



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

MATTER 4 (III)

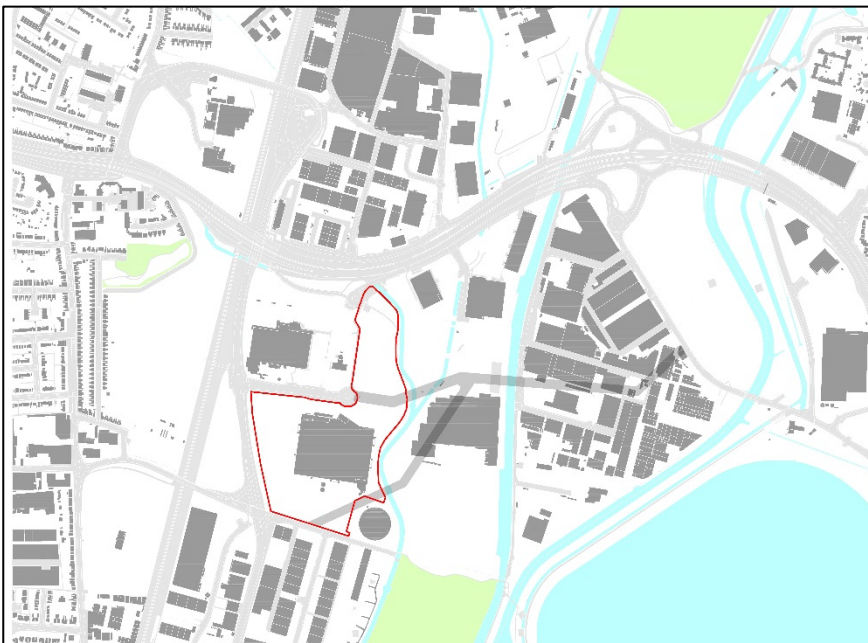
Contents

1	Introduction	1
2	Matter 4 (iii) – Design	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to date were submitted by their previous planning advisors, Dalton Warner Davies, and that their role has been replaced by Quod who are now appointed as IKEA’s planning consultants.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 4 (iii) – Design

- 2.1 Matter 4 relates to the extent to which the AAP would secure high quality and inclusive design, which would protect and enhance the built, natural and historic environment. This statement specifically relates to the Inspector’s question (iii).
- 2.2 IKEA do not propose to appear at the Examination in connection with Matter 4.
- 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 in relation to Matter 4 and cross reference with this Statement is necessary.

iii. Are the policies in the plan (EL9, EL10? EL11 and EL12) appropriate and achievable in relation to

a. tall buildings

b. active frontages

c. the provision of open space

d. the integration of river and canal corridors

e. design for health and well-being

Is the guidance “too prescriptive”? Does the Plan reflect local and national guidance in this regard?

Would the wording proposed in the relevant Plan policies be an effective means of achieving the aims and objectives of the Plan?

- 2.4 IKEA make no specific comments in relation to points (a), (c)-(e) or Policy EL9.
- 2.5 Over the past four years, throughout the preparation of the AAP, IKEA have sought to engage with LBE Planning Policy officers to reduce the overly prescriptive nature of a number of the policies, supporting paragraphs and figures, particularly in relation to unreasonable impacts upon existing businesses. This is to help ensure that the continued operation, visibility and accessibility of the IKEA store and the future growth of the business is not inhibited by the emerging AAP policies.
- 2.6 Progress has only very recently been made and IKEA are currently working with LBE to enter into an SOCG to agree to the wording of a series of modifications to (inter alia) Policies EL10, EL11 and EL12, and supporting text and figures. As presently framed, these are not sound and IKEA maintain their objection unless the proposed modifications are made. Whether these modifications are minor or main will be determined by LBE in agreement with the Inspector. These changes are proposed without prejudice to IKEA’s outstanding objection in relation to the absence of transport evidence.
- 2.7 Policies EL10, EL11 and EL12 are currently too prescriptive and IKEA seek for flexibility to be introduced in order for their objection to be overcome. In this regard, the following amendments are sought to Policy EL10 and the supporting text:
- To modify the second paragraph to state: *“Development proposals and supplementary planning documents ~~are expected~~ will be encouraged to”*;
 - To modify the second bullet point to state *“Develop a hierarchy-based network of streets and eliminating existing surface car parking (with the exception of on-street ~~and~~, blue-badge ~~and those~~ serving existing retail operations, such as IKEA parking)”*;

- In terms of the supporting text, and with regard to part (b) of the Inspector’s question, of particular concern to IKEA is that the AAP as currently drafted prescribes that active frontages should be provided along the Causeway/Boulevard (para. 5.11.4 & Fig. 5.4). IKEA have proposed modifications which state that this does not apply to existing businesses, and that this requirement should only be imposed where, (i) it is practical; (ii) consistent with the Meridian Water Masterplan, (iii) subject to detailed design, and (iv) where there would be no detrimental impact upon existing businesses.

2.8 With regard to Policies EL11 and EL12, the modifications below have been proposed by IKEA to ensure that the aspirations of these policies are sought where this will be practical and suitable, rather than in all cases:

- EL11:
 - To replace the word “must” in the first paragraph with “will seek to”;
 - To modify the third bullet point to state: “~~Provide for Encourage~~ *the modification and adaptation of buildings and layout, **where practical** including those of existing retail operators, so that they support comprehensive regeneration*”;
 - To remove the words “Set out an” from the beginning of the fourth bullet point and replace with “An”;
 - To modify the ninth bullet point to state: “Include green walls, where practical **and viable**, to provide visual interest, mitigate climate change and support biodiversity”;
 - To modify the tenth bullet point to state: “For commercial units, incorporate a minimum of four metres floor to ceiling height, **where practical and suitable for the business**, to allow for flexibility of use”.
- EL12:
 - To replace the word “must” in the second paragraph with “will seek to”.

2.9 Only once such flexibility has been introduced will the “level of detail and degree of prescription” in relation to Policies EL10, EL11, EL12 and their supporting paragraphs and figures be “tailored to the circumstances” of Meridian Water and “allow a suitable degree of variety where this would be justified” in line with the thrust of Paragraph 126 of the NPPF. Only then can they be deemed to be appropriate and achievable, with regard to meeting the regeneration aims and objectives of the AAP.

2.10 It is understood that the Council’s SOCG will confirm these modifications to address concerns with this aspect of the Plan.