

Planning Department
Enfield Council
Civic Centre Silver Street
London
EN1 3XA

Date: 13 September 2021

Our ref: 61600/01/PW/AVi/20176940v2

Dear Sir/Madam,

Draft Enfield Local Plan Regulation 18: Main Issues and Preferred Approaches Consultation – Representations on behalf of WM Morrison Supermarkets PLC

Introduction

On behalf of our client, WM Morrison Supermarkets PLC ('Morrison's'), we are pleased to submit representations to the Enfield Council Draft Local Plan Regulation 18 Main Issues and Preferred Approaches consultation. Morrison's own an existing food store and Petrol Filling Station ('PFS') at Southbury Road. We also enclose with these representations design feasibility work for the Morrison's site that has been prepared by architects TP Bennett.

Morrison's identified its Southbury Road store and car park as having the potential to be optimised with new development. Morrison's is looking to replace their existing store with a new Morrison's store and introduce residential uses, whilst maintain continuity of trade throughout.

The Southbury Road site was submitted in the Call for Sites in December 2019 and has subsequently been included as a draft allocation in the Draft Local Plan (site reference SA10).

These representations focus on draft policies which are relevant to future planning and development of the Morrison's, Southbury Road site.

The representations comment on the following questions and draft policies:

- 1 SS1 Spatial Strategy (Question1);
- 2 SP PL2 Southbury (Question 1 and Question 2);
- 3 SP H1 Housing Development Sites;
- 4 Site Allocation SA10: Morrison's, Southbury Road;
- 5 DM DE6 Tall Buildings; and
- 6 SP T1 Promoting Sustainable Transport.

SS1 Spatial Strategy

Question 1: Do you consider the Council has selected the right spatial strategy option as its preferred option?

Morrisons supports the spatial strategy and its identification of Southbury as a Placemaking area that should be a focus for growth. Subject to comments in these representations, Morrisons welcomes the inclusion of its site as a development site in the Southbury Placemaking area.

Morrisons looks forward to working with the Council to play a role in delivering the spatial strategy.

SP PL2 Southbury

Question 1: Does the vision for Southbury set out an appropriate vision for the future of this place? If not, what components do you think should be changed or are missing?

Morrisons supports the Council's vision for the Southbury area and their site's role within it. Morrisons also supports recognition of the intensification of the Southbury area, and acknowledgement of it as a location appropriate for taller buildings.

The current drafting of Draft Policy PL2, paragraph 2 references that development should provide an appropriate mix of uses and indicates that development should lead to no net loss in the quantum of non-residential floorspace to be delivered on each site. The policy drafting is considered unnecessarily negative in its framing and this may cause unnecessary challenges for development coming forward. In the case of the Morrisons site, the size of the re-provided Morrisons store is not yet known. It will be designed to meet operational and customer requirements which may be a smaller, but a more efficient store. If a smaller store is required, then the onus should not be put on the applicant to make a viability case.

There may also be potential to accommodate other commercial uses at ground floor alongside the convenience store. Again, this would be established as and when a scheme comes forward.

To allow for more flexibility, whilst still meeting needs of plan, we propose the following amendments to paragraph 2:

*2) provide an appropriate mix of uses with potential for creation of a new local centre. The quantum of non-residential floorspace delivered on each site should **serve the needs of the site and wider area. lead to no net loss, unless it can be demonstrated this is not viable. This should be achieved by offsetting any reduction in retail floorspace by provision of appropriate employment, leisure uses, community and cultural facilities.***

Question 2. Will the proposed placemaking policy for Southbury help to adequately deliver the aspirations set out in the vision? If not, what proposed changes, omissions or additions are required in the policy to help deliver the vision?

Policy PL2, paragraph 1 requires that a holistic comprehensive masterplan be prepared and adopted as an SPD, alongside preparation of a bespoke public realm design guide/code to support delivery of the placemaking vision for Southbury. The current drafting of the policy indicates that development must be brought forward in accordance with a planned and coordinated approach for this area as set out in adopted and emerging SPDs.

Morrisons supports the principles of development in Southbury coming forward in a considered and well-planned way. However, it should be acknowledged the recent planning permission (ref: 20/00788/OUT) on the Colosseum Retail Park is particularly relevant to Morrisons' site. The emerging development context is

already well established. Further development can come forward in a coordinated and comprehensive manner without the need for an additional layer of planning policy. This could be achieved through detailed pre-application discussions and considered townscape analysis embedding principles of the Southbury placemaking vision and good growth principles.

Notwithstanding this, if the Council do proceed with preparing an SPD or Masterplan for Southbury, the wording of draft Policy PL2, paragraph 1 should be amended to ensure the absence of an adopted SPD does not preclude or delay development coming forward in the placemaking area. To address this issue we propose the following amendment to paragraph 1:

*1.) be delivered through a holistic masterplanned and comprehensive approach. The Council will prepare a spatial framework or masterplan for Southbury, to be adopted as an SPD, alongside preparation of a bespoke public realm design guide/code to support delivery of the placemaking vision for Southbury. Development in this area **should be guided by adopted or emerging SPDs, and principles established in this policy** ~~must be brought forward in accordance with~~ **to ensure** a planned and coordinated approach for this area ~~as set out in adopted and emerging SPDs.~~*

SP H1 Housing Development Sites

Morrisons supports Policy SP H1 and the inclusion of the Morrisons site (allocation reference SA10), subject to comments on capacity provided in response to Site Allocation SA10 below.

Site Allocation SA10

Morrisons supports the inclusion of the Morrisons site (allocation reference SA10). Allocation SA10 identifies the site as appropriate for mixed-used development, with an estimated capacity to deliver 892 residential homes and non-residential floorspace.

In terms of site capacity, as part of the Morrisons Call for Sites submission in December 2019, initial feasibility work was undertaken to establish the site's development potential. This work showed the site has the capacity for more residential units than currently indicated in the SA10 site allocation, that is around 1,050 units with a circa 382 Units/Ha density.

Since 2019, the surrounding context has been subject to development activity that is relevant to development on the Morrisons site. Planning permission on the Colosseum Retail Park (ref: 20/00788/OUT) was granted in July 2021. This approved up to 1,800 new homes as part of a mixed-use development with heights up to 29 storeys.

Responding to the extant consent immediately north of its site, updated feasibility work submitted as part of this representation shows that 1,050 – 1,250 units achievable on the site. The policy allocation should be revised to reflect the more detailed site specific capacity work. Making the most effective use of the site would also align with NPPF Policy (Para 125 a) which states plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible, particularly on sites which are well served by public transport. The Morrisons site is well connected to existing public transport services.

In terms of the non-residential floorspace the allocation should include a re-provided Morrisons store. It is appropriate that this retained use is made clearer in the site allocation drafting.

To address these comments, the Mixed Use Capacity Estimate should be updated to:

- **1,050 – 1,250 units** ~~892 homes~~ + non residential floor space **(including a re-provided retail store)**

DM DE6 Tall Buildings

Morrisons supports recognition in the emerging plan that Southbury is an appropriate location in principle for tall buildings. This includes the Southbury Road/ Great Cambridge Road junction along the north and west boundaries of the Morrisons site.

Figure 7.4 identifies the maximum building height allowed here to be 48 metres (circa 15 storeys). Morrisons believes that development in this location can support an increased maximum height. The recently approved scheme at the Colosseum Retail Park, immediately adjacent to the Morrisons site, has a maximum height of 126 metres (29 storeys).

Feasibility work submitted with the proposals, shows a taller building is capable of being accommodated on the site, while still responding sensitively to the surrounding townscape to the south, west and east, but also to Colosseum Retail Park height and massing to the north. Option 3 in the submitted pack shows a building of around 74 metres which sits comfortably alongside the Colosseum Retail Park scheme. However subject to further detailed design work a taller building, up to 126 metres could be possible.

An appropriate maximum height at the Southbury Road/ Great Cambridge Road junction should be higher than 48 metres as this will ensure a viable scheme that is more in keeping with recently approved schemes in the area. Policy DM DE6 and Figure 7.4 in the draft New Local Plan should be amended to reflect the emerging consented context in the Southbury area.

SP T1 Promoting Sustainable Transport

Morrisons supports the Council's vision to deliver and promote sustainable transport throughout the Borough.

The current drafting of Policy T1 states that new development is expected to be car free or offer a low level of parking provision. The Morrisons site at Southbury Road is well located for public transport, however customer parking will be needed to ensure the store is operationally viable. In relation to residential uses a completely car free development is unlikely to be commercially viable in this location, notwithstanding the public transport connections.

Concluding Remarks

We trust these representations are clear and will inform the next stage of the Local Plan process. However, should you require any further clarification please do not hesitate to contact me. We would be grateful if you could confirm receipt of these representations and also keep us informed of the timescales for next stages of the Local Plan and Southbury Forum.

Yours faithfully