers is not clearly set out in the AAP. The transport assumptions around 4 trains per hour in 2018 and 8 trains per hour in 2022 are not committed.

Table 9 on page 14 refers to STAR trains per peak hour required to meet demand from different levels of development. The STAR service is a 2tph service between Stratford and Meridian Water which will serve the Leaside area. In addition, other Greater Anglia services will stop at Meridian Water and Ponders End which is north of the Leaside area. At present the total frequency of trains calling at Meridian Water is between 2 and 4 per hour and Enfield Council is working with GLA, TfL, Network Rail, Greater Anglia and Department for Transport to try and increase the frequency of calls, perhaps by introducing a shuttle service from Tottenham Hale.

Section 10.1 of the AAP document makes it sound as if there are confirmed plans to introduce these service uplifts. TfL is not aware of any current plans to increase frequency to 8tph from 2022 and further platform capacity is unlikely to be available at Stratford to facilitate this proposal. As noted above 4tph in 2018 is not currently deliverable.

Meridian Water station is due to open in May 2019.

#### **Bus Depot**

The Area Action Plan (Para 5.4.19) observes the need to safeguard the bus depot, which is at Towpath Road, in accord with the Mayor's Land for Industry and Transport SPG. TfL will advise the Mayor on whether alternative site is suitable and will need to know it is secured for use as a bus depot before agreeing to loss of bus depot at Towpath Road.

Bus depots are mainly owned and operated by commercial bus companies, who tender to provide bus services to TfL. In areas of employment and residential growth, to ensure the bus network can be delivered at reasonable cost and standards required by TfL we need to retain and expand bus depot capacity, up to 200 unit (buses) site with associated workshops needs to be accommodated locally. This site will need to be operational before the existing facility could close. TfL would expect that planning permission for the alternative site would be secured prior to granting permission for an alternative use of the depot site. TfL recommends incorporating a new bus depot into the Meridian Water masterplan.

There are also wider benefit of retaining bus depot on site to support locally skilled engineering jobs, jobs for drivers, management jobs and other support staff, local suppliers and contractors. TfL is promoting innovation in bus engine technology to reduce air quality and noise impact, as well on board technology. Therefore, skills in the bus industry will change over time, so links to local training and educational institutes should be encouraged.

TfL will not agree to the loss of the bus garage as part of the AAP suggests we might. We will work with the Council to make sure an appropriate bus depot is provided within the AAP area.

### **Freight and Strategic Industrial Land**

Freight is an essential user of the road network which requires Strategic Industrial Land (SIL) in outer London to serve all of London. The Mayor is keen to reduce freight traffic in central London and manage its impacts overall. Protecting warehousing and industrial land close to key growth areas is part of that vision for London.

If SIL is to be released in one part of the city we need to understand where those business activities would take place once the SIL is released, and what effect this would have on services locally and to the rest of London.

TfL recommends that release of SIL needs to be considered at the London wide scale and also linked to strategic changes to transport network beyond the life of this plan.

### **Water freight**

TfL is encouraged that the Council wishes to promote water borne freight within the AAP. The amount of locks and poor water infrastructure within the Borough constrain the development of this mode.

TfL is keen to promote more water freight in London. To do that locally we need to define what kinds of water freight the Council would seek to grow in Edmonton Leaside and the land use and infrastructure implication, for example, Edmonton EcoPark. In the absence of specific types of growth the following actions aimed at growing water based freight are recommended:

- Protect key wharfs and road access to them through the planning process
- Establish a working group with the PLA, potential freight operators, end users and Canal and Rivers trust to grow the Boroughs long term ambitions

Further guidance on freight will form part of new Mayor's Transport Strategy, which is due to be published in May 2017.

### **Detail comments**

In section 1.1 – rail, walking and cycling are mentioned. There should be a mention of how critical bus services will be particularly in providing East-West connectivity and in linking the site to Edmonton.

In objective one (p6) need to include reference to public transport routes.

Para 5.4.19 (p50) – note TfL comments on importance of bus depots in supporting London's growth.

Policy EL6 (p58/9) – TfL recommends the policy should specify that as per 5.8.3 that the Causeway should prioritise Public Transport.

Policy EL7 (p63) should refer to bus standing as well as interchange.

Para 5.8.17 (p64) – should refer to bus standing.

Para 5.8.17 Parking (p65) – good to see such strong stuff on discouraging car parking

Para 11.3 (p120) – add modal shift to public transport too. Public Transport is much more preferable to shared mobility (car clubs, electric private vehicles) so this needs to be emphasised in this para. Section 11.6 (p126-128) – good strong stuff. Clearly notes the importance of services, traffic management,

infrastructure (including drivers' facilities). Policy EL23 should be used as an exemplar for other policies. There needs to be some interaction between walking and cycling policies/ network. The bus network hierarchy might well look like the cycling and walking routes identified in Figure 11.1 (p122)

Table 14.1 (p156) – There are three entries for the bus network in terms of delivery. TfL has appointed Arup to prepare the Upper Lee Valley transport modelling and bus priority study this will identify infrastructure needed to deliver growth in the Upper Lea Valley including Edmonton Leaside.

Transport review - the transport evidence appears to be just discussing parking levels rather than an overall transport strategy. I would however ask how they have calculated the bus movements required. These figures appear to be fairly arbitrary and do not account for where the demands are to/from – e.g. are they to Edmonton/Waltham Forest/Tottenham Hale?

On the maps Ponders End station is too far north.

## **Appendix 4: Thames Water Spine Tunnel Route Plan**



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