



Our ref: PL00518203

Strategic Planning & Design
London Borough of Enfield
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By email: localplan@enfield.gov.uk

13 September 2021

Dear Sir/Madam

London Borough of Enfield – Regulation 18 Consultation on draft Local Plan

Thank you for the opportunity to comment on the above consultation document. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process.

Our comments are made in the context of the principles relating to the historic environment and local plans within the National Planning Policy Framework (NPPF) and the accompanying Planning Practice Guide (PPG). They focus in particular on whether the draft Plan makes sufficient provision for the conservation and enhancement of the historic environment in Enfield through strategic policies (NPPF, para 20), whether the identified evidence base for the historic environment is relevant and up to date (para 31) and if the Plan sets out a positive strategy for its conservation and enjoyment (para 190). They also consider whether the policies set out in the Plan are clearly written and unambiguous (para 16b).

Summary

We note the scale of growth that the Borough has to address over the coming years, and acknowledge that this is likely to pose difficult challenges in accommodating such development while avoiding adverse impacts on Enfield's environment and historic character. We consider therefore that there is much to welcome in the plan in terms of strategic and non-strategic policies and the approach they set out to managing change with



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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.

As such, we consider there is a risk that the approach set out in section 3 (Places) and the constituent site allocations undermines the strategic approach set out elsewhere in the Plan to the historic environment. Strategic policies DE1 and DE4 in particular are to be welcomed and in themselves clearly seek to achieve contextually aware new development that would integrate with the existing built and historic environment of the borough.

However as set out, we consider that a number of site allocation policies will conflict with overarching aims to conserve and enhance the historic environment. Without adequate consideration and identification of potential heritage issues at the plan-making stage, there is also the possibility that such site allocation policies will not provide for conservation and enhancement of the historic environment (NPPF para 20), not be based on up to date and relevant evidence (para 31) and may contain unacceptable ambiguity (para 16b). We strongly suggest undertaking a significance-based approach to site allocations, as set out in our



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guidance on this subject: [The Historic Environment and Site Allocations in Local Plans \(historicengland.org.uk\)](https://www.historicengland.org.uk). This comment applies to all site allocations bar SA30, 34, 35 and 40 although please see our comments on the Places section of the Plan and further comments on certain site allocations below.

Further detailed comments on this and other areas of the Plan are set out below. We would be keen to continue discussions on these subjects as the Plan evolves in order to ensure appropriate consideration of these issues, and that the emerging plan meets the requirements of the NPPF in respect of the historic environment.

I trust these comments are helpful. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.

In the meantime, please do not hesitate to contact me should you require any further information.

Yours faithfully

Appendix 1

Overarching comments

As noted above, we welcome the various references to heritage and local character throughout the document and consider these to be helpful in terms of contributing to a positive strategy for the historic environment. In particular, strategic policies DE1 and DE4 are clear that context and existing character are critical considerations in decisions on new development.

We note the spatial portrait of the borough set out Chapter 2, together with the issues that the emerging local plan will need to address including potential impacts on the historic environment. We acknowledge that the borough (in common with many other London planning authorities) faces complex and difficult choices in delivering new development, such as the number of housing units required over the plan period. Nevertheless, we consider that further evidence and analysis of the results is required for the Council to be able to demonstrate the options being proposed are appropriate and that the likely impacts are understood and therefore avoided if possible or at the very least mitigated.

Indeed, we would suggest that without such an approach there is potential for the basis on which strategic policy SS1 is founded to be compromised. The Plan (and policy SS1) is predicated on areas and specific locations as sites for major development, but if there is not adequate evidence of the impacts of such development on the historic environment then we would suggest it may fail to conform with NPPF paragraphs 20 and 31. Furthermore, decisions on new development in these locations would potentially conflict with policies DE1, DE4 and DE10 – all of which require development to respect and respond to the surrounding historic environment. The resulting ambiguity also presents difficulties in properly reflecting the requirements of NPPF para 16b.

Evidence base – We would suggest that there should be explicit references to the borough's Heritage Strategy and the complete list of Conservation Area Management Plans and Appraisals.



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Strategic Policies PL1-PL7

In line with our comments above, we consider that strategic policies PL1-PL7 underplay the potential effects of the envisaged development on the historic environment, existing local character and significance of individual heritage assets across each area. While it is clear that there are differences in sensitivities to development between the various places, almost all contain designated heritage assets which would be affected to some degree, while the effects of the proposed tall buildings at Meridian Water (PL5) may have impacts both beyond the immediate site boundary and indeed on areas (and heritage assets) in neighbouring boroughs.

As a result, we recommend that the placemaking vision as well as strategic policies for each place including specific reference to understanding, conserving and enhancing the significance of the historic environment, both to better reflect national planning policy but also to align more closely with strategic policies DE1 and DE4 elsewhere in the Plan. All relevant heritage assets should also be clearly identified on maps and diagrams.

PL1, PL6 and PL7 – Enfield Town, Southgate and New Southgate. These areas each contain a concentration of designated heritage assets as well as successful existing character that will clearly be affected by the level of development proposed, including a number of tall buildings. While we note the relevant documents in the evidence base relating to tall buildings, there does not appear to have been any assessment of local sensitivity to such development and therefore the effects of heights proposed on heritage significance. The Plan should be much clearer as to these potential effects and how they will be managed, rather than leaving this to the point of decision on individual planning applications when they will be more difficult to avoid. Using an assessment of significance to determine appropriate heights is key.

PL6 3a – we would suggest this should be reworded *‘the Grade II* listed tube station and its surroundings’*.

PL8 – Rural Enfield



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We welcome the broad objectives of this policy, although as with comments elsewhere in this letter we consider that achieving clause 1 will be made more difficult without the greater baseline understanding of the local historic environment and likely impacts of the scale of development envisaged that we think necessary.

PL9 – Crews Hill

There should be an explicit reference to the historic environment both within the Placemaking Vision and the policy itself. Given the lack of detail it is not apparent whether (or to what degree) there will be impacts on heritage assets in and around the area, including views to and from nearby conservation areas. We would also suggest that Figure 3.10 is unclear as to what it is illustrating.

Given the area's open and undeveloped character, there is potential for archaeological survival. This will need to be considered if the site is allocated.

PL10 – Chase Farm. As indicated above, the Chase Farm area is of concern to us. While the area identified for development contains no heritage assets, it is adjacent to a registered park and garden (currently on the Heritage at Risk register) and a conservation area. As with Crews Hill, the rural and undeveloped character of the site is likely to mean it has archaeological potential. On the basis of the available information it would not appear the site will result in any significant visual impacts to the Trent Park RPG itself as it would appear from the concept diagram in Fig 3.11 (which needs a key) that it will be generally screened by existing (as well as proposed) woodland. It would also appear to be set back from the RPG's east-southeast boundary, although we note that this would appear to conflict with clause 4 of draft Policy PL10 that states the development should front onto Trent Park.

The scale of development proposed is also such that there will inevitably be direct impacts to Trent Park from increased recreational pressure, e.g. wear-and-tear, compaction, erosion, etc. from heavier/more frequent footfall, etc. that will affect condition and result in increased management liabilities compounding the HAR issues present on site. Accordingly, the draft policy should ensure that any development contributes to the conservation and enhancement of the RPG, particularly given its HAR status. As it will lie adjacent to the RPG



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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, and the Council’s aspiration to ‘restore’ it, forms a strong part of the vision for Chase Park – with clear links to the vision for ‘Rural Enfield’ in the associated draft Policy PL8, which includes extensive ‘re-wilding’. It is unclear whether any of this visioning has been based on a detailed understanding of the historic development, form, structure and management of Enfield Chase. For example, there are numerous mentions of woodland surviving from the Chase, which may be true, but Chases were different from Forests and neither were exclusively thickly wooded ‘wilderness’ in the primeval or even romantic sense.

People now associate the word ‘forest’ with woodland, when it is in fact a legal term. Both Chases and Forests were areas subject to Forest Law where only the Lord (in the case of Enfield Chase, the Crown) had exclusive rights to hunt game, and where there were penalties for any actions that would lead to the detriment of said game. They were made up of numerous components of the working countryside, including coverts (woodland, scrub and other vegetation supporting game) but also grassland clearings, fields and areas of ‘waste’, as well as farms, fields, hamlets, manor houses, etc.

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.

We also note the Chase Park topic paper which underpins this section of the Plan. Again, we would suggest that the historic environment plays a less than appropriate role in the future development of the area in this document – for example there is no reference to the historic environment on page 30. In terms of the next steps identified in section 5, we believe it is critical that appropriate expertise in terms of the historic environment plays a meaningful role as the process continues.

Policy SE2 – Sustainable Design and Construction. This policy requires a reference to appropriate methods of refurbishment and/or retrofitting for historic buildings given the potential for maladaptation to damage significance.

Policy DE1 – Delivering a Well Designed, high quality and resilient environment. As indicated above, we welcome this policy and particularly its objective for contextually successful development. Our only comment would be that the reference to public realm in the first sentence is potentially confusing, as it would appear the policy is intended to cover all new development in the borough rather than simply that relating to public realm.

Policy DE4 – Putting Heritage at the Centre of Place Making. Again, in broad terms we welcome this policy and its intention to ensure the historic environment is a key consideration in development decisions.

We would however suggest that the use of the terms ‘Heritage statement’, ‘Heritage Impact Assessment’ and ‘Desk-based Assessment’ should be clarified as they appear to be used interchangeably. Generally, a Desk Based Assessment is required if there is below-ground archaeological potential, but the applicant should always check with the Greater London Archaeological Advisory Service to see if this is appropriate and to get a scope for the work.



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We welcome paragraph 7.4.9 on early engagement on major schemes. It would be helpful to include reference to this enabling better planning of archaeological fieldwork, and to ascertain if significant buried heritage exists which would need to be preserved in situ meaning the scheme would have to be designed around it.

Policy DE6 – Tall Buildings. While we broadly welcome the draft policy itself, we note that the information at para 7.6.2 and figure 7.4 in relation to appropriate locations does not include any reference to heritage significance. As indicated elsewhere, a number of locations proposed for tall buildings contain a concentration of heritage assets, and an understanding of any impacts on these and how an analysis of their significance has informed potential heights should form part of the Plan's preparations.

Policy DE10 – Conserving and Enhancing Heritage Assets. We welcome and support this policy. It would be helpful if it were to contain support for proposals to resolve cases on the Heritage at Risk register within the borough, and to require appropriate energy efficiency measures relating to heritage assets to avoid any adverse impacts on heritage significance through maladaptation.

Site allocations

General comments. It is not clear what the green and amber designations of some of the site allocations means in practice and clarification is required. Similarly, detail as to the 'usual methodology for assigning indicative density' and how this is calculated (or not) is necessary. All relevant heritage assets (including those outside site boundaries but potentially affected by tall buildings) should be indicated on maps and diagrams. For example, there is no reference to Trent Park registered park and garden (or its status on the Heritage at Risk register) in relation to SA28

We would point out that in a number of the site allocation pro formas the sites concerned are not accurately identified in relation to whether they are in an Archaeological Priority Area (APA) – for example SA44 is in *Whitewebbs Hill, Bulls Cross and Forty Hill APA*, and SA56 is in the *Lea Valley West Bank APA* and has significant geoarchaeological potential, while the table



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says they are both outside APAs. These therefore need cross referencing and checking, while the APA layer should be included on the Draft Policies Map.

A number of large, previously undeveloped sites which are outside APAs are identified as having no archaeological requirement. Under the GLAAS consultation criteria these should trigger a consultation for archaeological advice, eg they are over 0.5 ha. For example SA40 – Brimsdown Sports Ground. We would also clarify that where the pro formas state that sites in an APA should be accompanied by a ‘heritage impact assessment’ this should in fact read ‘archaeological desk-based assessment’.

We would suggest a reference to the GLAAS Charter and detail of its selection criteria; for larger sites this means consulting GLAAS on:

- All major planning applications over 0.5 hectares whether in an APA or not
- All Environmental Impact Assessment Scoping requests and Environmental Statements
- Proposed substantial demolition or major alterations to historic buildings – so this could be applicable for sites not in APAs but include listed buildings.

Enfield APAs were last reviewed in 2011 and are due to be updated in 2024. This will mean APA boundaries may be refined and each area will have a longer descriptive document associated with it. The APAs will also be assigned a Tier rating from 1 to 3 depending on their significance.

SA1 – SA7 and SA20-26. Please see comments in relation to strategic policies PL1, PL6 and PL7 above.

SA24-25. Both these allocations are within the setting of the Grade II* listed Arnos Grove tube station, and in the case of SA24 immediately adjacent. While we would not disagree there is potential for development on either site, we also note that tall buildings are also indicated for this area. We would point out that the list description for Arnos Grove station specifically identifies its landmark status in the locale as part of the reason for its special interest. Again,



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we consider that an understanding of the significance of the station itself is necessary to help determine what appropriate building heights should be in this area.

SA45 – which is the site with potential for archaeology relating to the Battle of Barnet. The three fields that make up this area are the last piece of Enfield Chase still owned by the Duchy of Lancaster (since 1419). The site is potentially important as unlike adjacent land it has not been contaminated with green waste and would definitely need pre-determination archaeological fieldwork. It would be good to reflect particularly importance sites like this in their table of site allocations.

Monitoring: It should be noted that the new London Plan policy M1 (Monitoring) contains a new Key Performance Indicator relating to heritage. This is intended to monitor whether the applications that the GLA are consulted on have a beneficial, neutral or harmful impact on the historic environment – we would commend this approach to the Council in its monitoring framework.