



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

MATTER 2 (IX AND XI)

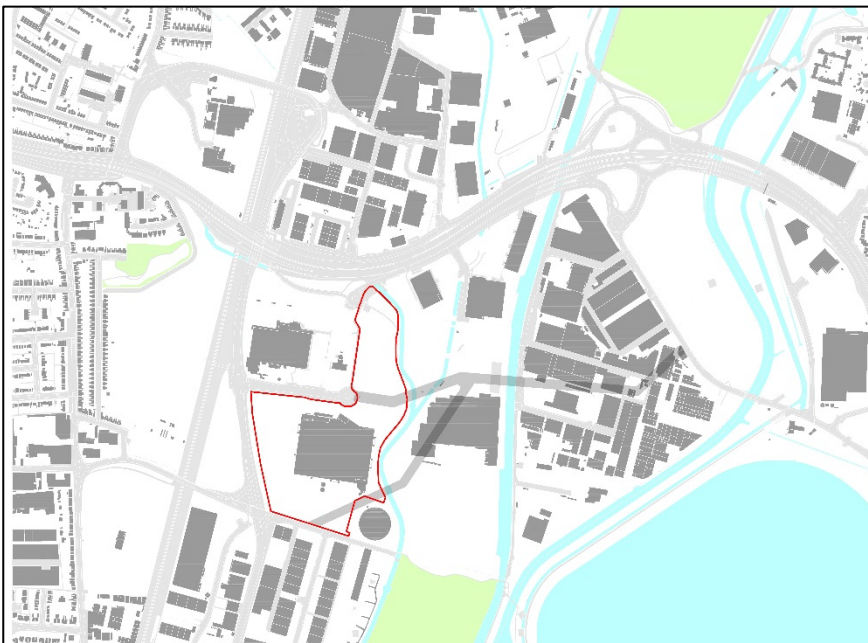
Contents

1	Introduction	1
2	Matter 2 (ix) and (xi) – Employment	3

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.
- 1.1 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.
- 1.2 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



- 1.3 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to date were submitted by their previous planning advisors, Dalton Warner Davies, and that their role has been replaced by Quod who are now appointed as IKEA’s planning consultants.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.
- 1.4 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.
- 1.5 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.
- 1.6 **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 2 (ix) and (xi) – Employment

- 2.1 Matter 2 relates to the extent to which the AAP accords with the aim of the National Planning Policy Framework (NPPF) (2018) to contribute to a strong, responsive and competitive economy. This Statement specifically responds to the Inspector’s questions (ix) and (xi).
- 2.2 IKEA do not propose to appear at the Examination in connection with Matter 2, in the event that agreement can be reached with LBE on various modifications to the AAP. It is expected these changes will be agreed in an SOCG.
- 2.3 The Statement submitted on behalf of IKEA in relation to Matter 6 also addresses, in part, some of the questions raised by the Inspector which are relevant to Matter 2 and cross reference with this Statement is necessary.

ix. How will the plan respond to the business needs of existing businesses within the Plan area?

- 2.4 The IKEA store is a major employer and retail destination within Meridian Water. The continued visibility of the store is central to its success, as is the continued accessibility of both of the store car parks by car borne customers, the servicing bay by service/delivery vehicles, and the store itself by customers travelling on foot between the store and the north east car park. Due to the bulky nature of the furniture goods sold, they cannot be easily transported via public transport. It is therefore vital to the future success of the IKEA store that the proposals within the AAP do not unduly affect the ease of car borne access to the store.
- 2.5 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, as the current drafting would adversely affect the above operational needs (see below and Statements in response to Matters 1, 3, 4, 6, 7, 8 and 9 for full details). To help address this, IKEA are working with LBE on a suite of proposed modifications to the AAP via an SOCG (see below). This is to help ensure that the continued visibility, accessibility and operation of the store is not adversely affected and that the future growth of the business is not inhibited. Until these modifications are agreed, IKEA maintain their objection. Whether these modifications are minor or main will be determined by LBE in agreement with the Inspector.
- 2.6 The proposed modifications and SOCG alone are however insufficient to address IKEA’s concerns and overcome their objection to the transport aspects of the AAP.
- 2.7 In this regard there is no evidence to demonstrate, in transport terms, that the area is able to sustainably accommodate the 10,000 homes and 6,000 jobs proposed (Policies EL1 and EL2) or the Causeway/Boulevard (Policy EL6). In addition, no assessment of reasonable alternatives has been undertaken in the case of transportation aspects of the Plan. This is contrary to the requirements of paragraphs 31 and 32 of the NPPF. Without this evidence, it is not possible to conclude that the Plan is deliverable over the plan period or that adverse impacts upon the continued operation, visibility and accessibility of the IKEA store will not be caused. This simply has not been tested.
- 2.8 The AAP does not therefore adequately respond to the business needs of IKEA. Moreover, the major omission of transport analysis from the evidence base means that the AAP cannot provide an effective strategic framework for sustainable development, and is unsound.
- 2.9 Further details in regard to these issues are set out within the Statements submitted on behalf of IKEA in response to Matters 1 (Legal Compliance), 3 (Housing) and 6 (Transport and Movement).

ix. Would the wording proposed in Policy EL2 be an effective means of achieving the aims and objectives of the Plan?

- 2.10 IKEA are working with LBE to agree modifications to the wording of Policy EL2 via an SOCG. As presently framed it is not sound, and IKEA object to its drafting. In this regard, IKEA have proposed that the first paragraph is modified to refer to 6,000 jobs for consistency with the remainder of the AAP, and have reiterated the above concerns in relation to the evidence base.
- 2.11 The remainder of the policy as drafted is insufficiently flexible and there is scope for the visibility, accessibility and operation of the store, together with the future growth of the business, to be adversely affected. To address this, IKEA have proposed that:
- An additional bullet point is added after the second, to refer to the *“growth of existing retail and ancillary businesses, enabling them to expand their operations and provide additional job opportunities”*; and
 - An additional bullet point is added at the end of the list, to refer to *“development which harms existing retail and ancillary businesses, in terms of operations (including car parking, servicing and access), visibility or employment, will not be permitted”*.
- 2.12 Subject to the modifications that we have proposed, IKEA would be satisfied that the wording proposed in the Policy comprises an effective means of achieving the aims and objectives of the Plan.

This is without prejudice to IKEA’s outstanding objection to the absent transport evidence base and IDP, as outlined above.