



Ref:KH/EK/4444/01(06Sept21) LBoE Council

Strategic Planning and Design  
Enfield Council  
FREEPOST  
NW5036  
EN1 3BR

6 September 2021

Dear Sir/Madam,

**RESPONSE TO DRAFT ENFIELD LOCAL PLAN CONSULTATION JUNE 2021  
MORRISONS FOODSTORE, 19 ALDERMANS HILL, PALMERS GREEN, N13 4EU**

We act on behalf of our client, WM Morrison Supermarkets Plc, who own and operate the Morrisons Foodstore, 19 Aldermans Hill, Palmers Green, N13 4EU (herein referred to as 'the Site').

Our client wishes to make representations in relation to the London Borough of Enfield Council's Draft Local Plan Consultation. In particular, we wish to draw the Council's attention to the opportunity the Site presents in relation to the delivery of a mixed-use development within the Borough.

**Site Location and Context**

The Site is located at 19 Aldermans Hill, Palmers Green (see Figure 1 below) and extends to 1.3ha (3.21acres). It is bounded by Aldermans Hill to the north, railway tracks to the west, Travis Perkins facilities to its south, and its east is bounded by Bridge Drive, which separates the site from the rear elevations of retail premises fronting Green Lanes and Aldermans Hill. Palmers Green Railway Station lies to the north west of the site

Opposite the site, and occupying the northern side of Aldermans Hill, are a number of buildings with retail use on the ground floor and additional uses, including residential, occupying the further three/four storeys.

The Site includes a single storey brick building (see Figure 2 below) with associated car parking to the south. Vehicular access is provided via Bridge Drive, which runs from the south of the site and emerges at its eastern boundary. The building is currently occupied by Morrisons.



Figure 1: Site Location

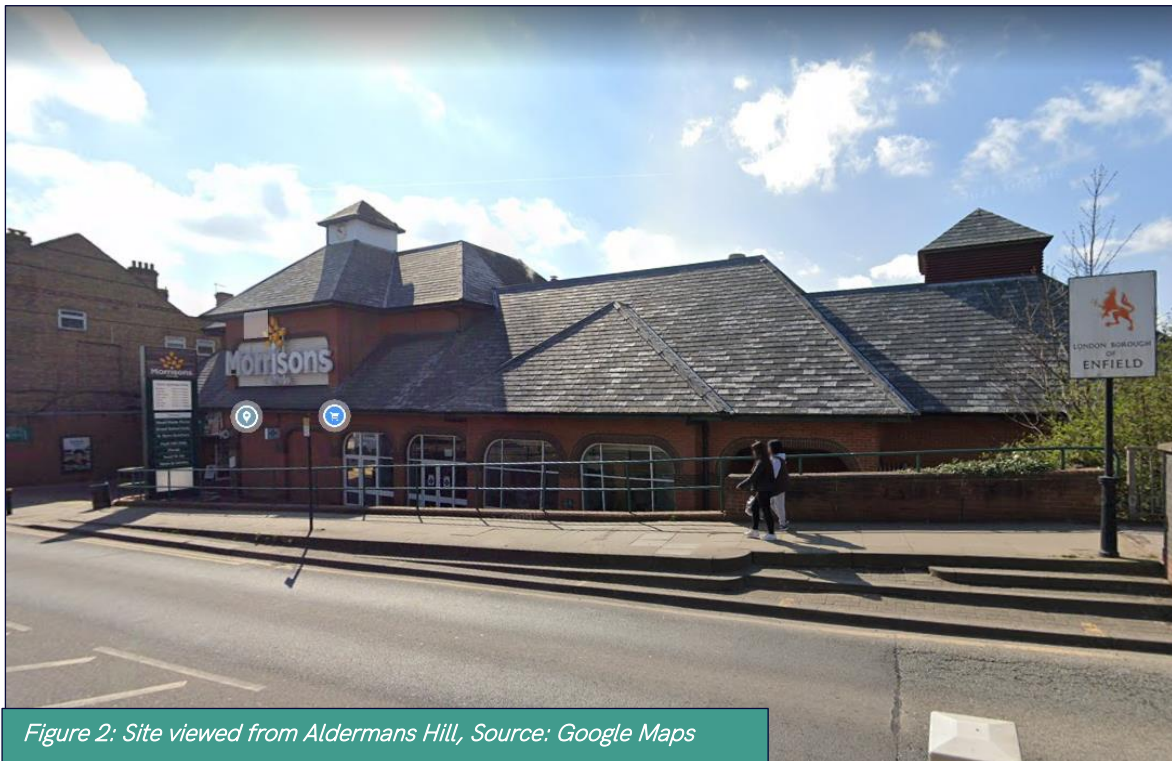
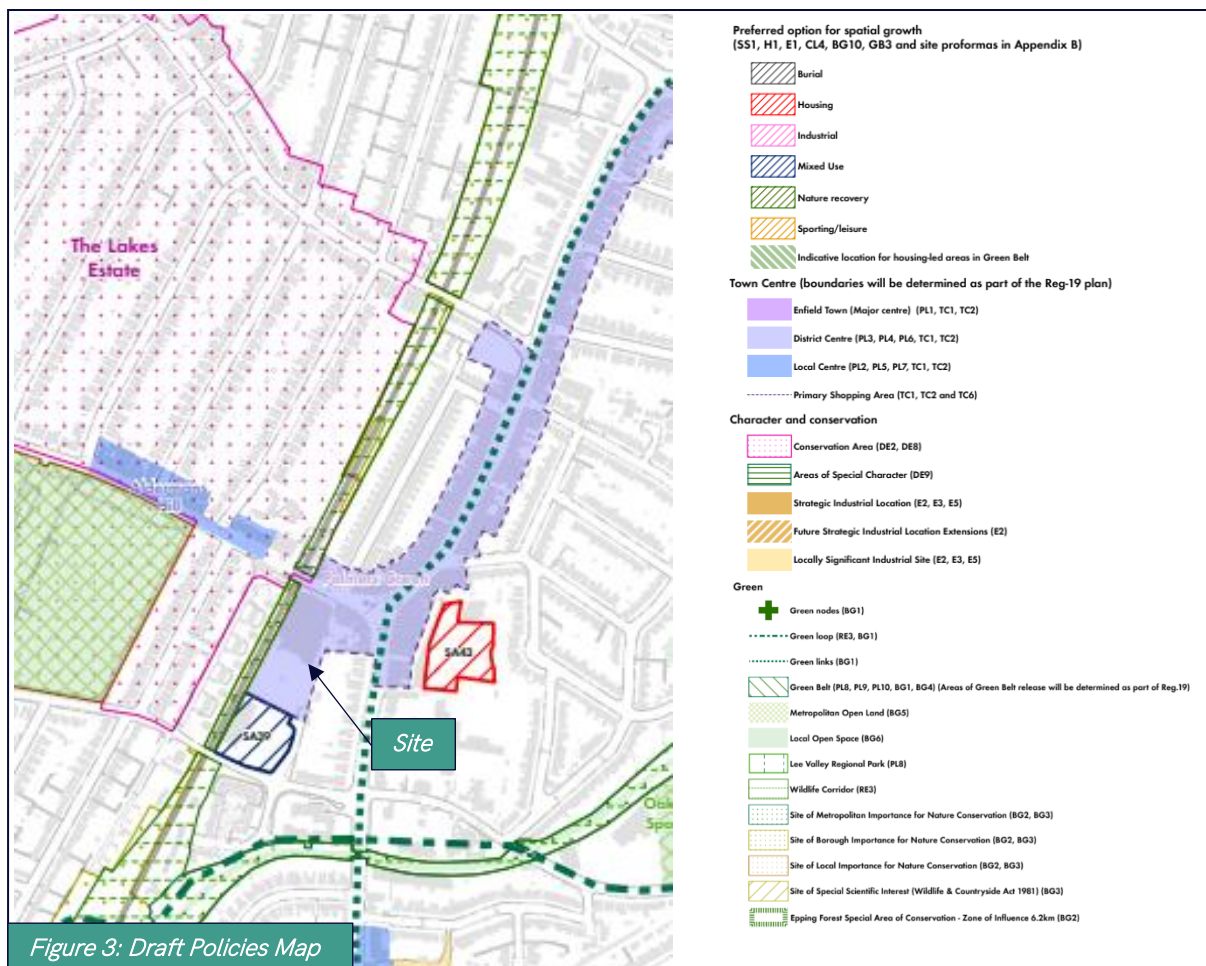


Figure 2: Site viewed from Aldermans Hill, Source: Google Maps

## Emerging Policies

Enfield Council's Draft Policies Map shows the Site is located within Palmers Green District Centre and Primary Shopping Area. The Site is located adjacent to a mixed use allocation (SA39), immediately south. A further allocation for housing is east of the site (SA43). See Figure 3.



Emerging **Strategic Policy SP TC1: Promoting town centres** of the Draft Local Plan relates to securing the long-term vitality and viability of Enfield's town centres. It sets out the measures by which this will be achieved, including by, inter alia, (a) focusing growth and investment within and around town centres; and (b) promoting a balance of residential and main town centre uses to help town centres function as multi-functional hubs, supporting the provision of facilities, services, jobs and homes.

Emerging **Strategic Policy SP TC2: Encouraging vibrant and resilient town centres** of the Draft Local Plan asserts that town centres should develop as vibrant and economically successful hubs in order to meet the needs of residents, workers and visitors. The draft policy sets out that Enfield Town and the district

centres, including Palmers Green, will accommodate a diverse range of town centre and community uses, and new residential and employment development.

Emerging **Policy DM TC6: Managing the clustering of town centre uses** of the Draft Local Plan sets out that development should contribute to the delivery of inclusive and mixed communities, including the vitality and viability of the Borough's centres. The supporting text contributes that as the Borough continues to grow and develop in the future, it is important that communities can benefit from an appropriate mix and balance of uses.

As set out above, the site falls within Palmers Green District Centre and within the Primary Shopping Area. Emerging Policies SP TC1, SP TC2 and DM TC6 each set out the emerging plan's ambition for such locations. Overall, the policies focus on securing long-term vitality within Enfield's centres through the provision of vibrant and economically successful multi-functional hubs, and by contributing to the delivery of including and mixed communities.

Peacock + Smith consider that the mixed use allocation of the site for a replacement foodstore and parking and housing would contribute towards the ambition of ensuring that Palmers Green District Centre performs as an economically successful, multifunctional hub, and meets the needs of residents, workers and visitors.

Emerging **Strategic Policy SP H1: Housing development sites** and **Strategic Policy SP E1: Employment and growth** allocates the site to the south of the Morrisons site, for mixed use development (site allocation ref. SA39, 'Travis Perkins, Palmers Green'), delivering 76 homes and at least 3,200 sqm employment floorspace, alongside a re-provided builders merchant.

Emerging **Strategic Policy SP H1: Housing development sites**, allocates the site east of the Site for housing development (site allocation ref. SA43, 'Lodge Drive Car Park, Palmers Green'), delivering approximately 50 new homes.

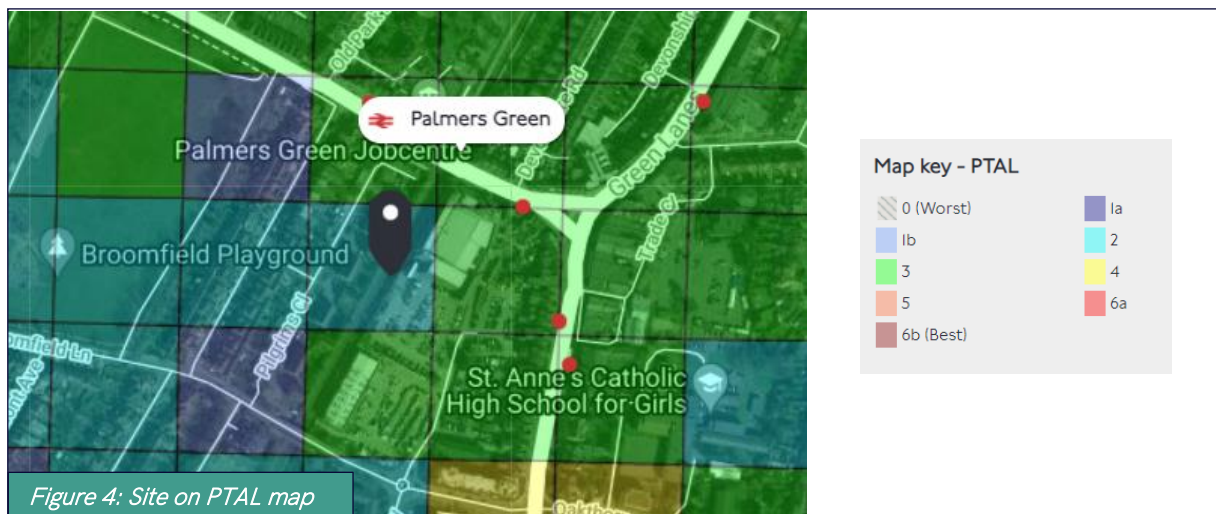
As set out, 'Travis Perkins, Palmers Green' is allocated within the emerging plan for mixed use development, with the potential for delivering 76 homes and at least 3,200 sqm employment floorspace, alongside a re-provided builders merchant. The emerging local plan asserts that its estimated capacity is 3,209 sqm, with a total site area of 0.62ha.

Peacock + Smith assert that the Site's total area is circa 1.3ha, and on the basis of the aforementioned allocation ref. SA39, have deduced that if allocated for mixed use development, it would be capable of

providing circa 6,000 sqm retail floorspace, and up to 190 homes, and car parking, within a development of comparable scale to that set out within the allocation ref. SA39.

Moreover, in a similar vein to site allocation ref. SA39, the Morrisons site is within Flood Zone 1, and is therefore in an area with a low probability of flooding (we note the site is situated a significant distance (circa 300m) from Flood Zone 2). However, we note that some parts of the site are at risk from surface water flooding.

Furthermore, the site is situated predominantly in an area with a PTAL rating of 3, including the front section of the site. A small proportion, situated to the rear of the site, is located within an area with a PTAL rating of 2, as can be seen in Figure 4 below. However, a number of public transport facilities, including Palmers Green Rail Station, and a number of bus stops are readily accessible from all parts of the site.



It is acknowledged that the site is in close proximity to the Lakes Estate Conservation Area (please refer to Figure 3). However, Peacock + Smith consider that the physical separation provided by the stretch of railway line (between Palmers Green and Bowes Park Railway Stations), and the dwellings located on Pilgrims Close, render the heritage impacts of development on the site negligible, if at all. This is supported by allocated ref. SA39, which sets out that heritage impacts are 'none'. The Morrisons site and Travis Perkins site are equidistant from the Conservation Area.

Neither the emerging policies map, or the adopted policies map, indicate any further constraints on the Site which suggest that its allocation for mixed use development would not be appropriate.

We consider that our client's site should be included as an additional site allocation for mixed use development to provide a replacement foodstore (with parking) and housing. The Site has the potential to deliver a significant quantum of housing that would contribute to the Borough's ambitious housing delivery targets.

### **Call for Sites Form**

We acknowledge that no representation was submitted to Enfield Council with regard to the Site during the Council's previous 'Call for Sites' consultation. As such, we have completed the Council's proforma and attached this at **Appendix 1** for the Council's consideration.

### **Conclusion**

The Site presents an ideal opportunity to deliver a mixed-use development for a replacement foodstore, car park, and housing, contributing to the Council's ambitious housing delivery targets, whilst still providing a ground floor retail use to serve existing and future residents, as well as providing ongoing employment opportunities. As such, we believe the Site should be allocated for mixed-use development.

We thank you for the opportunity to submit comments in relation to Enfield Council's draft Local Plan. Should you have any questions in relation to the contents of this submission, please contact

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Yours Sincerely,

# Appendix 1

Call for Sites Form

## Call for sites submission form

As part of the plan making process the Council is undertaking a 'Call for Sites.' We are inviting anyone with an interest in land, potential sites and broad locations for development to submit these to us for consideration. We have an identified need to provide an additional 50ha of land for industry and logistics over the plan period – we're therefore especially keen to hear about sites which have potential to accommodate employment activities. We would also welcome the submission of sites suitable for office uses in town centres. The Publication London Plan also identifies a need for us to deliver 1,246 homes per year so we also want proposals to come forward for small and medium sites for housing particularly in the built-up areas of Enfield.

For such brownfield sites the Council not only wants to be able to identify the land or buildings themselves, we also want to be able to understand the schemes that are being proposed. This will help us to assess the capacity and deliverability of such sites, and whether they are available, suitable and viable. These sites will then be assessed and if deliverable will be consulted upon in the next stage of the Local Plan.

Please complete a submission form for each individual site you are submitting and include a site location plan (preferably an OS Map), clearly showing the boundaries of the site outlined in red (or otherwise clearly marked). The map should show at least two named roads, to ensure that the site can be correctly identified. A postcode would also help to locate the site, even where this relates to adjacent land or buildings.

Sites proposed for residential should be capable of delivering five or more residential dwellings and/or should be at least 0.05 hectares in size. Sites proposed for employment should be capable of delivering 500sqm or more employment floorspace and/or should be at least 0.25ha in size.

We have previously undertaken several Call for Sites exercises. If you have previously submitted your site, and there is no material change to your last submission, we do not require anything further from you. However, if you have new sites to submit, or would like to provide updated information please complete this form.

**Please provide your responses by no later than Friday 26 February 2021.** Responses after this date will be accepted on an ongoing rolling basis. However, where sites are received after work on a HELAA update has already commenced the Council will include sites within the next HELAA update unless there are exceptional circumstances.

Representations cannot be made anonymously, so please provide your full name and contact details. Please note that representations will be made publicly available, along with your name. Please complete a separate form for each site submitted. To make your submission please fill in this form and return by email to: [localplan@enfield.gov.uk](mailto:localplan@enfield.gov.uk) quoting 'Call for sites' in the subject field.

If you do not have internet access, please contact us via telephone on 020 8379 3866

Thank you



## Enfield's draft new Local Plan

### Call for Sites Submission Form

Contact details			
<b>Name:</b>	Ben Kallend		
<b>Organisation:</b>	WM Morrison Supermarkets Plc		
<b>Address:</b>	19 Aldermans Hill, Palmers Green		
<b>Postcode:</b>	N13 4EU		
<b>Telephone:</b>	07964 132 411		
<b>Email:</b>			
<b>Your interest in the site:</b>	I am a...	Developer	
		Freeholder	
		Leaseholder	
		Resident	
		Potential purchaser	
		Community group	
		Planning consultant	
		Registered social landlord	
		Other (please specify)	Landowner

<b>Site details</b>			
<b>Site address (or location)</b>	19 Aldermans Hill, Palmers Green London, N13 4EU		
<b>Site area in hectares or square metres</b>			
<b>Site location plan submitted?</b>	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
<b>Current or most recent use of the site</b>	Foodstore and associated car park		

Ownership of the site				
<b>Please provide details of landownership/land interests if known</b>	Site owned by WM Morrison Supermarkets Plc			
<b>Are all the above owners/those with a land interest aware of this submission of the site?</b>	Yes		No	If 'No' please give reasons

<b>Proposed development</b>		
<b>What type of development is proposed? Please provide further details of the type of residential / employment / cultural / retail or mixture of uses proposed.</b>	Residential	Residential above foodstore
	Employment / Industrial	
	Retail / commercial	Retention or replacement of existing foodstore
	Office	
	Arts and culture	
	A mixture of types	
	Other (please specify)	
<b>Please tell us more about the proposed type of development...</b>		
<b>What is the potential capacity of the site? (Please provide approximate dwelling numbers and densities or approximate floorspace for employment / office development)</b>	Up to 190 dwellings dependant on unit typology	

Site details			
Does the site have direct access to the existing highway network?	Yes	Further comment: Access via Bridge Drive	
	No		
What access is there in terms of public transport?	Bus stop	Y	Distance in Km: Palmers Green bus stop D approximately 20m away Distance in Km: Palmers Green Railway Station approximately 30m away
	Railway / tube station	Y	
Are there any known constraints to the site? (access difficulties, ground conditions, contamination, flood risk, legal issues or any others)	Areas of the site are prone to surface water flooding according to the Government's flood risk mapping. See attached Map.		
Are there any known environmental constraints on, or in close proximity to the site? (i.e. Green Belt, Metropolitan Open Land, Biodiversity)	N/A		
Has any work been done on the promotion of the site? (e.g. legal reports, traffic surveys, ecology reports etc)	N/A		
Are any of the following services available on or to the site?	Water	Yes	No
	Electricity	Yes	No
	Gas	Yes	No
	Foul sewer	Yes	No
	Surface water sewer	Yes	No

	Broadband	Yes	No
<b>Does the proposed site require amendments to existing services?</b>	Water	Yes	No
	Electricity	Yes	No
	Gas	Yes	No
	Foul sewer	Yes	No
	Surface water sewer	Yes	No
	Broadband	Yes	No

<b>Delivery and timing</b>	
<b>Broadly, when do you think that the site could become available for the commencement of development?</b>	0-5 years
	6-10 years
	11-15 years
	15 years or more

### Any other relevant information

Please provide any other relevant information below:

None at this stage.

### Future updates

Please tick this box if you wish to be added to our contact list and be updated about future progress on the Local Plan and other planning policy updates.

Y

[< Back](#)

# Learn more about this area's flood risk

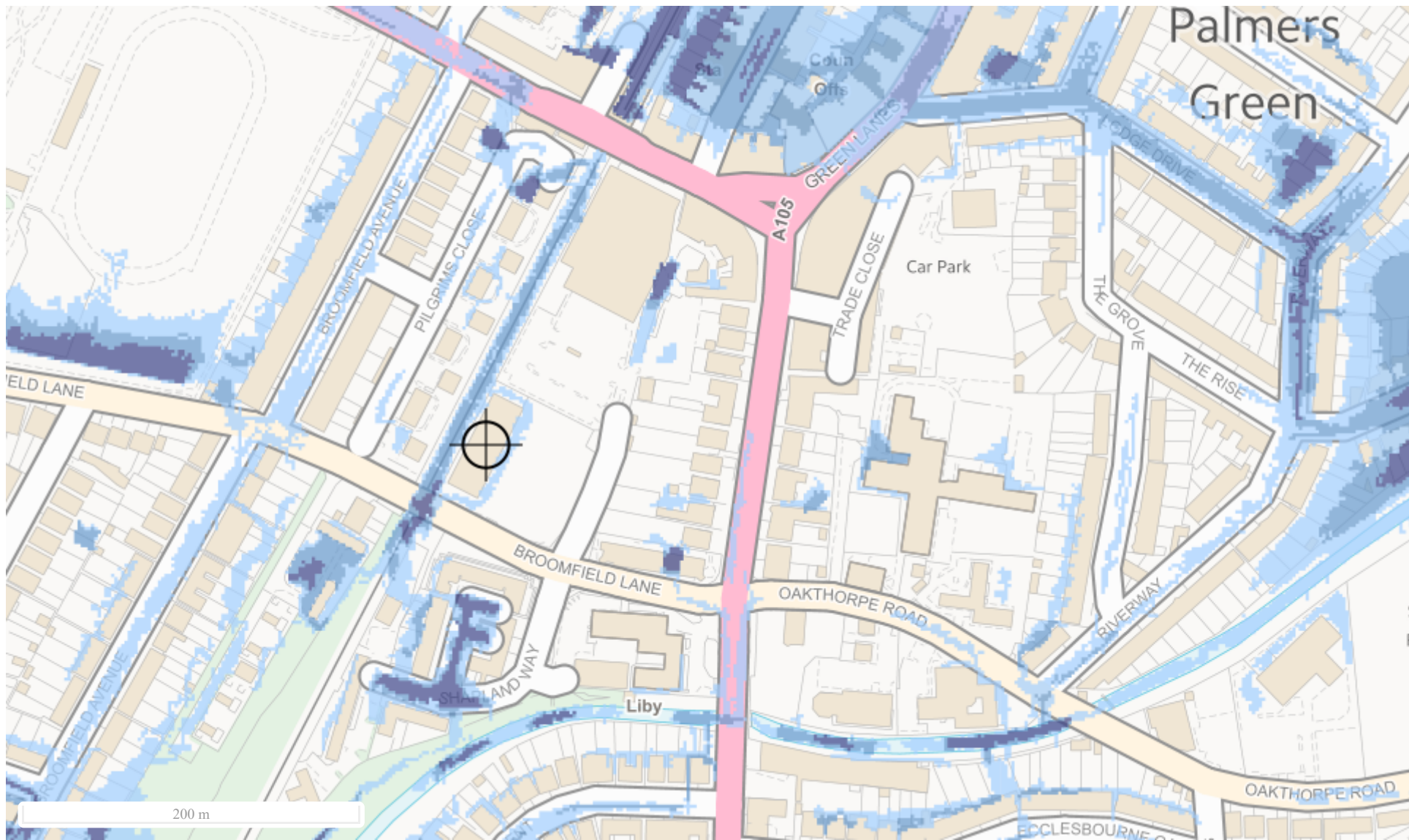
Select the type of flood risk information you're interested in. The map will then update.

Flood risk

Location





Extent of flooding from surface water

[High](#)

[Medium](#)

[Low](#)



[Very low](#)

Location you selected

[View the flood risk information for the location you originally searched for \(/long-term-flood-risk/risk\)](/long-term-flood-risk/risk)

[View the flood risk information for another location \(/long-term-flood-risk/postcode\)](/long-term-flood-risk/postcode)

This information meets the requirements of the EU Floods Directive 2007/60/EC