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ENFIELD LOCAL PLAN REGULATION 19

STAGE 1 MATTERS
ISSUES & QUESTIONS

MATTER 5: KEY DIAGRAM,
SPATIAL STRATEGY AND
METHODOLOGY FOR
SELECTING SITE
ALLOCATIONS

ON BEHALF OF IKEA PROPERTIES
INVESTMENTS LTD (ID REF: 01921)

JANUARY 2025

Q210717

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1 Introduction

- 1.1 IKEA Properties Investments Ltd (“IKEA”) are a significant stakeholder in Enfield, having previously traded from their store at Glover Drive, Meridian Water, for 17 years, between 2005 and 2022 inclusive.
- 1.2 IKEA are the freehold owner of the site, containing their former store, which is allocated in the draft Regulation 19 Enfield Local Plan (“draft Local Plan”) under Allocation Reference SA5.3: *Former IKEA, Meridian Water* (site area 8.41 ha) and identified for residential led mixed use.
- 1.3 IKEA are seeking to divest their property, and following the marketing of the site in 2023, are in advanced discussions with a national homebuilder, who is proposing comprehensive development of the site for a residential led mixed use.
- 1.4 IKEA have duly made representations to the draft Local Plan, raising the following matters:
 - 1.4.1 IKEA supports residential led regeneration of the site and the surrounding Meridian Water area.
 - 1.4.2 The draft Local Plan, however, fails to properly account for the true capacity of the site in terms of housing delivery, which is significantly under-estimated considering its proximity to Meridian Water train station.
 - 1.4.3 In failing to optimise the housing delivery on the site, the draft Local Plan fails to capture the following benefits:
 - A greater level of housing delivery, across a range of tenures, including affordable housing.
 - Helping to deliver a vibrant, mixed tenured, mixed use, community.
 - Making the best use of sustainably located brownfield land, whilst delivering a new community of scale, that will help to catalyse the development of other sites in Meridian Water.
 - Making the best use of existing and proposed local infrastructure, including that funded by Central Government (including the Meridian Water train station and the more recent HIF funding awarded for delivering major transport infrastructure)¹.
 - Opportunities to deliver employment uses, especially those in demand, on that part of the site that is less suitable for residential use.
 - Assisting the Council in delivering their ambitions for 10,000 new homes at Meridian Water.

¹ The DLUHC have awarded £195m (£170m in 2020, and a further £25m in 2024) for infrastructure (naturalisation of the Pymmes Brook, two new parks, roads, bridges, footpaths and cycle links) to support the new residential and business community proposed at Meridian Water.

- 1.4.4 There are no sound grounds for supporting the scale of office floorspace proposed in the Allocation (as well as the lack of clarity in the allocation relating to office floorspace).
- 1.5 Following submission of the representations to the draft Local Plan, IKEA have engaged with Officers (and consultants of) the Council, to seek modifications to the allocation. That engagement is still ongoing.
- 1.6 IKEA are intending to be represented at the Hearing on Matter 5 (the subject of this Statement) and Matter 3².
- 1.7 This Hearing Statement goes on to demonstrate that the regeneration and growth focus on Meridian Water is justified and appropriate. Acknowledging that the Examination of Matter 5 MIQs is not intended to be site specific, as this will be addressed in future Hearing Sessions, the allocation of land known as SA5.3 in Meridian Water is framed in a manner that artificially and mechanistically suppresses the site's true capacity, and that uplifting the housing delivery numbers in the allocation and taking a more flexible approach to employment development on the site, will enable the Plan to capture a range of benefits (outlined above) through optimisation of the site's regeneration.

² 3: Employment Land Need and Supply.

2 Issue 5.1: Whether the vision and strategic objectives have been positively prepared and are justified and effective

Q5.1: Are the spatial vision and strategic objectives soundly based, justified by the evidence and is it clear how the Plan's policies will help to deliver the vision and strategic objectives over the Plan period?

2.1 IKEA raise the following matters in relation to the Spatial Vision and Strategic Objectives:

- The Vision fails to acknowledge the significant opportunity for housing growth at Meridian Water, which will be the spatial focus for the single largest area of new homes in the Borough over the Plan Period. It is, therefore, suggested that the Vision should be amended to recognise the new residential community that will be accommodated at Meridian Water.
- Suggested modifications to the Vision are set out below:
“...inclusive housing growth will be accommodated across the Borough, most notably at Meridian Water ...”.
- Table 2.1: Strategic Objectives sets a number of objectives and IKEA make the following comments:
 - Objective 4 – This objective requires “*at least 50% of newly constructed homes*” to be genuinely affordable. It is important that the Plan recognises that delivery of affordable housing may be constrained by issues of viability, and the following modifications are suggested:
“...to maximise the supply of affordable housing, by resisting the loss of affordable homes and securing, where viable, at least 50% of newly constructed homes as genuinely affordable...”
 - Objective 13 – IKEA support the objection of catering for business requirements, notably for logistics and manufacturing, in appropriate locations. IKEA have demonstrated in their representations to the draft Local Plan that Allocation SA5.3 is appropriate, in part, for logistics and manufacturing. The Allocation acknowledges this.
 - Objective 15 – Notes that “*new office development*” is supported in Meridian Water, amongst other areas. The inappropriateness of Meridian Water for office development is addressed in IKEA’s statement on Matter 3: Employment Land Need and Supply. It is demonstrated that Meridian Water is not likely to deliver office floorspace, given a range of factors. IKEA, therefore, respectfully request the following changes to Objective 15:
“...to support new office development in Enfield Town and the District Centres and Meridian Water where there is a demonstrable demand...”

3 Issue 5.2: Whether Policy SS1 establishes an appropriate spatial strategy, taking into account reasonable alternatives

The spatial strategy is set out in Policy SS1. This identified the scale of growth proposed (discussed specifically under Matters 2 and 3). The policy states that a major focus will be on previously developed sites, regeneration areas in the east of the Borough and London Plan Opportunity Areas at Meridian Water and New Southgate. The spatial strategy is supported by the 11 'Placemaking' areas in Chapter 3.

General Matters

Q5.2: Is the spatial strategy for the scale and distribution of growth, set out in Policy SS1, justified and appropriate for the sustainable development of the area when considered against reasonable alternatives? What reasonable alternatives were considered by the Council and why were these rejected?

- 3.1 IKEA Support the spatial distribution of growth in Policy SS1: Spatial Strategy, in relation to Meridian Water (Policy PL5) which is identified as one of the four main placemaking areas.
- 3.2 However, for the reasons outlined in IKEA's representations to the draft Local Plan the scale of growth at Meridian Water, most notably in respect of Site Allocation SA5.3 is a significant underestimate of (i) the true capacity of delivery, and (ii) the trajectory of delivery. Most notably, the site has the capacity for a significant increase in housing delivery (in a shorter timeframe) than that suggested in the Plan, having regard to a design-led approach.
- 3.3 The greater scale of growth opportunity at Meridian Water will have a beneficial spatial planning effect, by increasing delivery, on the stepped housing trajectory in the draft Local Plan³.
- 3.4 Maximising housing development on well located previously developed land will potentially reduce the need to delivery housing on less appropriate sites, such as those in the Green Belt.

Q5.3: Other than those specifically referred to in Policy SS1 (ie, PL5, PL6, PL10, PL11 and New Southgate (PL7)) is it clear how the 'place making' areas relate to the overall spatial strategy and the purpose they serve in delivering the overall strategy?

- 3.5 IKEA have no comments in response to this question at this point in time but reserve the right to participate in the discussion on this Question at the Examination.

³ Paragraphs 2.31-2.34 and Figure 2.5.

Strategic Approach to Minimising Flood Risk

Q5.4: Is the spatial strategy consistent with national policy on flood risk? Has the Plan been informed by a Strategic Flood Risk Assessment based on the most up-to-date flood risk data and climate change allowances and taking advice from the Environment Agency?

- 3.6 IKEA have no comments in response to this question at this point in time but reserve the right to participate in the discussion on this Question at the Examination.

Q5.5: Can the Council demonstrate that the Plan takes a sequential, risk-based approach to the location of development, so as to avoid where possible flood risk to people and property?

- 3.7 IKEA have no comments in response to this question at this point in time but reserve the right to participate in the discussion on this Question at the Examination.

Q5.6: Is the Plan consistent with the actions set out in paragraph 167a)-d) of the NPPF, namely applying the sequential test, safeguarding land from development that is required, or likely to be required for current or future flood management, using opportunities provided by new development to reduce the causes and impacts of flooding and demonstrating how changes to flood risk arising from climate change have been taken into account?

- 3.8 IKEA have no comments in response to this question at this point in time but reserve the right to participate in the discussion on this Question at the Examination.

Q5.7: Further to the above, are any of the locations identified for growth in the Plan within Flood Zones 2 and 3? If so, has the exception test been carried out and are the conclusions of this justified?

- 3.9 IKEA have no comments in response to this question at this point in time but reserve the right to participate in the discussion on this Question at the Examination.

Strategic Transport Issues

Q5.8: Have the cumulative effects on the transport network been robustly assessed?

- 3.10 IKEA have no comments in response to this question at this point in time but reserve the right to participate in the discussion on this Question at the Examination.

Q5.9: What strategic transport issues have been identified that would require mitigation to enable the scale of growth envisaged to be delivered?

- 3.11 IKEA have no comments in response to this question at this point in time but reserve the right to participate in the discussion on this Question at the Examination.

Q5.10: What transport infrastructure, or other mitigation schemes, have been identified that would address these transport issues? Has the likely effectiveness of proposed transport mitigation schemes been assessed?

- 3.12 IKEA have no comments in response to this question at this point in time but reserve the right to participate in the discussion on this Question at the Examination.

Q5.11: Are there any outstanding concerns on transport matters from Transport for London, National Highways or any other relevant transport authorities?

- 3.13 IKEA have no comments in response to this question at this point in time but reserve the right to participate in the discussion on this Question at the Examination.

Q5.12: Is the spatial strategy and scale of growth justified and consistent with national policy in respect of the effect on air quality?

- 3.14 IKEA have no comments in response to this question at this point in time but reserve the right to participate in the discussion on this Question at the Examination.

Q5.13: Is the Plan effective in ensuring adequate provision of infrastructure and local services to deliver the spatial strategy, in particular those relating to education, health and green infrastructure?

- 3.15 IKEA have no comments in response to this question at this point in time but reserve the right to participate in the discussion on this Question at the Examination.

Q5.14: Does the evidence on whole plan viability and infrastructure demonstrate that the spatial strategy can viably deliver the housing, employment floorspace and infrastructure requirement to support the growth proposed?

- 3.16 IKEA have no comments in response to this question at this point in time but reserve the right to participate in the discussion on this Question at the Examination.

Q5.15: In general terms, does the Whole Plan Viability Assessment⁴ use a robust methodology and is it based on proportionate up-to-date and accurate data?

- 3.17 IKEA have no comments in response to this question at this point in time but reserve the right to participate in the discussion on this Question at the Examination.

⁴ Document VIA1.

4 Issue 5.3: Whether other aspects of Policy SS1 are justified, effective, consistent with national policy and in general conformity with the Local Plan

Q5.16: Are the overarching approaches to Town Centres, Residential Communities and Metropolitan Open Land, as set out in criteria 7, 8 and 9 of Policy SS1 justified, effective and consistent with national policy?

- 4.1 In relation to Criterion 7 of Policy SS1 (ie, Town Centres), IKEA note that with the exception of Meridian Water, all Town Centres referenced in this criterion are existing.
- 4.2 IKEA support the development of a new Town Centre at Meridian Water, as part of the overarching placemaking and its suitability as a major urban foci for growth of employment, retail, leisure, housing, community and cultural uses. As such, the evidence is justified, effective and consistent with National Policy, albeit Criterion 7 should recognise that Meridian Water will be a new Town Centre and, consequently, should be differentiated from the existing Town Centres. Consequently, IKEA recommend the following changes to Criterion 7 of Policy SS1:

“Enfield Town, Edmonton Green, Palmers Green, Southbury, Southgate, New Southgate, Angel Edmonton and the future Town Centre at Meridian Water will be major urban foci of high quality growth...”

- 4.3 Furthermore, To improve the effectiveness of the Policy the general extent of the future Town Centre at Meridian Water should be explained as it is presently not defined in the draft Local Plan. It is, however, generally defined in the recently adopted Meridian West SPD⁵ where the indicative extent of the Centre is illustrated⁶. For clarity, the general extent of the Town Centre should be referenced within Policy SS1, by a cross-reference to the adopted SPD.

⁵ Meridian West Supplementary Planning Document (June 2023).

⁶ Figure 4.6 of the Meridian West SPD.

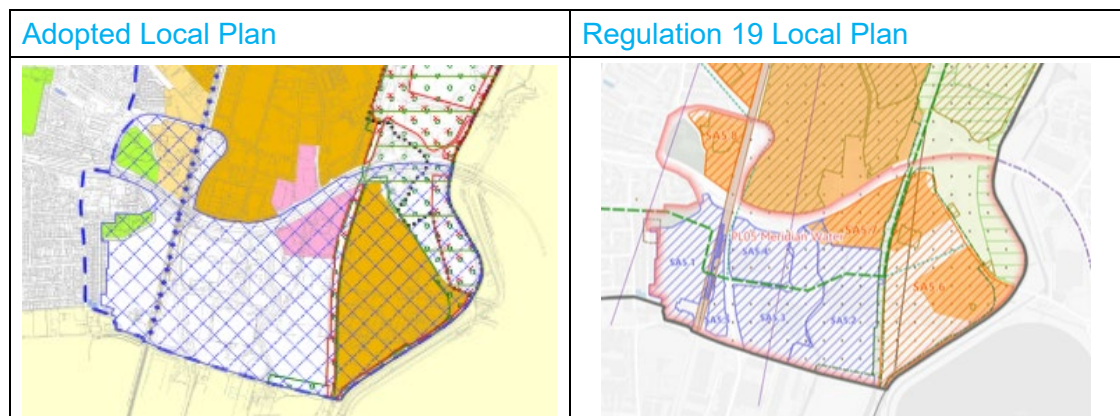
5 Issue 5.4: Whether the Key Diagram effectively illustrates the spatial strategy and indicates the broad locations for development in the Plan

Q5.17 Does the Key Diagram (Figure 2.4) effectively and accurately illustrate the spatial strategy?

5.1 Specifically in relation to Meridian Water, ie, the area of principal concern to IKEA, IKEA consider that it has, in principle, been effectively and accurately illustrated on Figure 2.4, of the draft Local Plan (see Figure 5.2 below) subject to the following:

5.1.1 The general extent of Strategic Industrial Land (“SIL”) is much reduced from that in the adopted Local Plan (see the comparison in **Figure 5.1** below).

Figure 5.1: Comparison of the Extent of SIL in the adopted and emerging Local Plan



5.1.2 For the reasons outlined in IKEA’s Matter 3 Hearing Statement, the Council’s intention to reduce the scale of SIL is unjustified in light of the Council’s employment land evidence. Therefore, the SIL designation should remain unchanged from the adopted Local Plan, and the depiction of the Harbutt Road SIL should, therefore, follow that of the adopted Local Plan.

Figure 5.2: General Extent of the Meridian Water Area



5.1.3 The Plan lacks precision and is, therefore, not effective in Figure 2.4’s reference to “intensification around transport nodes and Town Centre” and “gentle densification areas”. There is no definition within the draft Local Plan or what is anticipated in terms of density of development in either of these two concepts.

5.1.4 It is demonstrated in the representations to the draft Local Plan that the Plan has underestimated the density of development that is achievable on the IKEA site, and greater clarity is clearly necessary in respect of what is expected in terms of density of development.

Q5.18: Is the key diagram accurate with regard to the following factors:

- a) the extent of the Green Belt and Metropolitan Open Land (MOL)?*
- b) the relationship between the concept of ‘gentle densification’ and MOL? Is it the case that the Plan allows for ‘gentle densification’ within areas of MOL?*
- c) the relationship between the concept of ‘gentle densification’ and areas identified for ‘intensification around transport nodes and town centres’? Are these two policy approaches compatible?*

5.2 Please refer to paragraphs 5.1.3 and 5.1.4 above in relation to the terminology/concept of densification/intensification. Nowhere in the Plan is there any clarification as to what is considered to be either “gentle densification” or “intensification around transport nodes and Town Centres”, and as such the draft Local Plan is not effective in this respect.

Q5.19: Is the relationship between concepts identified on the Key Diagram and Policy clear? For example, is the Plan clear how 'gentle densification' and 'intensification around transport nodes and town centres' will be implemented?

- 5.3 Please refer to paragraphs 5.1.3 and 5.1.4 above in relation to the terminology/concept of densification/intensification. Nowhere in the Plan is there any clarification as to what is considered to be either “*gentle densification*” or “*intensification around transport nodes and Town Centres*”, and as such the draft Local Plan is not effective in this respect.

6 Issue 5.5: Whether the allocations in the Plan have been selected using the appropriate methodology based on proportionate evidence

The following questions relate to the site selection process and general approach to allocations. Issues relating to specific sites will be considered under separate Matters. Therefore, references to individual allocations are not necessary unless used as examples of how the process has been carried out.

The site selection methodology is set out in the Site Allocations Topic Paper⁷. The Council's responses to PQ7 to PQ9 provide additional information, particularly in respect of how 'strategic' and employment sites were assessed.

Q5.20: Is the approach to the assessment and selection of sites, as set out in the Site Allocations Topic Paper justified? Does the submitted evidence demonstrated that the sites have been selected on a robust, consistent and objective basis?

- 6.1 IKEA have no comments in response to this question at this point in time but reserve the right to participate in the discussion on this Question at the Examination.

Q5.21: Was the criteria used in the initial sift of sites (Stage 1 of the process) justified, in particular, the 'absolute constraints'

- 6.2 IKEA have no comments in response to this question at this point in time but reserve the right to participate in the discussion on this Question at the Examination.

Q5.22: Paragraphs 4.5 and 4.6 of the Site Selection Methodology paper refer to sites that fell within priorities 1 and 2 being generally considered suitable for development, but with some exceptions, and sites that fell within priority 7 and 8 were generally considered unsuitable but with some exceptions. On what basis were the 'exceptions' justified and is it clear which sites fall into which category?

- 6.3 IKEA have no comments in response to this question at this point in time but reserve the right to participate in the discussion on this Question at the Examination.

Q5.23: Are the reasons for selecting some sites and rejecting others clearly set out and justified?

- 6.4 IKEA have no comments in response to this question at this point in time but reserve the right to participate in the discussion on this Question at the Examination.

⁷ Document TOP2.

Q5.24: Were constraints to development, such as transport, flooding, landscape character, heritage and mineral safeguarding appropriately taken into account as part of the selection process?

- 6.5 It is explained in the Site Allocation Topic Paper (2024) that the site capacity estimate is set out within the Housing and Economic Land Availability Assessment (“HELAA”)⁸, which suggested that a “bespoke approach” was typically undertaken for larger sites⁹. Whilst it was suggested that a greater level of site assessment sophistication has been adopted for larger sites, it remains unclear on larger sites, such as SA5.3, how the scale of development has been determined.
- 6.6 Taking Site SA5.3 as an example, the HELAA 2023 site proforma for this site (reference UPC1)¹⁰ demonstrates that the site has no constraints (either Level 1 or Level 2), whilst recognising that it is available, achievable and developable for residential purposes, and has an assumed a capacity for 1,507 homes. It is, however, unclear how this scale of new homes has been determined, other than through a standard typology density matrix. In more recent discussions it has been acknowledged by the Council that the opportunity for delivery of new homes on this site is significantly greater¹¹ than that suggested in the draft Local Plan.
- 6.7 It is suggested in the Site Allocation Topic Paper 2024 that the bespoke approach involved the consideration of further evidence and stakeholder engagement (with site promoters), although it is not clear how this engagement has manifest itself in terms of Site Allocation SA5.3. By way of example, evidence was presented to the Council as part of the previous Call for Sites that the site has a significantly greater capacity than is currently proposed in the draft Local Plan and at no point during IKEA’s engagement with the Council has the proposed allocation 1,507 been justified by any specific evidence.
- 6.8 In answer to Q5.24, therefore, whilst it is suggested that constraints to development have been taken into account in the site selection process and capacity, it is not clear how this has been applied specifically to sites such as SA5.3. This is especially notable, given that the HELAA proforma suggests that there are no constraints to development of this site.

Q5.25 Where mitigation was deemed to be required, how was this determined and have measures been subject to assessment of viability?

- 6.9 IKEA have no comments in response to this question at this point in time but reserve the right to participate in the discussion on this Question at the Examination.

⁸ Paragraph 5.19 of the Site Allocation Topic Paper 2024.

⁹ Paragraph 5.20 of the Site Allocation Topic Paper 2024.

¹⁰ HELAA 2023 Appendix E – Full Assessment of Potential Sites – Part 2.

¹¹ In discussions between IKEA’s representatives and the Council’s representatives, it has been suggested by the Council that the site has the capacity to deliver a minimum of 2,000 homes.

Q5.26: Has the site selection process ensured the allocation sites are consistent with the spatial strategy, as set out in Policy SS1?

- 6.10 Regardless of the site capacity objections raised by IKEA, and the appropriateness of the scale of the allocation proposed within the Plan, the site selection process in terms of sites in the Meridian Water Area are consistent with the spatial strategy of Policy SS1.
- 6.11 IKEA support the urban regeneration focus of the Meridian Water area, given its clear sustainability credentials. However, the opportunity for delivering more homes on previously developed land will possibly minimise the level of greenfield (and Green Belt) land take required to meet the Council's development needs. On this basis it is arguable that the site selection process has been inappropriately weighted to Green Belt release.

Q5.27: Have any additional sites been proposed to the Council since the renewed call for sites in July 2022? If so, have these been assessed during the same methodology? Is this clearly documented?

- 6.12 IKEA have no comments in response to this question at this point in time but reserve the right to participate in the discussion on this Question at the Examination.

7 Issue 5.6: Whether Policy SS2 is justified, effective, consistent with national policy and in general conformity with the London Plan

Policy SS2 is an overarching policy which forms part of the 'spatial strategy' for the Plan. It also directly relates to a number of other policies relating to design and the quality of development.

Q5.28: Is the threshold of 50 dwellings or 500 sqm of non-residential floorspace for the preparation of a masterplan justified and likely to be effective? Would preparation of a masterplan for a development of this scale be unduly onerous?

- 7.1 IKEA have no comments in response to this question at this point in time but reserve the right to participate in the discussion on this Question at the Examination.

Q5.29: Is the threshold of 100 dwellings for the submission of a planning brief justified and likely to be effective? Would preparation of a planning brief for a development of this scale be unduly onerous?

- 7.2 IKEA have no comments in response to this question at this point in time but reserve the right to participate in the discussion on this Question at the Examination.

Q5.30: Is the Plan clear as to when masterplans or planning briefs must be prepared and the mechanism by which they would be approved?

- 7.3 IKEA have no comments in response to this question at this point in time but reserve the right to participate in the discussion on this Question at the Examination.

Q5.31: How would Policy SS2 be used in decision making? Are matters covered addressed in more detail in other policies in the Plan? Are there any parts of Policy SS2 that are not addressed by other policies?

- 7.4 IKEA have no comments in response to this question at this point in time but reserve the right to participate in the discussion on this Question at the Examination.

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