



EDMONTON LEESIDE AREA ACTION PLAN

EXAMINATION

FINAL

Hearing Position Statement

Matter 6: Transport and Movement

Issue: Does the Plan provide an appropriate framework for movement throughout the Plan area in accordance with the aim of the Framework to maximise sustainable transport solutions?

i. Is the Plan supported by an adequate Transport Assessment? Can it adequately support a modal shift given the reliance of current occupiers on cars?

The Plan area as a whole has been subject to numerous transport studies as the proposals have evolved over time and various challenges and opportunities have been identified. These studies include the Enfield Core Strategy Transport Assessment (August 2009) and the Upper Lee Valley Transport Study (November 2012). Both of these reports included high level strategic modelling with recommended measures and interventions. These have informed the proposals set out in the ELAAP and further detailed work will be required for the phased delivery of development, particularly at Meridian Water and any discrete planning applications brought forward on individual sites.

The proposed strategy for delivering Meridian Water is a phased approach, with Transport Assessments to be submitted for separate items of infrastructure and parcels of development at the most appropriate time. The Meridian Water masterplan will be built out over a long timescale and this approach provides flexibility to respond dynamically to both highways and public transport conditions and evolving policy. Each planning application will be subject to discussions with Transport for London (TfL) and London Borough of Enfield's (LBE) transport team amongst other stakeholders and the scope of the modelling work will be agreed in advance of submission.

This is in keeping with the planning application process that has been undertaken to date, where preliminary, high-level strategic modelling work for the masterplan was undertaken to inform discussions around Phase 1 of Meridian Water for the first phase delivery of 725 residential units (planning ref: 16/01197/RE3), alongside the new Meridian Water station building. The strategic modelling work [Appendix 1a] was requested by TfL during the pre-application process to ensure that if there were any strategic implications of the development, TfL can plan for them in subsequent phases and to provide assurance that Phase 1 proposals do not constrain their ability to

improve transport links in the area in the longer term. The aim was to minimise unnecessary work whilst still giving TfL an understanding of the strategic implications of the development.

The preliminary strategic modelling work which accompanied the Phase 1 application tested a number of highway network and housing options:

- 5,000 homes and 3,000 jobs;
- 10,000 homes and 6,000 jobs;
- Development network options including Argon Road extension and the central spine road; and
- Development network options including Leaside Road to Argon Road link and central spine road.

Specific traffic flow increases as a result of the masterplan was identified on the A406 North Circular Road, A1055, Cook's Ferry Roundabout approach, Leaside Road and Walthamstow Avenue. The higher of the two development demand scenarios results in a greater area of impact and greater flow increases.

The strategic modelling work and report were issued to TfL for discussion post-submission of the planning application but before it was determined. As set out in the Greater London Authority (GLA) Stage 2 report, [Appendix 1b] and also in the LBE Planning Committee Report, [Appendix 1c] TfL confirmed that concerns raised at consultation stage regarding the Transport Assessment and other supporting documents have been resolved and there were no other transport points that needed further clarification from the applicant. Phase 1 received planning consent in July 2017.

TfL has requested that a similar modelling approach is taken for the next phase of development to provide assurances on the impact of the masterplan on the wider network. This more detailed strategic modelling work would be progressed alongside the Phase 2 development application which would reflect the latest version of the Masterplan.

Furthermore, an updated Upper Lee Valley Transport Study has been commissioned by TfL to help deliver the revised Opportunity Area Planning Framework (OAPF) for the Upper Lee Valley (ULV) and assess options for investment in sustainable transport including enhanced bus services. The study has involved strategic modelling assessments which take into account the proposed quantum of development at Meridian Water. The related report identifies short-term, medium-term and long-term challenges and tests a range of interventions. A package of measures, identified to be the most effective and appropriate to take forward, has been tested, which included the following:

- Cycle Enfield and low-car usage schemes;
- M25 Junction 25 improvements;
- Enfield – Barking Rail Link; and
- Central Line (New Tube for London) Upgrade.

This work has been completed and signed-off by TfL. The OAPF, of which the transport study is part, is currently under development by the GLA, however there are no current timescales as to when the completed OAPF will be publicly released.

The studies undertaken to date are considered to be adequate and proportionate to the purposes of the ELAAP. As such detailed Transport Assessment has not been prepared solely to support the proposals contained within the ELAAP. As indicated above more detailed modelling of the Meridian

Water proposals is progressing and would then provide a finer grained assessment of the local network.

In relation to modal shift, the Enfield Core Strategy Transport Assessment (2009) recognised high car mode split as one of the key issues and identified measures to improve this by influencing travel choices and improving public transport provision and walking and cycling facilities. LBE is committed to encouraging sustainable travel patterns (Core Strategy Policies 24, 25 and 26; Development Management Document Policies 45 and 47). The impact of a modal shift has been tested in the Upper Lee Valley Transport Study (2012) which included an intervention scenario where a combined walk and cycle mode share of 36% was achieved.

The ELAAP sets out measures to support a modal shift (Section 11.3; Policies EL7, EL21, EL23 and EL25 of the Plan). The Plan indicated that for 10,000 units, the average parking ratio across the Meridian Water is expected to be 0.49. This is below the existing car ownership in the local area. Phase 1 of the Meridian Water development received outline planning consent for car parking at a ratio of down to 0.4 spaces per unit. Together with other sustainable travel measures and public transport provision, this illustrates that significant modal shift can be supported.

Discussions are ongoing with TfL who are also supportive of lower car parking provision on a site which will be served by a new station and can form a nexus in the bus network. In addition, the masterplan will follow Healthy Streets principles and support the Mayor's ambition to achieve 80% of all trips being by walking, cycling and public transport by 2041. Enfield's Local Implementation Plan 3 (LIP3) is committed to achieve a proportionate mode share of this target and the aim is to achieve 69% of all trips in the borough by walking, cycling and public transport by 2041.

ii. Are references to uplifts in PTALs realistic given that transport improvements of train services are not committed?

The references to uplifts in PTAL (refer to ELAAP Part B, paragraphs 5.3.27 to 5.3.29) provide a guide to the level of public transport intervention which could be required to support the different housing development scenarios. The PTALs have not been specifically calculated based just on assumed improvements to existing train services which are not yet committed. Planned and proposed bus service improvements have also factored into the PTAL calculations. It is envisaged that a combination of different public transport interventions would be required to improve the public transport accessibility of the Plan area which would be delivered over the long term. A site-specific assessment of the PTAL at Meridian Water was included in the Enfield Core Strategy Transport Assessment (August 2009) which demonstrated this.

The Council, together with TfL, neighbouring authorities and developers, will be looking to improve public transport accessibility where possible. A number of different public transport interventions were tested as part of the future year assessments contained within the ULV strategic modelling for the OAPF and out of that there have been further focused studies by TfL with the support of others regarding Bus Priority and the potential to introduce new outer London radial transit routes in line with the aspirations set out within the Mayor's Transport Strategy (2018).

It should be noted that Policy D6 of the emerging Draft London Plan (with Minor Suggested Changes, August 2018) states that in preparing Development Plans and area-based strategies, boroughs should follow the approach that the density of development proposals should be based on, and linked to, the provision of future planned levels of infrastructure provision rather than existing levels. The optimal development density should take into account accessibility by walking, cycling, and existing and planned public transport access to jobs and services (including both PTAL and

access to local services). Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean that if the development is contingent on the provision of new infrastructure, including public transport services, it will be appropriate that the development is phased accordingly.

The Draft London Plan moves away from a residential density matrix which is solely linked to PTAL in order to promote the most efficient use of sites. A greater emphasis is on access to jobs and services. To respond to this, the plan advocates a mixture of land uses across the Edmonton Leaside area and also in the immediate local area which can be accessed by walking and cycling. Therefore, it is not expected that public transport alone would be required to support the proposed density.

The above demonstrates that the proposal to increase PTAL over time and a phased approach to deliver development across the key sites is in keeping with emerging London Plan policies.

iii. How can the implementation of improved public transport links to and through the Plan area be best secured?

As set out in Part D of ELAAP, the Council are investing in the transformation of Meridian Water using a range of funding sources. Alongside government and developer contributions, the Council's Community Infrastructure Levy (CIL) adopted in 2016 will support in achieving sustainable growth in the Plan area through pooling developer contributions and spending monies generated towards major infrastructure in Meridian Water. CIL receipts to date have been spent on the new station currently under construction at Meridian Water; and delivery of road and rail infrastructure in Meridian Water, as per Enfield's Regulation 123 List.

As set out in Part D of ELAAP, the new Meridian Water station is key to the delivery of improved public transport provision and will be completed in early 2019. The new station will be served by the new Stratford to Angel Road (STAR) services with a doubling of peak and off-peak frequencies. Meridian Water station is the first piece of infrastructure secured to improve the public transport accessibility in the area.

The Council, with the support of the Greater London Authority (GLA), are progressing a bid to forward-fund and secure the delivery of strategic infrastructure through central government's Housing Infrastructure Fund (HIF) funding programme.

This HIF bid will seek to secure the following:

- Rail improvements to increase service frequency at Meridian Water station; and
- A range of strategic infrastructure, including a central spine road to improve east-west connectivity, pedestrian/cycle links, bridges, earthworks, remediation, flood alleviation and associated landscaping, and utilities, as well as associated demolition works.

On 20th March 2018 the MHCLG confirmed that the GLA/Council had successfully passed the first stage of the Forward Funding bid process and that the Council's bid would be taken forward to the second stage to be submitted in December 2018.

To demonstrate its commitment to the infrastructure required to deliver Meridian Water, the Council at its own cost is moving forward with planning applications for the non-rail infrastructure, alongside procuring contractors to deliver the works.

Funding has already been secured from the Meridian Water Phase 1 planning application to support the delivery of schemes to improve links through the Meridian Water hinterland. This should encourage more people to use sustainable modes of transport to access goods and services.

Going forward the provision of improved bus services will be key to delivering improved connections to and from the ELAAP area. The original OAPF work identified a number of specific improvements. This has formed the basis for further work as part of the transport assessment supporting the revised OAPF and this will evolve as further phases of development come forward.

The adoption of the AAP will help to support the proposed public transport improvements and the proposal is to develop and adopt a new Supplementary Planning Document for the Meridian Water area to help implement the aspirations for the area and secure funding for the proposed improvements.

iv. Does the Plan make adequate provision for east west movement by public transport / bus routes through the site? How will this be supported? Does it recognise the needs of existing occupiers, including bus operators?

Whilst currently it is accepted that east-west journeys through the area are disrupted by numerous barriers to movement, in particular the railway line, the A406, Meridian Way, the large industrial estates and the Lee Valley waterways and reservoirs, the infrastructure proposals at key sites such as Meridian Water are focused on improving permeability and reconnecting east-west movements. Whilst more detailed proposals will come forward in future to resolve these barriers the most developed interventions are at Meridian Water.

A new central spine road through Meridian Water – commonly referred to as the Causeway – will provide a strong, attractive and welcoming east-west route through the site, allowing new access and connecting a previously fractured site. New bridges and linkages will open up this part of the borough and increase access to the Lee Valley Regional Park. The central spine road will be designed to prioritise walking, cycling and buses. New high-frequency bus services, including diversions of east-west routes already operating on the A406 – North Circular Road, should significantly improve east-west movement. During the design process of delivering Meridian Water masterplan a number of options will be explored and considered.

The proposals will be designed with flexibility in mind to allow for the potential for the measures to evolve over time, for instance, allowing for flexibility in the bus priority measures to respond to more detailed modelling and assessment, and implementation of transport policies. To progress with these options, further testing and discussions with TfL will need to take place. As indicated above in response to Question (i) (page 2) modelling is being progressed alongside the Phase 2 application which would test different design strategies for the central spine road and car parking levels to determine optimum options to take forward to ensure that there is flexibility to deal with different demands as measures evolve over time. This would then be assessed in the subsequent Transport Assessments for the future phases of development.

Policy EL23 of the Plan is therefore considered to be adequate in providing the parameters to east-west movements through facilitating improvements to the bus network and services, whilst providing flexibility to implementing the bus priority schemes at the most appropriate time.

It is important to note that these interventions will improve east-west movement for existing occupiers across not just the Meridian Water site, but the wider Edmonton Leaside area and further

afield. However, these interventions are key to unlocking and facilitation comprehensive redevelopment of the Meridian Water masterplan area.

Prior to the completion of the full masterplan, access will be maintained for all existing occupiers, including Tesco, Ikea and the Arriva bus garage. Stakeholder engagement is ongoing to ensure that interim needs are met prior to the completion of the full masterplan.

Initial detailed transport work has been undertaken to assess the implementation of the central spine road on the access to existing businesses operations including design drawings and junction modelling work to test potential effects. This work has been completed to resolve potential issues that may occur during the early stages of development, when the central spine road is first constructed and housing development has yet to be come forward. The outputs of this work were summarised in a report prepared by Arup (Appendix 2). Further assessments will be undertaken to test the potential effects of the housing development as part of future planning applications.

Designs have also been prepared to ensure that access to the Arriva bus garage will be maintained when the central spine road is implemented. Highway works will be undertaken to the local network and adequate arrangements are proposed to ensure that buses can manoeuvre and access is retained. These plans were discussed at a meeting with Arriva, TfL and LBE on 29th August 2018 and feedback received will be considered during further refinement of the designs.

The Plan makes adequate provision to resolve existing barriers for east-west movement through the proposed interventions and it also promotes comprehensive regeneration of a number of key sites within Edmonton Leaside. At Meridian Water, the proposed redevelopment of the existing employment land will require the relocation of a number of the existing occupiers. The Council will work with them to find suitable locations in terms of size and surrounding land uses. If businesses are required to be relocated, the Council will work with owners (and occupiers), prior to any development taking place, to relocate to appropriate premises in employment or mixed-use areas defined in the AAP area, or other locations within the borough. For other existing occupiers and for those that will remain in their current locations, work is being undertaken simultaneously outside of the plan to resolve potential issues that may arise in the interim when infrastructure is being delivered and how it will operate in the future.

v. Does the Plan provide for appropriate levels of parking?

Whilst the Plan addressed the need and use of cars across the Plan area, the Plan itself does not set specific parking standards. Car parking will be provided in accordance with the London Plan and Enfield's Development Management Document (DMD) documents, as set out in Section 11.8 and paragraphs 5.8.19 to 5.8.22 of the Plan.

The Plan recognises that it is likely that the parking ratio will vary across the site to reflect changes in the level of access to public transport and increased opportunities for active travel.

For the specific case of Meridian Water, the spatial scenario testing indicated that at 10,000 units the optimal level of residential car parking would be an average of 0.49 cars per unit. However, as per the transport assessment and subsequent granting of planning permission, the Council's view is that parking provision lower than this can be achieved for Phase 1 of Meridian Water, as referenced in the response to Question (i) where a 0.4 parking ratio was approved.

The Plan's objectives aim to delivery sustainable regeneration including the conditions for enhanced rail and bus connectivity for Meridian Water to deliver development that should maximise the use of sustainable transport, in line with the Mayor's Transport Strategy and the Draft London Plan and

where appropriate to reduce car parking. It is considered that the Plan does provide an appropriate guide to the levels of parking, without being too prescriptive to allow flexibility in the future to reduce parking; responding to the progress of the Mayors Transport Strategy, London Plan, improvements to public transport and the provision of shops, services and employment opportunities locally.

vi. How are the needs of cyclists and pedestrians reflected in the Plan?

The Plan recognises that walking and cycling in Edmonton Leaside can be difficult. Whilst the area has some good connections running north-south through the Lee Valley Regional Park, connections to these routes are often poor quality and do not encourage safe journeys. Making walking and cycling a pleasant and convenient means of getting around is vital to securing a modal shift (paragraph 11.1.2).

Significant investment is already being made in Enfield's cycling and walking infrastructure to encourage more people to use these sustainable and healthy modes, for example through the £42m Cycle Enfield programme. It is recognised that access to key sites, such as Meridian Water, from the wider network and links to other key centres will be an important element of the transport offer, as set out in paragraph 5.8.18 of the Plan.

The Plan provides, in detail, the proposed walking and cycling improvements. This includes creating new routes, improving existing routes, and ensuring that cycle parking is provided where required. The key sections in the Plan are as follows:

- Policy EL21: Improving the Quality of the Pedestrian and Cycling Environment
- Policy EL22: Proposed Route – Improvement Principles
- Policy EL12: Public Realm at Meridian Water
- Section 11.3: Encouraging Modal Shift
- Section 11.4: Improving Key Pedestrian and Cycle links
- Figure 11.1: Proposed Location of Key Pedestrian and Cycle Routes

At Meridian Water, the new Masterplan will provide a range of mixed land uses, including schools, employment and social infrastructure, and these will be suitably located within walking and cycling distance of future residents so that the day to day needs of residents can be met without the need for a private car. Walking and cycling are at the forefront of the design for the masterplan with the proposed central spine road being the key piece of infrastructure that will resolve barriers to movement and will prioritise movement by Active modes. The street-level design will be for people, not vehicles, and alongside the low car parking provision this underpins the proposals for a sustainable development.

Discussions are ongoing between the Meridian Water masterplan design team, TfL and LBE Transport and other key stakeholders such as Cycling Enfield and Sustrans on how pedestrian and cycling routes and links should be designed and delivered as part of the planning process.

vii. Does the Plan appropriately take account of the potential of CrossRail2?

It is recognised in the plan that Crossrail 2 will provide additional capacity to support further growth and regeneration. However, as it is not committed, the Plan acknowledges the opportunity but is focused on overall improving public transport accessibility rather than being solely reliant on Crossrail 2. This is considered to be appropriate for the Plan.

It should be noted that as part of the revised OAPF work there has been consideration of the additional quantum of development (above the level of homes and jobs in the Plan) which Crossrail 2 could support.

viii. Should specific transport projects to deliver public transport improvements be included in Part D of the Plan?

In Part D, Table 14 on page 156 of the submitted Plan does identify key transport projects that would deliver improved public transport improvements. Further details of each project could be provided in Part D if this would add clarity and as suggested by TfL to include:

- Early bus network for Meridian Water – through Developer contributions;
- Upper Lee Valley Transport Modelling and bus priority study
- Meridian Water to Edmonton Green direct bus link

ix. 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?

The levels and structures along the central spine road alignment have been developed in detail and can be delivered. There are ongoing discussions with existing land owners to ensure that the alignment is achievable. By giving a greater level of certainty to the design and alignment of the central spine road running through the centre of the site, it will allow early delivery which will act as a catalyst for regeneration of the area, subsequently addressing housing need and will also deliver early improvements to accessibility and access.

The alignment of the central spine road articulated in Figure 5.1 takes account of the constraints imposed by the water courses through the site, and is located centrally to minimise walk distances to bus services north and south of the central spine road (maximising accessibility benefits with an efficient bus route network). The alignment needs to tie in with the Glover Drive roundabout, it also needs to cross the Pymmes and Salmons Brooks with a reasonable highway geometry. These constraints inform the alignment of the western section.

Given the existing severance on-site, most occupiers access their sites via Argon Road and Harbet Road. The central spine road will not have an impact on these roads.

The central spine road will have localised impact where it crosses existing access roads. It will join Glover Drive and this will have an impact on access to Ikea. Further design development has been undertaken and a solution proposed that would maintain access to Ikea, result in no net loss of parking spaces and allow Ikea to continue to operate with minimal impact [Appendix2].

Where the central spine road crosses over the Lee Navigation, it will sever Towpath Road as a vehicular route. Alternative routes are available from Harbet Road, but further consideration and improvements are proposed along Anthony Way to ensure that buses can manoeuvre and continue to access the Arriva depot.

The Council are in continuous consultation with all stakeholders and operators in this area to ensure that access can be maintained.

The Plan appropriately outlines the primary route and development principles of the central spine road through Policy EL6 and establishes the key criteria which further supplementary guidance and planning applications must take account. Suggested Minor Amendment Item 20 submitted in the

Schedule of Minor Amendments [ELAAP 03] acknowledges the route is subject to further technical and detailed site investigation work will refine the alignment.

Add text at the end of 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'.

x. Does the Plan consider fully the potential for waterway movement through the site? Is there a potential conflict with the aims of flood avoidance and biodiversity improvement?

The Plan does not change the current potential for waterway movement through the site, which is assumed to be principally via the Lee Navigation. Any proposed crossings of the Lee Navigation will achieve the minimum clearance specified by Canals & River Trust (2.7m) over the waterway level. This is similar to or exceeds constraints north and south of the site. The abutments of Lea Navigation crossings will be positioned to meet CRT requirements. The crossings of the Pymmes and Salmons brooks are being set to provide 600mm above the 1 in 100yr + Climate Change flood levels, as discussed with Environment Agency (EA), and the abutments will be set back from the top of the banks to offsets to be agreed with EA.

Flood mitigation measures are being developed. Currently EA flood mapping indicates flooding occurs in the industrial areas on the east and west banks of the Lea Navigation. The intention of the flood compensation areas located on land within the Lea Valley Regional Park (to the east of Harbet Road) but currently inaccessible to the public and on land adjacent to the east bank of the Pymmes Brook is to improve the biodiversity. For example, the work adjacent to the Pymmes will include the partial naturalisation of what is currently a channelised concrete brook. The flood compensation within the LVRP area is likely to be combined with surface water drainage features providing an opportunity to create enhance biodiversity character.

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

The wording of relevant policies to transport and movement within ELAAP will deliver the objectives and vision for the area. In particular Objective 3: Connectivity; Objective 4: Sustainable Regeneration and Objective 5 Lee Valley Waterways and open spaces. These objectives act as a framework for ELAAP's policies, giving them direction.

Collectively the objectives and policies will enable the Council to achieve the vision and provide sufficient flexibility to recognise that transformation will be delivered overtime. Policy EL7 Rail and Bus Improvements commits the Council to working with GLA, TfL, Network Rail and the train operating company to secure major public transport infrastructure and improvements to services.

In Part C of ELAAP, policies EL21 to EL25 provide for a package of policy measures to assist in addressing the issues of poor connectivity and embed improvements to rail, buses and cycle infrastructure that will be essential for promoting sustainable travel and reducing dependence on private car use and relieving congestion and improving the environment in the Upper Lee Valley.

Minor changes to policy wording have been put forward in the submitted Schedule of Proposed Minor Amendments [ELAAP 03] and further agreed modifications are being proposed in Statements of Common/Uncommon Ground with relevant representors.