



The Enfield Society

conserving our heritage and environment

Enfield Local Plan Examination

Matter 5: Key Diagram, Spatial Strategy and methodology for selecting site allocations

This hearing statement relates to the following 'duly made' representations at [01794-1-1](#) (hyperlink)

Please see Enfield RoadWatch's responses to Q5.1, Q5.2 and Q5.10.

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

No.

Whilst a Whole Plan Viability exercise has been carried out, we pointed to a number of weaknesses around abnormal costs at Crews Hill in particular regarding the provision of new bridges over the railway, but also regarding the lack of accounting for the 'rural Enfield' costs in Policy BG7. Furthermore, there appears to be no allowance made for major infrastructure costs such as schools and highways measures.

Given the special viability considerations with Palace Gardens that go well beyond what could be addresses by whole plan viability, the proposal to defer serious consideration of viability at Palace Gardens is of real concern. That is likely to result in site-level viability appraisal produced at application stage to justify much higher buildings than the 27m set out in the SA1.1, resulting in substantial harm to the Enfield Town Conservation area and a number of heritage assets. Deutsche Bank (the leaseholder) has chosen not to participate in the Examination and therefore is unable to answer questions regarding public statements that it made during pre-application public consultation around the lack of viability of anything less than 26 storeys (81m).

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

As set out on p10 of our representations, the inclusion of Enfield Town within part 7 of this list is not justified or consistent with national policy in respect of the historic environment because it legitimises tall buildings, including at Palace shopping centre, of a height that could cause substantial harm to a number of heritage assets and the Conservation Area as a whole. For that reason, we commissioned heritage experts Archaeology South-East to undertake a Heritage Impact Assessment (see Q5.24 below) which we would like to submit for consideration during Stage 2 of the examination and which is necessary in the context of NPPF paragraph 206.

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

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

The key diagram shows a much larger extent of Green Belt release at the railway line west of Crews Hill than is proposed for development in the Plan. This is further confused by the blue dashed ellipse, which implies ambiguity around the extent of future development, potentially taking development deep into areas of open countryside in area SA11.2. This is the area owned by the Council and which many observers believe is a major driver of the spatial strategy.

A second inaccuracy is that the key diagram fails to identify the fact that Meridian Water East Bank/Harbet Road is identified in the Plan as a future area for new industry and logistics, as set out in our Hearing Statement for Matter 3.

Finally, the key diagram shows intensification around all railway stations, which implies tall buildings. That does not form part of strategy and is not justified. It would have negative implications for the character of the borough.

Q5.18 Is the relationships between the concept of ‘gentle densification’ and areas identified for ‘intensification around transport nodes and town centres’? Are these two policy approaches compatible?

The key diagram shows *‘intensification around transport nodes and town centres’* around all stations, irrespective of the constraints and indeed whether or not there are any suitable sites. See our representations regarding Enfield Chase station (DE6 area 2.4) (p47 of our representations) and Palmers Green (Morrisons at Aldermans Hill, p21 of our representations), which raise issues of the impact of tall buildings on residential amenity and character as well as the impact on Broomfield Park Registered Historic Park. A number of proposals for tall buildings, which would be damaging to heritage assets and the character of local areas, are proposed within the Local Plan. A number of the ‘transport nodes’ shown, such as Grange Park and Gordon Hill, where there are no obvious sites for development of any kind. Furthermore, Grange Park, Bush Hill Park, and Southgate are all constrained by Conservation Areas.

Clearly there is a conflict between the proposals for ‘gentle densification’ in these areas, and proposals for intensification (which implies tall buildings and are clearly neither suitable nor deliverable in a number of cases).

5.22 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?

Table 3 on p32 ([ref TOP2](#)), showing the priorities, is shown below.

Table 3: Prioritisation of sites by category

Priority	Broad Site location	Site typology	Approach to Allocation
1	Sites within the urban area	Brownfield sites in urban area	Allocation, subject to other stages
2		Greenfield sites in urban area	Allocation, subject to other stages
3	Accessible Green Belt sites	Brownfield sites in accessible ²⁸ Green Belt location	Potential allocation possible, subject to alignment with emerging spatial strategy
4		Greenfield sites in accessible, lower performing Green Belt location	Potential allocation less likely, unless exceptional circumstances
5		Greenfield in accessible, moderately performing Green Belt location	Potential allocation less likely, unless exceptional circumstances

²⁸ Accessibility will be determined by the Public Transport Accessibility Level (PTAL) of sites

6		Greenfield in accessible, high performing Green Belt location	Potential allocation less likely, unless exceptional circumstances
7	Isolated Green Belt Sites	Brownfield in isolated Green Belt location	No allocation unless exceptional circumstances
8		Greenfield in isolated low or moderately performing Green Belt location	No allocation unless exceptional circumstances

According to the logic set out in Table 3, the sites at Chase Park and land East of Junction 24 and much of Crews Hill, would fall within the site typology “*isolated, high performing Green Belt*” (as demonstrated by the LUC Green Belt study document library GRE), which is excluded from the site selection process. Allocation of isolated, high performing Green Belt sites is not an approach envisaged by the Topic Paper methodology.

“Isolation” is a relative word, but in this context the meaning is unambiguously established by the London Plan. From this it is clear that most of Chase Park has a PTAL of 0 or 1a (worst in London), as does Land East of Junction 24 and most of

Crews Hill. In the context of the London Plan, which seeks to achieve 80% of journeys by non-car modes, these sites are all unequivocally “isolated”¹.

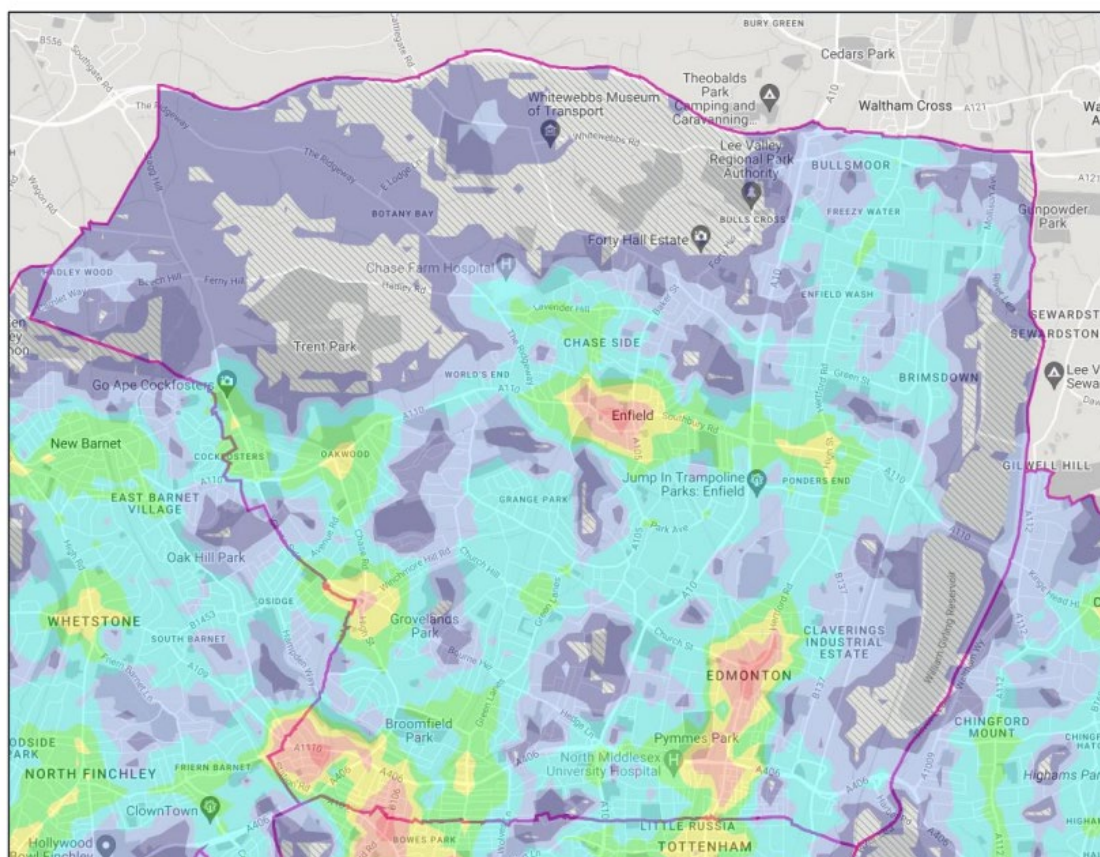


Figure 3-5 - PTAL, London Borough of Enfield (source: WebCAT)

The Site Selection Topic Paper is silent² as to the basis on which the “exceptions” referred to in the last column of Table 3 are justified. Therefore, the overall conclusion must be that the Topic Paper fails to justify the allocation of isolated, high performing Green Belt sites.

¹ See representations submitted by Transport for London at Regulation 18 and Regulation 19 stages.

² The ‘exceptional circumstances’ argument is addressed in our *Hearing Statement for Matter 4: Green Belt*

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

Please see the representations submitted by Enfield RoadWatch regarding questions 5.20 and 5.23

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?

No. The explanation on page 17 of the topic paper (paragraph 5.23 states) states that these matters were reviewed by relevant Council officers. The private nature of this process inspires no confidence that the views of specialist heritage officers were not overruled when other interests were at play. We submitted an example of this at the locally listed site at Arnold House (our reps on SA10.2) when the views of heritage officers appear to have been set aside as an attempt was made to establish the link road through to the main Chase Park site, without any explanation in the covering report to members.

Furthermore, the plan on p17 does not show the intersection with the designated Area of Special Character shown on the current Policies Map and protected by policies DMD84 and Core Policies 30, 31, and 33. The ASC is described in paragraph 8.4.1 of the Core Strategy as an “*important historical landscape*”.

Particularly given the issues that we and other groups have raised regarding the political and financial factors³ affecting the care and attention that might be given to matters relating to heritage and character of the west of the borough, a proportionate approach to the evidence in this case requires more attention than might otherwise be the case. We have particular concerns that so many proposed allocations policies defer matters such as Heritage Impact Assessments to the planning application stage, when there are matters of principle that a Local Plan ‘green light’ would render

Furthermore, as we noted in Matter 1, because the Council has retrospectively published comments since submission of the Plan for examination, it appears that none of these issues were taken into account as part of the site selection process, but were only part of retrospective justifications, contrary to PPG⁴.

Failure to apply landscape evidence

We pointed out in 2021 that the Council had failed to publish or refer to the *Enfield Characterisation Study* (2011) as the major source of landscape and character information. We cited numerous parts of that document as evidence of the harms that development would cause. Whilst the Council subsequently submitted that Study as part of the evidence base (reference [DES42](#) and [DES43](#)), we still cannot find any

³ Hearing Statement Matter 1

⁴ [Paragraph: 038 Reference ID: 61-038-20190315](#)

references to how the findings of that evidence were taken into account during the critical plan preparation stage. The Character of Growth Study deals with the urban areas only and does not draw on or explore the implications of the findings around landscape character. We can find no reference to how the implications of the Landscape Sensitivity Appraisal [PLA13](#) were addressed.

The *Crews Hill and Chase Park Landscape Sensitivity Appraisal* ([PLA13](#)) were published in 2023, i.e. after the decisions were taken regarding the allocation of sites in 2020-21, and the implications of the findings for the allocations are not spelled out in any of the documents. This confirms our view that the evidence-gathering was simply part of a tick-box approach to compliance, rather than a genuine attempt to take these important matters into account.

Furthermore, our own landscape appraisal by EnPlan questions a number of points in the assessment, not least the failure to take account of the appearance of 6-storey buildings at the garden centres from the Ridgeway across the top of the trees, as well as the cumulative impact of the development across much of the remaining landscape.

Transport - Impacts on the character of rural lanes

We submitted a map showing that Enfield Chase preserves the last parts of rural Middlesex, and explained that the rural lanes are a critical part of that character ([01794-1-1](#) second paragraph on p3, PL11 p39, and also in terms of a possible access from Chase Park to Hadley Road p33 para 5). This was further to similar observations in our Regulation 18 representations. The Infrastructure Delivery Plan includes a number of vague highways interventions. The scale and visual impacts of these interventions is unclear and (in addition to the large volume of traffic) they could have serious adverse effects on the character of those lanes, and on the Conservation Areas including at Forty Hill and Clay Hill as well as important areas such as Botany Bay. We can find no evidence that these impacts were taken into account.

Missing evidence – the Enfield Town Centre Framework Masterplan (2018)

Unlike the other evidence base documents, this document was produced with input from local stakeholders⁵, plans which appeared in the 2018 *Issues and Options* Local Plan document (document library reference ISO1, p 130), and which *The Enfield Society* referenced in our Regulation 18 representations in 2018. Despite all this, the document was not submitted as part of the evidence base, and we can find no explanation of how the implications of this study regarding the Palace shopping centre were taken into account. This has implications for the issue of tall buildings within Enfield Town Centre that have therefore not been made available as part of the Examination in Public.

Missing evidence regarding heritage

There is a signed Statement of Common Ground with Historic England stating that there is no need for further evidence beyond that already assembled.

⁵ However it does remain on the Council's website [here](#)

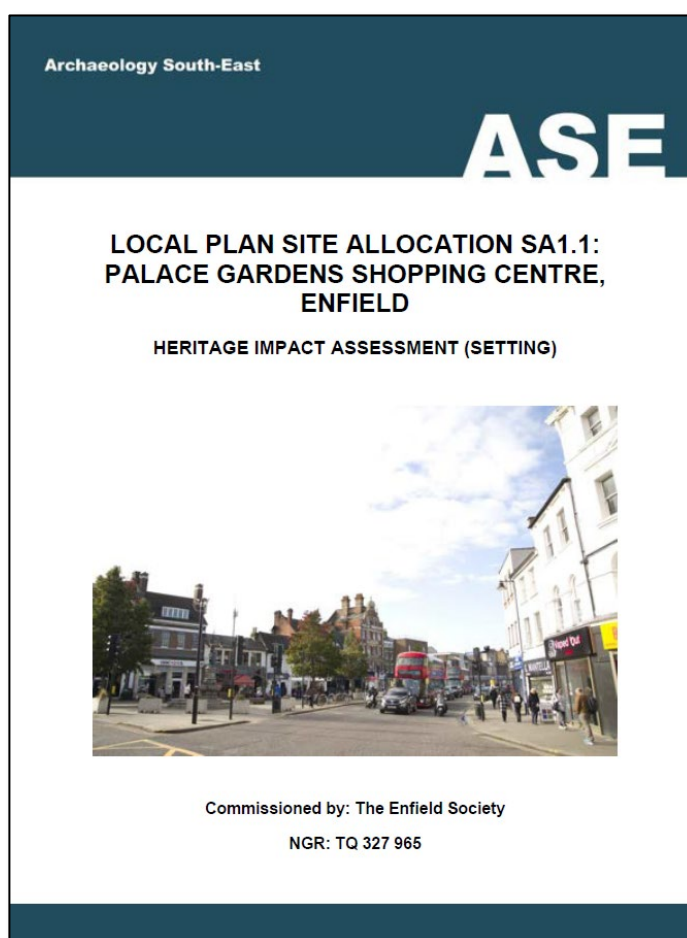
However, the limitations of a resource-constrained body such as Historic England are evident in their failure to follow their own [Advice Note 3: The Historic Environment and Site Allocations in Local Plans](#) (2015). This identifies a staged approach to identifying significance and then consideration of impacts work should have been undertaken at Stage 1, followed by assessment of significance and then consideration of the impacts. The work presented does not follow this guidance.

For those reasons the Enfield Society followed the Historic England Advice Note in commissioning experts **Archaeology South-East to undertake a Heritage Impact Assessment (HIA) (Setting) at Crews Hill**, which identified that in two cases there would be substantial impacts to the setting of listed assets from the proposed development at Crews Hill. However this was not taken into account in the selection of those sites for allocation.

In order to ensure compliance with NPPF paragraph 206 (and best practice set out in Historic England Advice Note 4)⁶, *The Enfield Society* has filled that gap through a commission to experts ASE (see cover, right) to undertake a **Heritage Impact Assessment for the proposed tall buildings at Palace Gardens**.

We would like this study to be considered at an appropriate time during Stage 2 of the Examination process in order to apply the findings of the *Character of Growth Study* in a matter consistent with national policy and guidance.

This is particularly important given the Council's financial interests in the site and the differences in the scenarios modelled in the *Character of Growth* study.




⁶ [Historic England Advice Note 4: Tall Buildings \(2022\)](#)

Impact on Enfield Chase

The Council failed to follow up on important issues raised by Historic England related to the impact of development at Chase Park on the structure and coherence of Enfield Chase, which they stated is “*rare in a national context*” in their Regulation 18 consultation response in September 2021. Historic England did not pursue this in their Regulation 19 representations, but the issues raised are clearly informed by expert opinion and remain relevant.

Extracts from HE’s representation are provided below (yellow highlights added by us), and the full representation can be viewed by clicking on this link (REG3 representation ID 2071):

<https://www.enfield.gov.uk/file/PDFs/email-reps/2071%20Historic%20England.pdf> :



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effects on the historic environment. We also note the relevant sections of the evidence base produced to date in relation to the borough’s heritage.

Nevertheless, we would stress that we consider there remains further work to be done in the Plan’s preparation to ensure it provides a positive strategy for the historic environment and indeed that it conforms with national and regional policy in this respect. While we note the logic as set out in relation to strategic policies for the various places across the borough (and the site allocations within these places), we are concerned that **there has not been adequate assessment of the potential effects on the significance of important designated heritage assets before the principle of the development specified at these locations is established. This concern relates to allocations both in the green belt and within urban and town centre locations.**

Perhaps the most important example of the shortcomings of this approach within the Plan relate to the proposed development at Chase Park. A number (although not all) of the **heritage assets likely to be affected have been identified and referenced both within policy PL10 and the site allocation pro forma. However, it is unclear whether any analysis of these assets and their settings have played a part in determining whether the site is appropriate for such large scale development given the potential effects on their significance, or whether such analysis has been taken into account in determining the indicative capacity. We further note the absence of explicit reference to the historic environment within policy PL10.**



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and benefit from such proximity, any development such help enable increased maintenance and enhancement of Trent Park and its features. With that in mind, there is no existing Conservation Management Plan in relation to the wider Trent Park RPG, and such a document would identify and prioritise projects, such as restoration of the lakes, improvements to woodland and grassland areas, restoration of the Cascade, restoration of the Japanese garden, enhanced facilities, etc.

However, a more complicated issue is that of setting. Chase Park will overlay and 'fill in' a large part of the historic extents of Enfield Chase. Indeed, Trent Park was created when Enfield Chase was carved up and disafforested in the 18th century, so the surrounding open countryside to south east, east, north and north west form part of its wider setting and contribute to its significance by helping us understand its development. The same is true for the Camlet Moat scheduled monument, which occupied an important position within Enfield Chase.

Enfield Chase's survival as open countryside with recognisable features associated with its former legal status and management under Forest Law is rare in a national context, and as

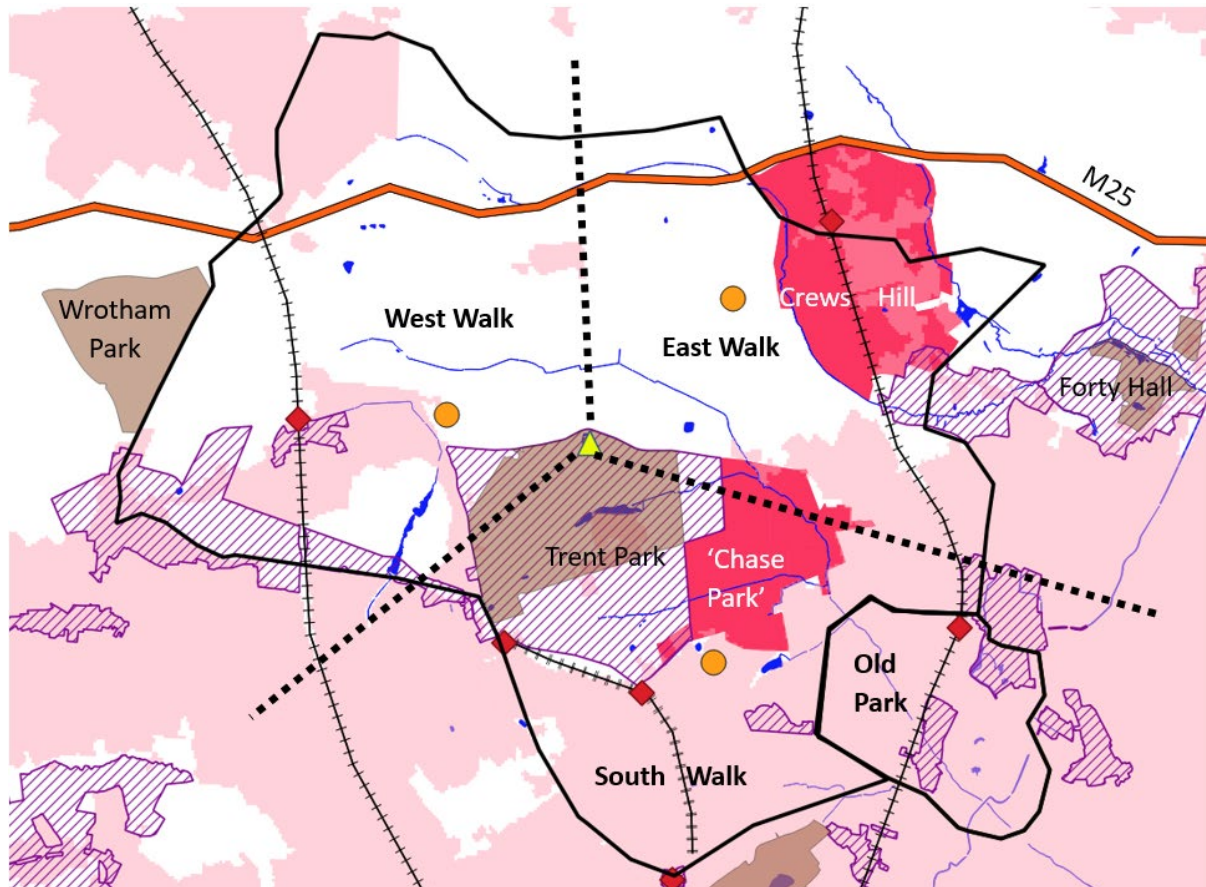






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such requires careful consideration within the context of the draft Plan. While using an understanding of heritage significance to help determine design parameters and capacities (and indeed whether they are appropriate locations for development) is required for a number of site allocations within the Plan, it is particularly true of Chase Park.

The Enfield Society commissioned ACTA historic landscapes expert to produce the *Enfield Chase Statement of Heritage Significance (01794-5-1)*, which confirms Historic England’s points about rarity and importance in a national context, as well as explaining the issues of structure in the understanding the development of the chase as comprising three historic administrative ‘walks’ of which as noted by Historic England the Chase Park development would result in the loss of the south walk and a loss of the overall structure of the Chase as shown below.

Structure of the Chase



-  Enfield Chase boundary in 1777
-  Walks (conjectured boundaries)
-  Local Plan 'Rural Placemaking Areas'
-  Camlet Moat
-  Historic Lodges (site of)
-  Registered Historic Parks
-  Conservation Areas
-  Surface water
-  railway stations
-  Built Up Areas 2024



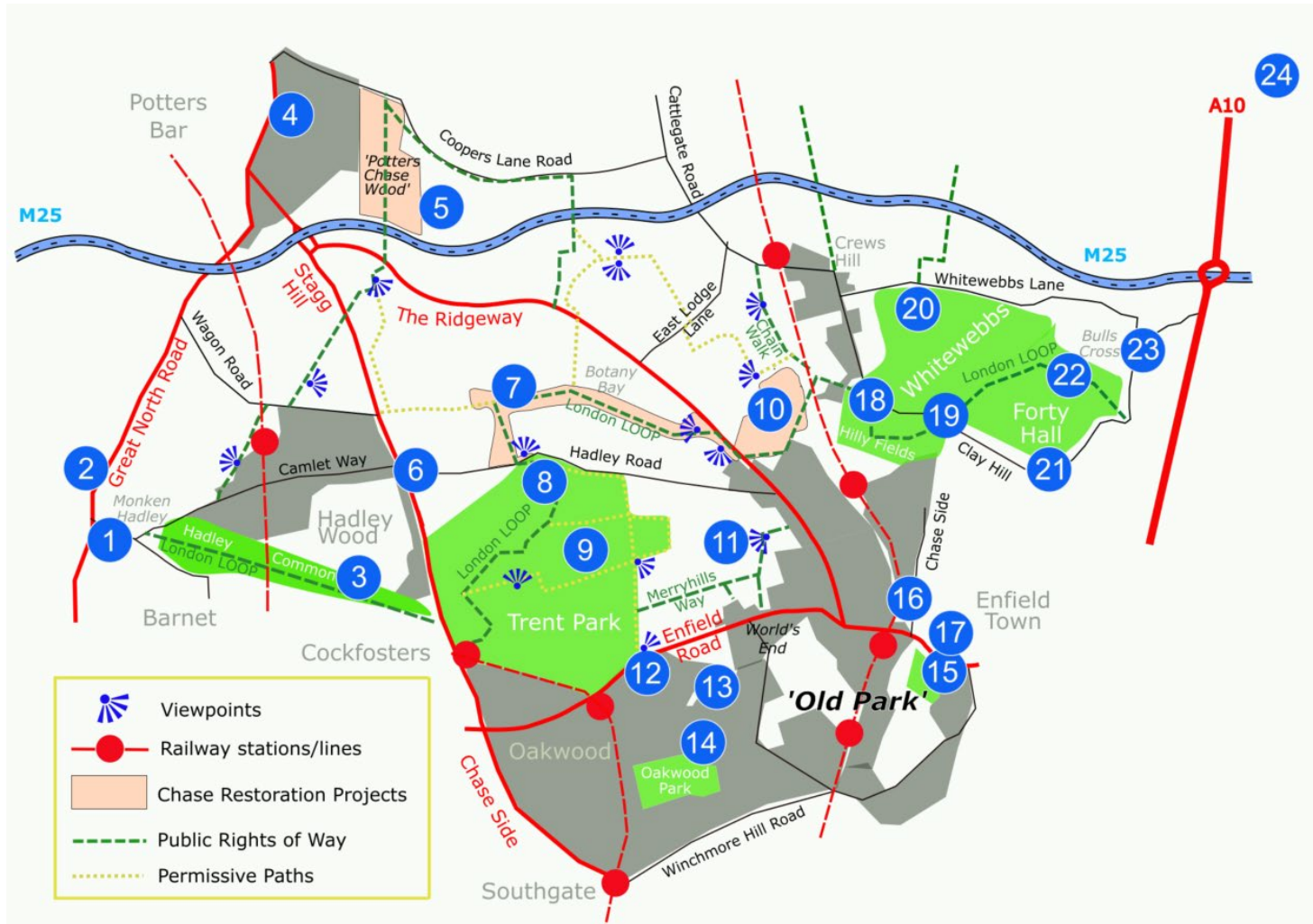
View South-East from Trent Park
across Enfield Chase towards Enfield
(spire of St Marys Church) across the
threatened landscape at 'Chase Park'

The Statement of Common Ground signed by Historic England does not address their earlier concerns: it simply shows that it is not willing to pursue these matters any further. This does not make the issues they raised in 2021 any less pressing matters for this examination, which has to be evidence-led. In the absence of Historic England, the heritage and conservation role of The Enfield Society must be properly recognised.

The contribution of Enfield Chase to the character and identity of the area

In 2021 we submitted a copy of David Pam's book *The Story of Enfield Chase* (1986) alongside the Council's own *Boundary Review of the Area of Special Character* (resubmitted in 2024 here: [01794-9-1](#), and *A History of Enfield Chase* (2022) (resubmitted in 2014 here: [01794-3-1](#)), which all illustrate the role of Enfield Chase in the identity of the local area. It is clear from studying many of the individual representations that this feeling is widely shared. Furthermore, we submitted expert evidence from landscape professionals (here: [01794-12-1](#) and here: [01794-13-1](#)) complemented by expert heritage impact from a heritage consultant ([here: 01794-5-1](#)) that Enfield Chase forms a **valued landscape**. The Council's responses in SUB12.1 mention this but do not directly respond to it (see for example SS1 p159 and SA11.2 p417 appear to be a copy and paste of the non-response to RUR.04 p474).

Furthermore, we submitted in 2021 our survey of users of the Merryhills Way, and in 2024 we resubmitted it with a map of rights of way and walks leaflet to emphasize that this is a valued landscape.



The *Enfield Chase Statement of Significance* includes historic mapping showing the Chase boundaries transposed onto modern mapping.

A History Of Enfield Chase (ref 01794-3-1) also shows how this relates to 'Places to Visit' today – this forms a critical part of a coherent identity of the historic Chase, currently protected by the *Area of Special Character* (policy DMD84) and is the main determinant of the character of the area.

By contrast the submitted Local Plan emasculates the ASC (see our reps on DE11) and places it only in relation to Crews Hill.

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

Q2.30 [5.30]. Is the Plan clear as to when masterplans or planning briefs must be prepared and the mechanism by which they could be approved.

Please refer to the response submitted by Enfield RoadWatch.

WORD COUNT: 2940 WORDS INCLUDING QUESTIONS