

Matter 6: Placemaking areas and associated allocations (outside Green Belt)

Stage 2 hearings

PL1: Enfield Town

SA1.1: Palace Gardens Shopping Centre

The Enfield Society

May 2025

Related Regulation 19 representations:

<https://www.enfield.gov.uk/file/PDFs/email/01794-1-1.pdf>

Policy	Page no.
SS1 Spatial Strategy Paragraph 6: (Placemaking areas)	p9
SS1 Spatial Strategy Paragraph 7: Town Centres	p10
PL1: Enfield Town	p19-20
SA1.1: Palace Gardens Shopping Centre	P49-50
TC1: Promoting Town Centres	p58
TC2: Encouraging vibrant and resilient town centres	p58
DE6: Tall Buildings	P45-46

Issue 6.1: Whether ‘placemaking’ policies PL1-PL8 and the associated allocations are justified, positively prepared, consistent with national policy and in general conformity with the London Plan.

Q6.1. Is Policy PL1 soundly based?

No, because it is premised on ‘regeneration’ which is not justified by the evidence and which could result in demolition of both the 1980s Palace Gardens and the 2000s Palace Exchange shopping centres, the costs and viability of which are not supported by proportionate evidence and which could lead to buildings much taller than indicated in the plan and which would cause substantial harm to four groups of heritage assets.

The precise nature of the harm depends upon the specific building heights. Whereas SA1.1 indicates heights ‘up to 27m’. Paragraph 4 illustrates a general confusion over the interpretation of the NPPF where it says that developments should “*contribute to the setting of the historic environment*”: heritage assets have settings but the historic environment itself does not. Expert evidence is clearly necessary at the Plan-making stage and The Enfield Society has commissioned experts in Heritage Impact Assessment at Archaeology South-East (part of the UCL department of applied archaeology) to prepare a Heritage Impact Assessment (HIA). We have offered to make this evidence available to the examination. Correct application of HIA could secure to SS1, PL1, SA1.1 and DE6 necessary for soundness and to avoid a situation of fundamental conflict between the growth and conservation objectives of the Local Plan.

Beyond the HIA and consideration of substantial harm, there are concerns that tall buildings at SA1.1 of lower heights than those indicated would cause harm conflict with NPPF (December 2024) paragraphs 9 and 135c:

“Planning policies and decisions should ensure that developments...c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).”

The proposals for unnecessary ‘regeneration’ go well beyond the ‘innovation and change’ referred to by the NPPF and would not be sympathetic to the local character and history of the Conservation Area given its particular history and characteristics. This is set out in detail in the Palace Shopping Centre heritage Impact Assessment referred to below, and can be made available to the examination.

This screenshot from the Palace Shopping Centre <https://palaceshopping.co.uk/store-plan/> (accessed October 2024) shows that there are very few vacancies within the shopping centre, which contains an attractive range of shops including a number of ‘anchor stores’. It is not in need of ‘regeneration’.



Furthermore, there is no clear mechanism in the Plan for ensuring that these businesses are retained in the town centre during demolition and redevelopment.

Q6.2. Are the suggested modifications to PL1 set out in document E6.1 necessary to make the Plan sound?

The proposed modification to Figure 3.2 (document E6.1 p10) adds a table listing the ‘infill opportunities’ shown as yellow dots. The proposed table describes them as ‘opportunities for small scale residential development’. However the Council car park site at Portcullis Lodge could accommodate a large number of new dwellings, despite being located in a sensitive part of the Conservation Area.

Two sites (1 and 5) shown in Figure 3.2 (but not included in the list in 6.1) to the rear of Little Waitrose near Enfield Chase station (**B and C** in the map below) could yield 50+ dwellings based on the similar extent of the nearby site at 79 Windmill Hill. These are not ‘small scale’. The Old Court House is a locally listed heritage asset and there is no obvious ‘infill’ opportunity, although it could be a residential conversion – the distinction is important but is lost through the presentation in the Local Plan.



It is not sound and not justified, nor is it legally compliant to introduce new development sites ‘through the back door’ during the examination process, bypassing the established local plan process of allocating sites. As set out in our representations, this could have severe adverse implications for local character and amenity as well as for the historic

environment of the Conservation Area. A number of the sites listed are Council-owned and since these are presumably available, it is unclear why they have not been added into the Local Plan housing supply in addition to the unknown ‘small sites allowance’.

Modifications are also proposed to paragraphs 4 and 5 of PL1 (document E6.1 p 11) which attempt to strengthen protections for the historic environment. These modifications would not be effective in preventing substantial harm arising from tall buildings if other proposed modifications to SA1.1 (see Q6.6 below) and DE6: Tall Buildings are made.

Q6.3: Is there any substantive evidence to suggest that SA1.1 should not be allocated

By allocating the site for redevelopment the principle of demolition and redevelopment would be established. In that policy context substantial harm to heritage assets through excessively tall buildings would be the likely outcome, if that was the necessary price of paying for the development. We have shown that demolition and redevelopment is not justified in planning terms.

Two documents produced by the Council provide compelling evidence that the Palace Exchange (shown in red below) should not be allocated. Palace Exchange is the area of SA1.1 that was redeveloped in the 2000s as shown below.



The Enfield Characterisation Study (document [DES42](#)) states the following on p61: “*The more recent Enfield shopping centre development demonstrates how larger format retail can be more successfully integrated with an historic context.*”...“*The lessons of comprehensive redevelopment in the urban centres need to be learned and mistakes not repeated elsewhere in the borough.*”



Allies and Morrison produced the 2018 *Enfield Town Masterplanning Framework SPD*¹ (see extract right and below, p75) and the exclusion of the Palace Exchange, focusing on “*better use of land around the perimeter*” rather than redevelopment.



SITE 10 - PALACE GARDENS SHOPPING CENTRE

Key principles and land uses

- Opportunities to develop around the edge of the centre should be explored, with scope for development to improve the Cecil Road street edge while also improving access to the centre from the south.
- There may be scope to incorporate larger format commercial leisure uses in the centre through the reconfiguration of existing space and/or the creation on new space on upper floors.
- The edge of the centre along Sarnesfield Road presents an opportunity for new residential development on upper floors.

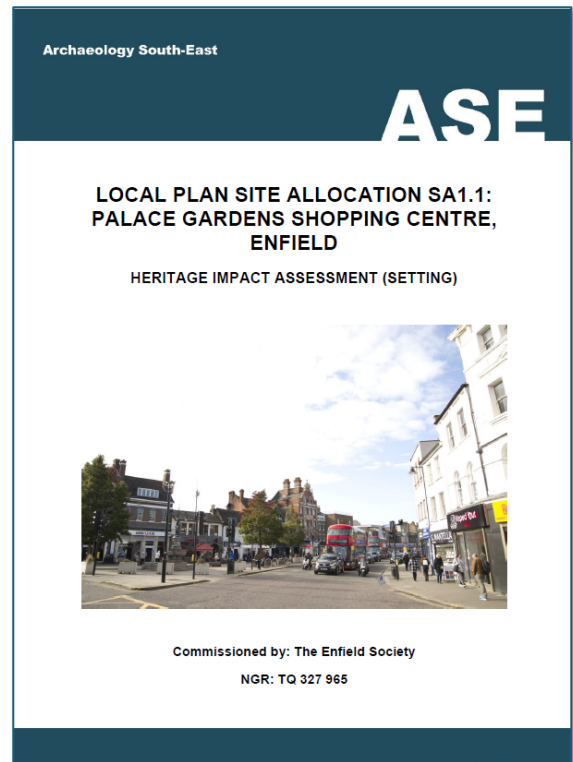
Form of development

- The principal development opportunity at Palace Gardens is to make better use of land around its perimeter for new residential development and stronger street edges.
- Any proposals for new taller buildings within the centre would need to demonstrate that new development protects or enhances the character of the conservation area.

¹ <https://www.enfield.gov.uk/services/planning/adopted-supplementary-planning-documents#enfield-town-masterplan> [accessed 22 September 2024]

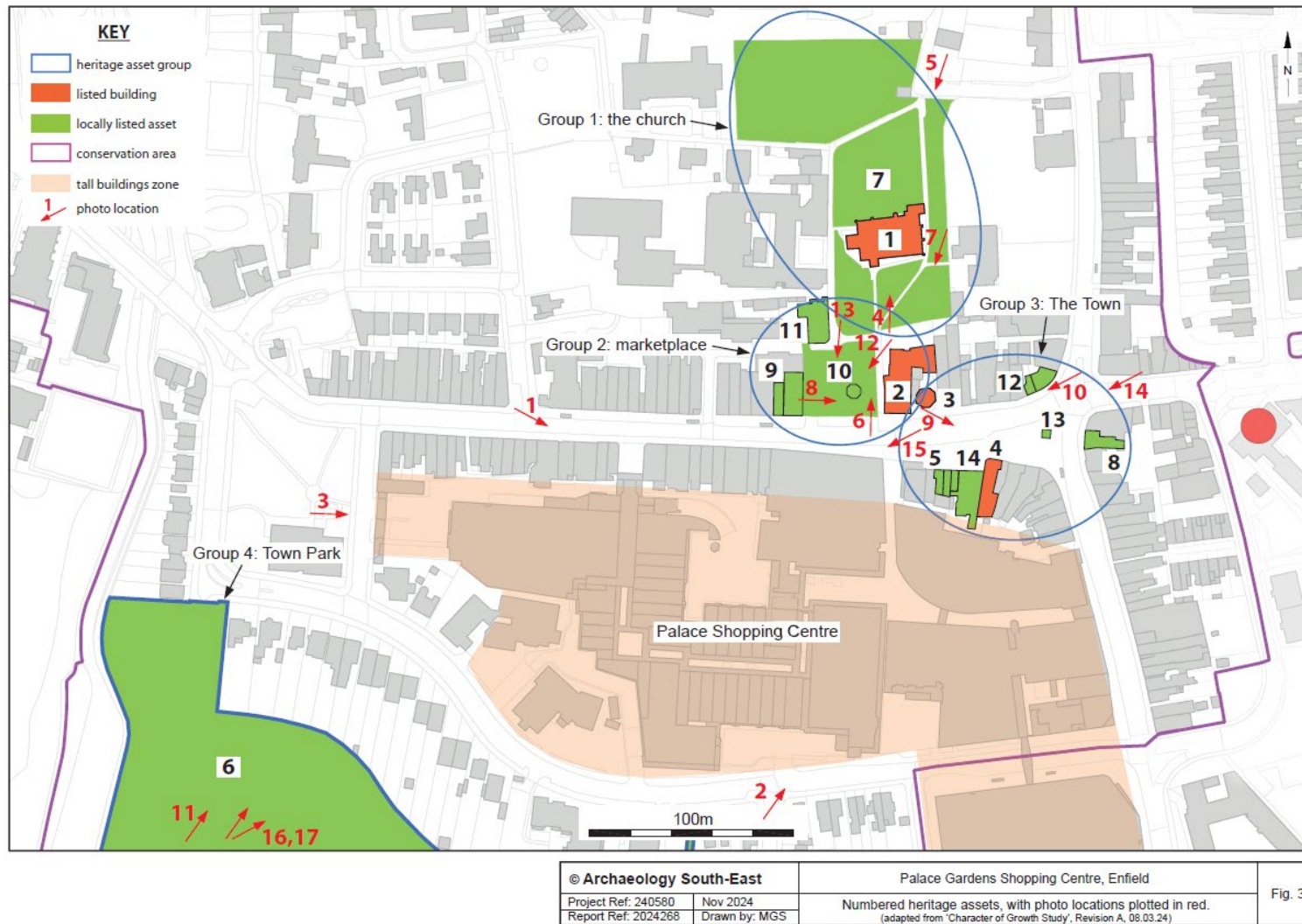
In order to avoid conflicts with national policy, a Heritage Impact Assessment (HIA) at the plan-making stage is required before the principle of demolition and redevelopment is established through an allocation.

The Enfield Society commissioned heritage experts at Archaeology South East (ASE - part of the University College London Institute of Applied Archaeology) to carry an HIA using the modelled views contained within the Character of Growth Study. In summary, the study identified four groups of historic assets within the Conservation Area that would be affected as shown in the plan on the next page. The significance of these assets and their settings is explained in detail in the report. The HIA scrutinises the differences between the four modelled tall building scenarios in DES21 and DES22 and uses an approved methodology to assess the impacts.



Key extracts from the HIA are set out on the next two pages. We have offered to make the full study available, however as the assessment relates to the detail of the Character of Growth Study and the various scenarios therein, given the word limits imposed and a desire not to repeat information we propose to share this detail in the context of examination of Policy DE6: Tall Buildings and Appendix D.

Below: Figure 3 extracted from the Heritage Impact Assessment by Archaeology South-East Ltd



Below: extract from page 32 of the Heritage Impact Assessment (Revision A = 39m, Revision B = 27m)

Table 3 – The impact of the two sets of proposals on the identified groups of heritage assets

Group	Name	Simplified Significance	Contribution of setting to Heritage Significance	Impact of Revision A proposals on Setting	Impact of Revision A on Heritage Significance	Impact of Revision B proposals on Setting	Impact of Revision B on Heritage Significance
1	St Andrew's Church (1) and churchyard (7)	High	High	Substantial	Substantial	Less than substantial	Less than substantial
2	Market place (10) and associated buildings (2, 9, 11)	High	High	Substantial	Substantial	Less than substantial	Less than substantial
3	The Town and associated structures (3, 4, 5, 8, 12, 13, 14)	High	High	Substantial	Substantial	Less than substantial	Less than substantial
4	Town Park (6)	High	High	Substantial	Substantial	Less than substantial	Less than substantial

Summary

- 8.23 The foregoing analysis has considered four coherent groups of heritage assets: the town's three most historic elements (the church, the old deer park and the original market place), together with a fourth element (the present market place) that both foregrounds the church and serves as the centre of the post-medieval town. In each case it has concluded that the 'Revision A' (39m) tall buildings proposed for the Palace Shopping Centre would have a substantial negative impact to the setting and significance of these heritage assets, whilst the impact of the 'Revision B' (27m) tall buildings would only be less than substantial. Although this represents a limited analysis of the impact of one development of tall buildings on four groups of heritage assets, it would be reasonable to extrapolate that the impact on Enfield Town Conservation Area more broadly would likewise be substantial for 'Revision A', and less than substantial for 'Revision B'.

9.0 CONCLUSIONS

9.1 Enfield Town is the commercial focus of the Borough, whose historic core is clearly demarcated from its urban hinterland by various topographical features, and is covered by Enfield Town Conservation Area. The Palace Shopping Centre lies within Character Area A of the Conservation Area, on the southern side of the busy high street represented by Church Street and The Town.

9.2 This heritage impact assessment has been undertaken by ASE for the proposed tall buildings on Site Allocation no. SA1.1: Palace Gardens Shopping Centre, Enfield. It considers the significance of four key groups of heritage assets and the potential effects of two iterations of the proposed development upon their setting: 'Revision A' (height limit of 39m) and 'Revision B' (height limit of 27m). This is in line with the requirements of the *National Planning Policy Framework*. The proposed works are taken to be those outlined in the *Character of Growth* study, which informs the draft *Enfield Local Plan* (pre-publication version, December 2023).

9.3 The results of this assessment can be summarised as follows:

- St Andrew's Church, the market place, The Town and Town Park are identified as the principal groups of heritage assets of relevance to the proposed development.
- St Andrew's Church is a Grade II* listed 12th century and later church set within a locally listed churchyard, of *high* overall heritage significance. It appears on Historic England's *Heritage at Risk Register*. Their present setting is considered to make a *high* contribution to its significance. Key aspects of this are their close spatial relationship with the market place and its historic buildings, which has important views north and south to/from Church Street, and the physical dominance of the church tower in the streetscape, despite modern development.
- The proposed 'Revision A' tall buildings are anticipated to compete with St Andrew's church, eroding its visual separation from the town centre and its status as a dominant focal point. This would cause *substantial harm* to the setting and significance of this group of heritage assets. In contrast, the impact of the proposed 'Revision B' tall buildings is considered to be *less than substantial*.
- The early 17th century market place is flanked on three sides by Grade II Listed and locally listed historic buildings, which forms a group of *high* overall heritage significance. Its present setting is considered to make a *high* contribution to its significance. Key aspects of this are its human scale, its role as a key point of transition north from the busy thoroughfare of Church Street, and the attractive backdrop it provides to St Andrew's Church.
- The proposed 'Revision A' tall buildings are anticipated to introduce an imposing presence along the southern flank of the market place, overtopping the Grade II Listed Barclays Bank and eroding the identity of this area as a coherent historic space. This would cause *substantial harm* to the setting and significance of this group of heritage assets. In contrast, the impact of the proposed 'Revision B' tall buildings is considered to be *less than substantial*.
- The Town is Enfield's likely original centre and market place, lined by Grade II Listed and locally listed historic buildings, which forms a group of *high* overall heritage significance. Its present setting is considered to make a *high*

contribution to its significance. Key aspects of this are its role forming a human scale gateway to Church Street from Enfield Town station, and its major contribution to Enfield's continuing historic market town character.

- The proposed 'Revision A' tall buildings are anticipated to loom above The Town, dwarfing the scale of the existing human-scale historic buildings and eroding its status as an important historic space into a mere backdrop to the rebuilt shopping centre. This would cause *substantial harm* to the setting and significance of this group of heritage assets. In contrast, the impact of the proposed 'Revision B' tall buildings is considered to be *less than substantial*.
- The locally listed Town Park is the largest publically accessible remnant of one of the country's earliest known deer parks, as well as one of the town's principal amenity spaces, of *high* overall heritage significance. Its present setting is considered to make a *high* contribution to its significance. Key aspects of this are its open green space bounded with river and greenery, which has managed to remain largely detached and concealed from Enfield Town.
- The proposed 'Revision A' tall buildings rise above the park's boundary. Together with the handful of existing tall buildings, their cumulative impact would erode the character of the park, from a place that is set apart from the town to one that merely foregrounds it. This would cause *substantial harm* to the setting and significance of this heritage asset. In contrast, the impact of the proposed 'Revision B' tall buildings is considered to be *less than substantial*.

- 9.4 Whilst the 'Revision B' (27m) tall buildings are likely to have a *less than substantial* impact on the setting and significance of the four groups of heritage assets, the impact of 'Revision A' (39m) tall buildings is likely to be *substantial*. This would run counter to the following draft policies contained within the pre-publication version of the Enfield Local Plan:

DE4: Putting heritage at the centre of place making

2. Enfield will work in partnership with stakeholders to:

- f. respond to local context in a positive manner which matches in quality those aspects of the historic environment which make a positive contribution to local character and distinctiveness;*
- g. preserve and enhance our historic landscapes and waterways whilst promoting increased public access to, and interpretation of, these invaluable resources;*

DE6: Tall Buildings

- 7.Tall buildings must be designed to minimise and mitigate harm to the significance of heritage assets and their settings.
- 9.proposals involving tall buildings must demonstrate how they will:
 - b. relate well to the character of the immediate context and its surroundings, taking account of building heights, topography and the pattern of adjoining streets (both existing and planned).*

DE10: Conserving and enhancing heritage assets

3. Enfield will support development which:

- c. conserves and enhances the significance of heritage assets;*
- g. reflects the historic character, use, scale, grain and appearance of an area;*
- h. responds to the setting of heritage assets in a positive manner which conserves and enhances those elements of setting which make a positive contribution to significance.*

5. Development which causes harm to heritage assets will be resisted and will require clear and convincing justification. Additional harm to a heritage asset on the Heritage at risk Register must be exceptional.

6. Substantial harm, total loss of significance or demolition of a heritage asset must be exceptional.

Conclusion

- 9.5 It is conclusion of this report that the 'Revision B' (27m) tall buildings proposed for the Palace Shopping Centre would have a *less than substantial* impact on the setting and significance of the four groups of heritage assets considered above. These heritage assets include the town's three most historic elements (the church, the old deer park and the original market place), together with the present market place, which is the centre of the post-medieval town. However, if the proposed tall buildings were to revert to 'Revision A' (39m), their impact on these heritage assets would increase to *substantial*. This would run counter to a number of draft policies contained within the pre-publication version of the Enfield Local Plan.

Q6.4. Are the development requirements set out in Appendix C for allocations SA1.1 justified and consistent with national policy and would they be effective in securing sustainable development?

The allocation proposes 329 new dwellings in years 5-10. It has not been explained whether that quantum of development can be achieved through two 27m tall buildings as shown on the accompanying plan. In the absence of evidence, there is every possibility that a greater number of taller and more prominently located buildings may be required in order to achieve that scale of development whilst also achieving the other requirements of the policy.

The proposal in SA1.1 part H which states that tall buildings should be “no more than 27m in height” is based on Revision B in the Character of Growth Study DES21 p13, which was discussed with Historic England. The Heritage Impact Assessment by ASE suggests that development over 27m (9 storeys) would cause substantial harm.

Although critical evidence around Heritage Impact is missing from the Council’s evidence base, it is clear from the labelling of the scenarios in the Character of Growth Study that **24m building heights will cause ‘limited harm’ to the historic environment**, and we agree this height would cause harm, albeit limited. 27m building heights will cause more than limited harm but less than substantial harm. **In the absence of a clearly evidenced justification for demolition of the existing shopping centre it is not sound to pursue building heights that will cause more than limited harm.** As we have already shown (Q6.1), the case for ‘regeneration’ is weak, poorly evidenced and does not justify the harm.

Q6.5. Is there a reasonable prospect that SA1.1 could be viably developed at the point envisaged?

It is unclear how current businesses would continue to operate from the town centre such that development could take place in years 5-10.

The long-term leaseholder at Site SA1.1 has chosen not to present any evidence into the Local Plan process. Given that the leaseholder has previously stated that development of less than 26 storeys (78m) would not be viable, and the lack of any viability evidence presented to the Examination beyond the generic whole plan-viability type (which is incapable of yielding meaningful evidence for complex sites of this nature), there seems to be no basis upon which to understand the viability implications for the SA1.1 policy provisions.

It is likely that viability evidence will be presented at application stage in support of development proposals causing high levels of harm to the Conservation Area, contrary to many of the policies in the Local Plan.

Q6.6. Where relevant, are the suggested modifications to allocation SA1.1 set out in document E6.1 necessary to make the Plan sound?

Document E6.1 sets out modifications to SA1.1 and related policies. Collectively these modifications would lead to development inconsistent with national policy in respect of a) the historic environment and b) local character and identity. The modifications maximise the future flexibility of development proposals in terms of the scale, massing and layout of development, even if this were to result in substantial harm to heritage assets, to local character, and to the Conservation Area as a whole.

The table below sets out the proposed modification in document E6.1 and the implications of these for soundness.

Summary of proposed modifications and their implications

No	Local Plan	Summary of modification	Doc E6.1	Implications for soundness
1	DE6 p193	The tall building maps in Appendix D and Figure 7.4 will “carry the status of policy”	p43	These changes establish a policy basis for tall buildings and make it unlikely that heritage considerations would limit building heights contrary, if it was demonstrated that much taller buildings were needed to make redevelopment viable. The HIA demonstrate that this could result in substantial harm to the identified heritage assets.
2	DE6 para 4 P193	Maximum building heights to be replaced with ‘potentially appropriate’ heights	P44	
3	SA1.1 p363	Palace Gardens to be downgraded from Red To ‘Amber’	P71	Red is appropriate and consistent given the evidence of the HIA and the groups of heritage assets that would be impacted by tall buildings. The downgrade to Amber is not justified, particularly in light of proposed Modification no 2.
4	Appendix C 362-554	Plans in Appendix C to be labelled ‘indicative design principles’ to make clear that they do not form part of the policy.	P71	The plan for SA1.1 indicates two tall buildings in specific positions (red stars). If this is to be made indicative rather than having policy status then proposals for a greater number of tall buildings in more prominent locations could be acceptable. This would mean that the heritage harms are unknown and not evidenced at plan-making stage, contrary to national policy.
5	Appendix C P357	Requirement for heritage statements to be added.	P70	Heritage Statements can only influence detailed matters of design and materials, rather than enforce height limits or building locations in the way that a Heritage Impact Assessment through Local Plan policy would enable. Given that building height and position are the main determinants of impacts on heritage assets,
6	SA1.1 P364	New bullet point M development “ <i>must demonstrate how it has responded to the significance of any potentially affected heritage assets and pay appropriate regard to the guidance within the Character of Growth study, relevant conservation area appraisals and conservation area management plans.</i> ”	P72	

7	SA1.1 P364	New bullet point N development <i>“should take particular care to avoid adverse impacts on the Enfield Town conservation area and the setting of the numerous listed buildings on Gentleman’s Row.”</i>	P72	modifications 6 and 7 would be an ineffective means of avoiding or reducing harm. “Responding” to documents such as a CAA does not ensure that harm to the setting and significance of heritage assets from tall buildings would be avoided or reduced.
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TOTAL 2,182 words (excluding extracts from the HIA)

