



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

MATTER 3

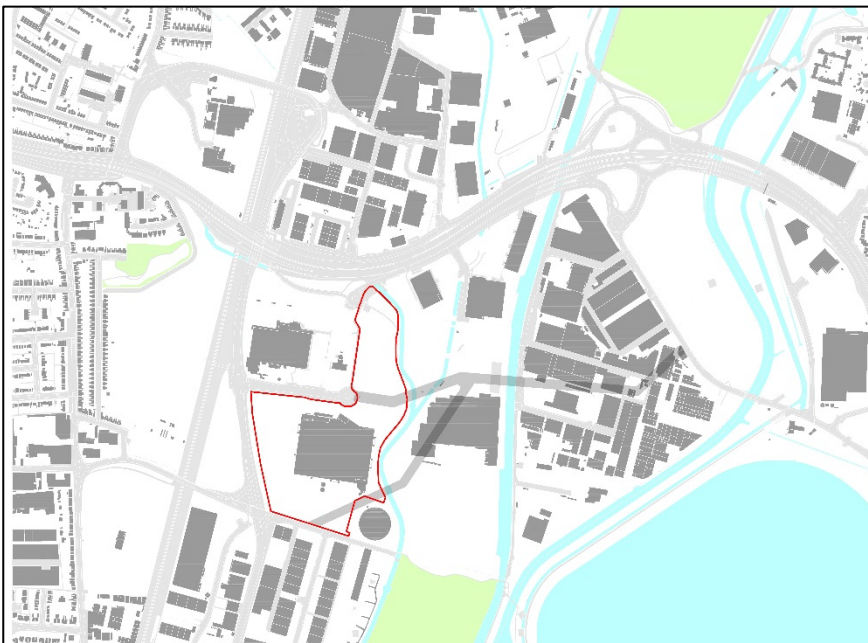
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1 Introduction

- 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 are supportive of 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to date were submitted by their previous planning advisors, Dalton Warner Davies, and that their role has been replaced by Quod who are now appointed as IKEA’s planning consultants.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 As presently framed, the AAP is not sound and IKEA object to Policies EL2, EL3, EL6, EL10, EL11, EL12 and EL13, various supporting paragraphs and figures, and Chapter 14. 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 to the above policies, paragraphs and figures. Whether these modifications are "Minor" or "Main" will be determined by LBE in agreement with the Inspector. Until these modifications are agreed, IKEA maintain their objection.
- 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), 8 (Infrastructure) 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 3 – Housing

- 2.1 Matter 3 relates to the extent to which policies in the Plan are consistent with the aim of providing the supply of housing required to meet the needs of present and future generations.
- 2.2 This Statement responds to the Inspector’s questions in relation to Matter 3. IKEA do not propose to appear at the Examination in connection with this matter.
- 2.3 The Statements submitted on behalf of IKEA in relation to Matters 6, 8 and 9 also address, in part, some of the questions raised by the Inspector in relation to Matter 3 and cross reference with this Statement is necessary.

i. Is the level of housing development which is proposed in the AAP justified and based on sound evidence? Is it consistent with local and national policy?

- 2.4 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 draft AAP has identified a more ambitious growth strategy to deliver a significant increase in the housing and new jobs (i.e. 10,000 new homes and 6,000 new jobs).
- 2.5 Whilst IKEA support the AAP growth strategy in principle, and notably its high level ambition, it has been developed without any transport modelling, and consequently the spatial strategy is not supported by any objective evidence.
- 2.6 NPPF Paragraph 35 states that *“Plans are ‘sound’ if they are: ... Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence”*.
- 2.7 In addition, 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).
- 2.8 The importance of objective evidence is clear, as it is necessary to demonstrate how a Plan has addressed relevant economic, social and environmental objectives, and in these cases where adverse impacts are identified, alternative options with less impacts can be considered (paragraph 32). Such evidence is also necessary in these cases where impacts are unavoidable, so that suitable mitigation and strategies can be proposed, where they are possible.
- 2.9 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. It is clear from the AAP that its strategy, given the current uncertainty on transportation implications, is without foundation.
- 2.10 In a recent meeting with LBE (3 September 2018), IKEA were informed that the Council intend to begin the modelling work in April 2019, and this will take 6-9 months to complete.
- 2.11 Consequently, determining a spatial strategy, including a quantum of development and transportation strategies is premature in a vacuum of transport modelling evidence. The level of housing proposed has not been justified nor based upon sound transport evidence and is not consistent with local and national policy.
- 2.12 See Statement submitted on behalf of IKEA in relation to Matter 6 for a full account of IKEA’s response to these issues.

ii. Is the proportion of affordable housing proposed consistent with other local and national planning policy? What justification is given for any departure from it?

2.13 No comment.

iii. Is the housing mix consistent with other local and national planning policy? What justification is given for any departure from it?

2.14 Policy H12 (Housing Size and Mix) of the draft London Plan (2018) states that “Boroughs should not set prescriptive dwelling size mix requirements (in terms of number of bedrooms) for market and intermediate homes”.

2.15 Draft AAP Policy EL1 however prescribes the delivery of 25% 3+ bed dwellings during the initial phases of development at Meridian Water - this does not comply with Policy H12 of the new London Plan.

2.16 During a recent meeting (3 September 2018), the Council advised IKEA that they would be proposing modifications to this policy to ensure consistency with the draft London Plan.

iv. Is the scale of housing proposed deliverable over the plan-period?

2.17 See above.

2.18 Due to the absence of transport analysis, there is no evidence that the scale of housing proposed is realistic.

Does it take a reasonable account of lead-in times and site assembly?

2.19 The land at Meridian Water is in multiple ownerships and the AAP does not demonstrate how the Council anticipates that the various phases will be funded and delivered. This needs to be clarified through an Infrastructure Delivery Plan (IDP).

2.20 It is also unclear how existing businesses will be maintained during construction. More detail is required on this matter or the AAP needs to make it clear that existing businesses will not be affected during construction.

2.21 The Statements submitted on behalf of IKEA in relation to Matters 8 (Infrastructure) and 9 (Implementation) outline IKEA’s response to these issues.

What key assumptions have informed the housing trajectory and how does the AAP seek to de-risk delivery to ensure the proposed number of homes are built?

2.22 This is unknown - IKEA have been liaising with the Council seeking confirmation on this matter over the past four years. IKEA are concerned that the deliverability of the proposed number of homes has not been demonstrated, as transport modelling has not been undertaken. See response to question (i) above.

v. Does the proposed scale of new homes strike the right balance between being aspirational but realistic (NPPF, paragraph 154)?

2.23 See above.

2.24 Due to the absence of transport analysis, there is no evidence that the scale of new homes is realistic, IKEA do not object to this level of housing growth, where it can be proven to be capable of being accommodated within the transport infrastructure.

vi. Given the significance of the number of new homes proposed to the Borough's growth requirements, what are the potential contingencies should development not proceed as envisaged?

2.25 See above.

2.26 Neither the deliverability nor potential contingencies have been assessed as part of the AAP..

vii. Would the wording proposed in policy EL1 be an effective means of achieving the aims and objectives of the Plan?

2.27 Whilst IKEA have no comments on the specific wording of Policy EL1, due to the absence of transport analysis, there is no evidence that the housing aims and objectives of the AAP can be achieved.