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# INTRODUCTION

- One of the core planning principles outlined in the NPPF is to secure high-quality development and a good standard of amenity for both existing and future occupants of land and buildings. Design is not just about how a development looks but is also about how well it works and meets the needs of users. It plays a vital role in the functioning of places. Well-designed buildings, places and spaces help to create attractive environments that set a positive context for the development of successful places and sustainable healthy communities.
- The Council is committed to achieving high quality design that responds to the distinctive character of the Borough. Delivering good design is a key element of the ELP. There are many different principles that are involved in achieving good design, including aspects like appearance, how the development fits into the local townscape, its functionality, sustainability, and preservation of local distinctiveness.
- Different places within the Borough have their own distinctive characters that have evolved over time. They are cherished by the local communities as part of the heritage of the area. The Council has carried out a detailed review of the character of its urban areas through the Character of Growth (CoG) study. This document, along with any subsequent updates will be a material consideration when assessing the design quality of development proposals. The Council will also produce Supplementary Planning Documents (SPD) to provide detailed examples of what it considers as high quality design with reference to the policy framework. This may include the production of design codes for the whole, or parts, of the Borough.







Duairdin Mews

# STRATEGIC POLICY

# DE1: DELIVERING A WELL-DESIGNED, HIGH QUALITY AND RESILIENT ENVIRONMENT

- All new development (or interventions in the public realm) must be high quality and design-led. Planning applications for development that are not suitable for their intended function, that are inappropriate to their context, or which fail to have appropriate regard to their surroundings, will be refused.
- 2. Development must take the opportunities available to improve an area in accordance with following characteristics of welldesigned places:
- a. **context** development that enhances the surroundings, maximising the value that the context can bring, including complementing and referencing heritage and natural assets. The design of development must begin with an understanding of, and response to, its context. Applicants should make reference to the conclusions and recommendations of the CoG study;
- identity development that is attractive and distinctive. Locally distinctive or historic patterns of development, landscape and culture that make a positive contribution to quality of life and a place's identity should be reinforced;

- built form development must provide
   a coherent pattern of development where
   public and private spaces, including
   buildings, are clearly distinguished, safe
   and secure;
- d. movement development must be accessible, inclusive, and easy for all to get to and move around. It must connect well with other places, put people before private vehicles, integrate land uses with sustainable modes of transport and encourage active travel. Development should be easy to understand with recognisable and intuitive routes, intersections and landmarks;
- e. nature developments should embrace biophilic design principles, enhance nature and draw it into the urban environment, providing opportunities for all to access it. Development must connect to functional ecological corridors and habitats. Important ecological links must form a structuring principle of any new development.
- f. public spaces all spaces, including streets, should be safe, social and inclusive. They should be well overlooked and activated (particularly at ground

- floor) by surrounding buildings and uses. They must be attractive, uncluttered and suitable to their intended function.
- g. uses Development should contribute to places that provide variety and choice through the provision of a mix of compatible uses that work together to create viable places that respond to local needs.
- h. homes and buildings The interior spaces of all buildings and individual homes must be functional, healthy and sustainable, reflecting the most up to date best practice guidance.
- resources Developments must be efficient and resilient in their use of resources both in construction and operation.
- j. lifespan Developments must be durable and flexible enough to, as far as possible, respond to economic, social, environmental and technological change. Their design and materials should ensure long term resilience and minimise ongoing maintenance.
- 3. All development should create safe and secure places and comply with the principles of Secured by Design.

#### **EXPLANATION**

- The ELP contains a number of specific policies on design aimed at addressing particular issues identified through the plan's evidence base and public engagement. However, all new development must meet high standards of design. Consequently, even where use-specific policies are not included in the ELP, the Council will assess all planning applications in line with the policy mentioned above. The identified characteristics set out above are discussed further in the National Design Guide.
- The Council endorses many best practice publications and will use these, along with their future iterations to help determine whether developments meet with the policy's requirements. These resources include, but not limited to the Urban Design Compendium (Housing Corporation and English Partnerships, 2007), Manual for Streets (Department for Transport, 2007), the Healthy Streets approach (https://www.healthystreets.com) as well as guidance produced on behalf of the Greater London Authority.
- In all cases, development should respect and complement the distinguishing positive characteristics of an area, with specific attention given to the immediate context. This does not necessarily mean creating replica developments.

- Contemporary and innovative design can often has the potential to enhance the local identity, while reinforcing the positive aspects of an area's built form. Likewise, proposals will be required to address cumulative design-related issues identified in the evidence base, such as the loss of greenery along streets, architectural detailing, boundary treatments and the visual impact of car parking areas.
- The Council has undertaken a
  Character of Growth study to inform
  the development of the ELP and ensure
  that new development responds to
  the unique qualities of the Borough
  and its communities. This study builds
  on the work established in the Enfield
  Characterisation Study (2011) and
  describes the existing character of the
  Borough by:
- updating the categorisation of the Borough to reflect recent developments;
- assessing the quality of existing areas through assessment against the characteristics listed in the National Design Guide and other material, including more detailed conservation area character appraisals;
- assessing the presence of local 'drivers of change', for example the presence of existing low-density development in relation to high levels of access to public transport or proximity to town centres;

- making recommendations for the level of change (whether transformative, medium, limited) to the character that would be supported through development proposals; and
- proposing the form of development ('types' or 'typologies') that will be supported in each area based on the existing context and level of change proposed. This includes the consideration of how tall buildings should be defined in different areas, where tall buildings might be appropriate and what heights should be considered.
- The recommended levels of change are shown in **Figure 7.1** taken from the CoG study. Interactive maps of the outputs are available to view in more detail at https://new.enfield.gov.uk/services/planning/evidence-base/.
- Applicants should consult with the crime officers from the Metropolitan Police at the earliest opportunity and include details regarding security measures and compliance with secured by design principles within the Design and Access Statement (DAS). The Council will consult the Metropolitan Police on all planning applications involving major development. In areas with high crime rates, achieving secured by design certification may be required as a condition of planning consent. In situations where conflicts arise between secured by design principles and other urban design objectives, applicants must explain their reasoning behind the compromises made in their DAS.

Level of change

Transformative

Medium

Limited













# **Design and Character**

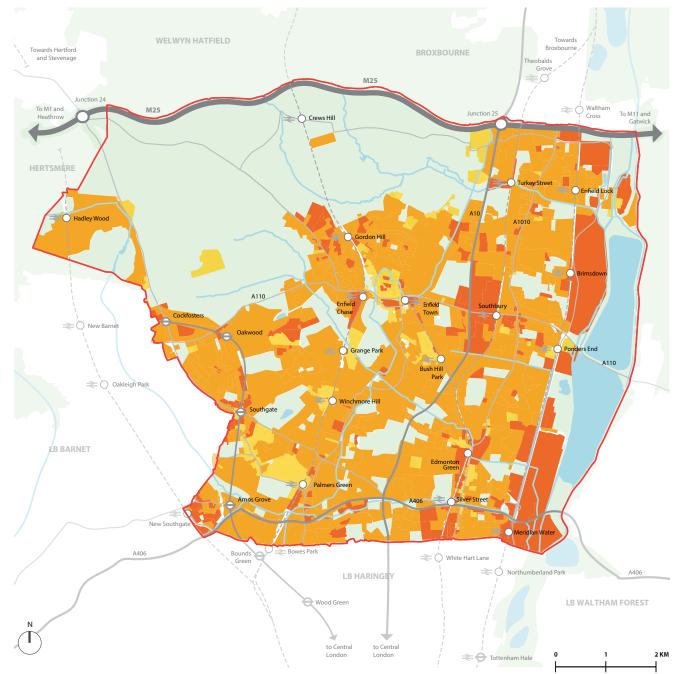


Figure 7.1: Scale of change recommendation

# DEVELOPMENT MANAGEMENT POLICY

# DE2: DESIGN PROCESS AND DESIGN REVIEW

# **Design and access statements**

1. Planning applications accompanied by design and access statements that do not clearly document the design evolution and rationale behind the proposal will not be accepted. They must include an analysis of the site constraints, opportunities and an assessment of how the context has influenced the design and steps taken to avoid harmful effects.

# **Pre-application**

- 2. All planning applications should seek preapplication advice. Planning applications for significant major development should be informed by a thorough and genuine preapplication process. This should involve:
- a. engagement in a planning performance agreement (PPA) that sets a target committee date, expectations, programme of meetings and costs; and
- b. engagement with Enfield's Design Review Panel (DRP), unless advised otherwise.
- 3. All major planning applications must demonstrate a meaningful engagement with local communities that give them real power to shape development. When appropriate, and advised by the case officer, planning applications should be presented to a planning panel.

4. Applicants may be required to provide 3D digital massing models suitable for collation by the planning team to assess cumulative impact of development. This could be in a form that accommodates software, such as VU.City.

# Planning applications and postplanning:

- **5.** Design quality must be maintained through to building completion by:
- a. ensuring maximum detail appropriate for the design stage is provided to avoid the need for later design amendments that negatively impact quality (e.g. to include smoke vents, rainwater goods, grills, signage and other items to be affixed to or interrupt the elevations):
  - i. For major or contentious schemes (such as those within a conservation area; impacting a designated heritage asset or the setting of a designated heritage; or a tall building) a higher level of detail must be submitted. Outline planning consent in these instances will not normally be appropriate.
  - ii. Important design features will be identified and agreed with officers, with input from DRP members or other independent technical experts.

- ensuring the wording of the planning permission, associated conditions and legal agreements provide clarity regarding the quality of design;
- avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or reserved matter (for example through the requirement for the submission of a design code);
- d. requiring that, for important schemes such as those affecting heritage assets, the architect appointed as design lead for the project up to and including planning approval must be retained for the duration of the design and construction of the project. Shall the architect not be retained then a payment under a Section 106 agreement is required to allow the Council to directly employ the architect (or another of their choice) to provide "design guardian" services. This is to ensure that the original design intent is retained up to completion of the project.
- e. Ensuring subsequent planning applications to amend an approved scheme maintain inherent design qualities and public benefits of the approved scheme.















#### **EXPLANATION**

- 7.10 All new proposals in the Borough must meet the design process requirements set out in the National Planning Policy Framework (NPPF) and London Plan. The more detailed processes and actions set out in the policy will help ensure development delivers good design.
- The Enfield Design Review Panel (DRP) will play a key role in assessing the quality of proposals and providing expert, independent scrutiny. This process will follow the guidance established in the London Quality Review Charter. Typically, smaller major schemes can be reviewed at a "small major" workshop. Larger schemes (including those referred to the GLA) will often need to attend multiple panels during both pre-application and submission stages. The Council will provide guidance on the level of engagement with the DRP that is necessary.
- 7.12 It is important that design quality is maintained throughout the development process, from inception through to completion. Changes to designs after the initial planning permission has been granted are often allowable as minor amendments, or in the case of outline applications, in the form of additional necessary details. However, even small

- changes can significantly impact on design quality, environmental quality and visual impact. The cumulative effect of amendments can often be significant and should be reviewed holistically. Approved drawings and other visual materials must include sufficient design details, as well as in the wording of planning permissions should be clear about the approved design to avoid future amendments and value engineering resulting in changes that would be detrimental to the design quality.
- The Council will require key details that are submitted with the planning application to be highlighted in reports and conditions to ensure appropriate scrutiny upon discharge of conditions.
- The scope of the Design Guardian is likely to be limited and confined to the review of external elevations or items that effect the aesthetic look and feel of the building. This may include, for example, internal features visible from the outside and any mechanical and electrical systems that require 'architect's review' and have an impact on the building's elevations and appearances. The scope of Design Guardian can be increased to include the review of key internal spaces including communal areas, principal lobby areas and amenity spaces. The

Design Guardian will be appointed by the Council. The contractor and their design team will remain fully responsible for all technical, contractual, and statutory compliance matters.

Involving the public should be part of the design process to an extent where people have meaningful influence on the development. This engagement should occur at an early stage and provide participants with comprehensive information regarding the pros and cons of design decisions. It should not be limited to minor aesthetic preferences. This approach empowers local residents to shape and therefore support development, not only enhancing the design outcome but also facilitating the proposal's progress through the planning process.



**Design Review Panel** 

















# DEVELOPMENT MANAGEMENT POLICY

# DE3: INCLUSIVE DESIGN

All development will be expected to contribute to creating more accessible, welcoming and inclusive spaces and places. To demonstrate how this has been achieved:

- 1. All development proposals will need an Inclusive Access Statement as part of the Design and Access Statement and as appropriate to the scale of development<sup>36</sup>. Planning applications without this will be refused.
- 2. All development proposals will need to:
- a. reflect the Borough's diverse population;
- ь. demonstrate responsive engagement with affected user groups with relevant protected characteristics as appropriate to the scale and type of development;
- c. support ease of access including and dignified approach to, access around and exit from all types of development minimising segregation of users;
- d. provide flexible spaces that can support adaptation to accommodate changing requirements;
- e. support dignified emergency evacuation provision;

- f. provide Changing Places facilities as consistent with the amended Building Regulations Approved Document Part M as a minimum; and
- g. identify access enhancements for heritage assets affected while maintaining the significance of the asset and its setting.

### **EXPLANATION**

- 7.16 Embracing inclusive design approaches will benefit all communities in the Borough, by reducing barriers to participation, encouraging ease of access and creating more flexible forms of development. Inclusive design encompasses consideration of the journey to and arrival at a site, to moving through it and departing from it.
- 7.17 Enfield has a diverse population comprising many groups with protected characteristics. Initiating prompt and responsive engagement with these affected communities and relevant groups with protected characteristics ensure that their needs are integrated into evolving designs.
- 7.18 Creating inclusive neighbourhoods relies upon on assessing how spaces are accessed and social networks are built. Development proposals must demonstrate, through the Inclusive Design Statement, how accessibility has been considered for more than the immediate site including connections into and out of the area. Access audits should be used as a first stage in the process of understanding barriers to access, particularly for building refurbishments or repurposing, and almost always when a heritage asset is affected.

<sup>36</sup> Inclusive Access Statement should follow the criteria set out in paragraph 3.53 of the London Plan 2021

- 1 2 3 4 5 6 **7** 8 9 10 11 12 13 14 15 A
- **Design and Character**

- flexible to accommodate the needs of both current and future users without requiring significant alterations to the structure. This ensures that residents will continue to experience a welcoming, safe and supportive local environment at different stages of life.
- Segregation or separation reinforces barriers to inclusivity and can result in social isolation. New development should always demonstrate through the Inclusive Design Statement how they have prevented separation in their design process. Where existing properties are refurbished, mitigatory measures should be identified resulting in a net improvement in inclusiveness.
- Emergency escape arrangements for individual with disabilities should be dignified, legible and well-maintained. Employing manual handling for escape purposes does not preserve individual dignity and should only be used as a last resort. Evacuation lifts allow for significantly greater independent use. The Inclusive Design Statement should outline how emergency escape has been addressed with all measures be fit for their intended purpose.
- Changing Places facilities are an essential provision for supporting disabled individuals and their carers to leave their homes with confidence. The provision of Changing Places Facilities is now covered by the amended Building Regulations Approved Document Part M for places of assembly, recreation and entertainment as well as collections of smaller buildings when they are newly built or undergoing major refurbishment. These facilities should be considered a minimum requirement at such locations, and proposals should seek to identify other locations through early engagement.



Trent Park Hous

# STRATEGIC POLICY

# **DE4**: PUTTING HERITAGE AT THE CENTRE OF

- The Council will continue to review and update conservation area designations, appraisals, management proposals and Article 4 Directions; the Local Heritage List; the Heritage Strategy; Register Park and Garden Management appraisals and management proposals as well as archaeological designations, on the advice of the Greater London Archaeological Advisory Service (GLAAS).
- **2.** Enfield will work in partnership with stakeholders to:
- a. Promote positive, well-informed and collaborative conservation which recognises and reinforces the Borough's unique heritage;
- realise opportunities to enhance the Borough's cultural, built and landscape heritage;
- better reveal heritage which is not formally recognised, valued or understood:
- d. seek to enhance heritage assets on the Heritage at Risk Register in collaboration with Historic England and other relevant stakeholders with the aim to remove entries from the Register;

- e. improve access to cultural, built and landscape heritage for the enjoyment and appreciation of everybody in line with best practice;
- 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;
- recognise, preserve and enhance the contribution of trees, hedging and soft landscaping to local character and the setting of heritage assets;
- i. utilise the Borough's cultural, built and landscape heritage to realise wider social, cultural economic and environmental benefits for affected communities; and
- j. identify opportunities to improve the energy efficiency of heritage assets and recognise the value of their embodied carbon in line with current best practice.

- 3. Enfield will take appropriate enforcement action where there is evidence of deliberate neglect of, or damage to, a heritage asset. This will apply to both designated and nondesignated heritage assets.
- 4. Archaeological remains of national significance should be preserved in situ. Where a proposal affects archaeological remains of regional or local significance, developers should mitigate harm as appropriate in relation to the significance of the remains and record evidence to be deposited with the Greater London Historic Environment Record and the local archive.





















#### **EXPLANATION**

# **Conserving Enfield's Heritage**

- Enfield's heritage has been formed by our interventions in the natural and built landscape over the centuries and it remains in a constant state of evolution. The Council is proud of its heritage asset and is committed to placing heritage at the core to its placemaking efforts as the Borough continues to grow and transform.
- Conserving these heritage assets is the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance whilst allowing this dynamic resource to continue to evolve.
- The long-term aspirations for managing the Borough's heritage are contained in the 2018 Enfield Heritage Strategy (or any subsequent heritage strategies).

#### An introduction

- A heritage asset is defined as a building, monument, site, place, area or landscape identified as having a degree of significance that merits consideration in planning decisions, due to its heritage interest. These assets include both officially designated heritage assets and those non-designated assets.
- Designated Heritage Assets include properties such as Listed Buildings (including curtilage listed structures), Conservation Areas, Registered Parks and Gardens, Registered Battlefields, and Scheduled Monuments. Non-Designated Heritage Assets comprise buildings, structures and sites which have special local interest, but have not received formal designation. The Enfield Local Heritage List identifies many of these heritage assets. although it is not exhaustive.
- Inclusions on the Local Heritage List have been based on their special local interest attributed to their evidential. historical, aesthetic or communal value. Their significance as heritage assets will be a material consideration in planning applications. The list of inclusions and new proposals for this list will continue to be reviewed as new information becomes available.



### **Landscapes and Waterways**

- Heritage in Enfield is about more than standing structures. The Borough has an unusually high number of very significant landscapes and waterways which have shaped our community and provide an invaluable resource for both our residents and visitors. These resources are a fragile and finite resource, easily susceptible to irrevocable damage or permanent loss. Whether located in urban or rural settings, these places are an important, distinctive, and much cherished part of our inheritance and we have a duty to care for them.
- received formal recognition as
  Registered Parks and Gardens.
  Registration is a 'material consideration'
  in the planning process, meaning that
  planning authorities must consider the
  impact of any proposed development
  on these landscapes' special character.
- Other elements of our historic environment do not have formal designations. This category includes the remnants of Enfield Chase in the north, as well as the unusual number of highly significant waterways, such as the River Lee, the 18th-century Lee Navigation and the 17th-century New River, all of which played central roles in the development of both London and Enfield.

## **Archaeology**

- Archaeology is the study of the human past using material remains. These remains can be any objects that people created, modified, or used. The Council receives advice on archaeology from the Greater London Archaeological Advice Service (GLAAS).
- Archaeological Priority Areas (APAs) are areas where there is significant known archaeological interest or potential for new discoveries. APAs are used to help highlight where development might affect heritage assets.
- Early engagement with GLAAS will help ascertain at an early stage the presence of significant buried heritage assets

# Heritage at Risk

Historic England maintain an annual Heritage at Risk Register. The Register identifies those sites that are most at risk of being lost as a result of neglect, decay or inappropriate development. The entries on the Heritage at Risk Register will be monitored and the Council will work with partners to reduce the number of assets at risk in the Borough. Where necessary, the Council will make full use of its legislative powers to ensure their preservation.



The Green, at Gentlemen's Row

# 1 2 3 4 5 6 7 8 Design and Character

# DEVELOPMENT MANAGEMENT POLICY

# DE5: STRATEGIC AND IMPORTANT LOCAL VIEWS

- 1. Development is required to positively contribute to the setting and integrity of long distance important local views (as set out in **Table 7.1** and **Figure 7.2**), shorterdistance local views (as identified in conservation area character appraisals and supplementary planning documents) or as identified as important to any other heritage asset.
- 2. Where developments are likely to be visible within designated views, the council will require the production of accurate visual representations of the development from different points within the viewing corridor. Dynamic models, such as VuCity, will often be sufficient. For schemes with a greater impact, fully rendered and verified visual representations may be required in line with the guidance contained within the London View Management Framework Supplementary Planning Guidance<sup>37</sup>. Development will only be supported where the applicant can demonstrate that it does not harm or obstruct the views identified.
- **3.** Where appropriate, opportunities to create new attractive views and vistas as well as local landmarks should be explored.

#### Table 7.1: Important Local Views

IMPORTANT LOCAL VIEWS	SUMMARY OF LOCATION OF MAIN VIEWING POINT
1. Barn Hill	Epping Forest District Council off Daws Hill near Sewardsbury Essex E4
2. King's Head Hill	London Borough Waltham Forest – Kings Head Hill junction with The Ridgeway Chingford E4 7EA
3. Mansfield Park	London Borough Waltham Forest – entrance junction of Mansfield Hill / The Ridgeway / Old Church Road Chingford E4
4. Broomfield Park	Range of views from north west corner of the park (Cannon Hill / Aldermans Hill entrance) looking south into Haringey
5. The Ridgeway (A1005)	Spectacular and extensive range of long distance views from The Ridgeway down to Chase Court Gardens junction
6. Whitewebbs Lane	No set viewpoint but a range of panoramic views mainly looking south across Forty Hall are obtained moving along Whitewebbs Lane and form public footpaths leading off Whitewebbs.
7. Rammey Marsh	Long distance views across the marshes to the open Essex countryside beyond the M25.
8. Clay Hill	Views from junction with Theobalds Park Road, Flash Lane and Strayfield Road.
9. Approach to Enfield Town	From the top part of Windmill Hill near the junction with The Ridgeway down to Chase Court Gardens junction
10. Ponders End	From the bridges over the railway line Nag's Head Road (A110) and Meridian Way (A1055)
11. Meridian Water	Raised road infrastructure offer views across the valley of both natural and urban features. The tall buildings in the City of London (view 11a) and Canary Wharf (11b) are visible to the south and Alexandra Palace (11c) to the south west, can be seen from a number of locations within the Meridian Water Masterplan area
12. New Southgate	View from Station Road looking south towards Alexandra Palace
13. Forty Hall	Views from / to Forty Hall across the historic parkland

 $<sup>^{\</sup>it 37}$  https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs/london-view-management









### **EXPLANATION**

- Enfield has a number of attractive views of skyline ridges and landmarks, which significantly enhance the Borough's overall townscape and landscape. These views provide visual corridors that help to make a significant contribution to a person's ability to understand the geography of the Borough and its position within the wider context of North London. They play an essential role in shaping Enfield's character and identity in line with the National Design Guide. Adopting a positive approach to managing these views and landmarks over the long term is important, particularly given the increasing pressure to accommodate growth and new developments within the Borough.
- While the London Plan identifies and protects Strategic Views, including significant buildings, urban landscapes and riverscapes that help to define London at a strategic level, there are no strategic views traversing Enfield. Nevertheless, there are a number of important local views that warrant protection and positive management. In addition, a number of local landmarks have been identified because they add to the distinctive quality of the townscape and provide points of visual interest. These Local Views and Landmarks are listed in **Table 7.1.** and shown on Figure 7.2.
- Development should seek to enhance public access to viewing locations through public realm improvements. Opportunities should also be taken to create new local views and vistas. Major development, including where multiple sites are to be brought forward comprehensively, present particular opportunities to enhance views. Consideration should be given to the layout, orientation and height of buildings and spaces to enhance existing viewing corridors, or introduce new ones, to help reveal townscapes and landmarks. Additionally, proposals should maximise the visual amenity offered by watercourses in the Borough.
- It is important to note that development often has the potential to enhance views, especially where this contributes to a better understanding of the Borough's layout and the locations of important points of activity, such as town centres.
- Consideration of the contribution of setting to the significance of heritage assets, and how it can enable that significance to be appreciated, will almost always include the consideration of views. Proposals affecting heritage assets and their setting should be developed with reference to Historic England's guidance.



Forty Hall Manor Estate













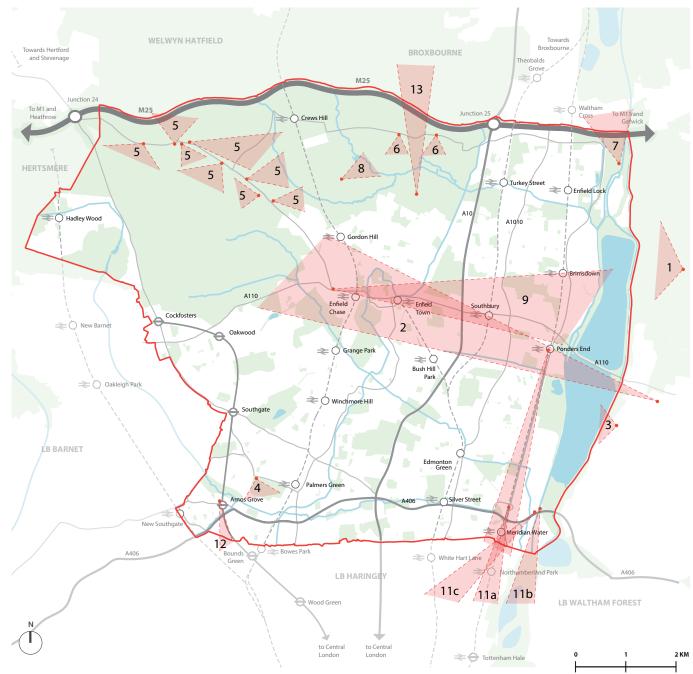


Figure 7.3: Important local views

#### Important local views

- 1 Barn Hill
- 2 King's Head Hill
- 3 Mansfield Park
- 4 Broomfield Park
- 5 The Ridgeway (A1005)
- 6 Whitewebbs Lane
- 7 Rammey Marsh
- 8 Clay Hill
- 9 Approach to Enfield Town
- 10 Ponders End
- 11a Meridian Water
- 11b Meridian Water
- 11c Meridian Water
- 12 New Southgate
- 13 Forty Hall

# DEVELOPMENT MANAGEMENT POLICY

# DE6: TALL BUILDINGS

#### **Definition**

For the vast majority of the Borough, the definition of a tall building is any part of the building (including roof plant) at 21 metres or above. Where the local context warrants a departure from this definition, these areas are spatially identified in Figure 7.3 and associated inset maps set out in Appendix D. If a proposal is defined as tall, it will be assessed against the criteria in this policy. It is important to note that building heights below the definition of "tall" are not necessarily acceptable and are subject to assessment against all other policies in the development plan, including consideration of appropriate scale (e.g. DE1).

# **Location and Height:**

- 2. Figure 7.4 identifies areas where tall buildings (i.e. above the local definition) are acceptable in principle. Tall buildings should only be developed in these areas.
- **3. Figure 7.4** also shows the maximum height that is acceptable in design terms. No part of a building should exceed these heights.
- 4. Proposals for height resulting from unusual

- site conditions (e.g. where the topography creates a lower apparent ground level when viewed from the surrounding area), or where a proposal seeks to introduce a significant civic use that would justify additional prominence will be considered on their merits.
- In policies and/or material considerations.

  Proposals that do not meet the above location and/or height parameters must be justified with reference to the requirements of other development plan policies and/or material considerations.
- Locations identified as appropriate in principle do not permit height across the entire area. Tall buildings will only be supported as part of a coherent strategy. All other policies within the development plan remain relevant in determining the detailed location, form and design of buildings. It should be noted that many of the locations include sensitivities, including those related to heritage assets, and therefore more detailed analysis will be needed to justify proposals. Applicants should also refer to the written guidance on the inset maps (insert ref).

# Impact on heritage assets:

- 7. Some of the locations shown in Figure 7.4 are likely to result in harm to heritage assets, but are supported based on other factors such as the proximity to public transport and/or town centres. Tall buildings must be designed to minimise and mitigate harm to the significance of heritage assets and their settings.
- 8. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm.

# **Design quality**

- 9. In addition to the requirements of policy D9 of the London Plan (2021 and its successors), proposals involving tall buildings must demonstrate how they will:
- a. be of very high architectural and urban design quality (in terms of materials, silhouette, proportion, finishes and the treatment of the surrounding public realm).
- 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.
- be carefully sited to avoid creating a "wall" of tall buildings or isolated and poorly defined buildings and spaces.
- d. provide a positive contribution to the skyline that considers views in the medium, short and long distance as well as contribution to a cumulative impact across an area. Special attention will need to be made to the impact on protected local views [see policy DE5].
- e. reduce and mitigate adverse impacts on the microclimate (including wind and overshadowing) and amenity value of the site and surrounding area (including appropriate computer modelling and/ or wind tunnel testing in line with current best practice).
- f. activate the street frontage and provide clearly identifiable and overlooked entrances.
- g. address the increased challenges that tall buildings can present in meeting environmental performance standards as set out **Policy DM SE4.**

- h. where incorporating residential uses, provide high quality private and communal amenity and play space in accordance with policy DE14.
   Amenity space must address issues with microclimate (e.g. wind at higher levels) and be arranged so that family accommodation has convenient access to well overlooked and secure communal play areas.
- 10. The provision of single aspect homes as a result of a desire to achieve a simplified external envelope will not be supported. The form of the building and the implications for aspect and aesthetics must be considered from the outset.

# Safety

11. Tall buildings must be safely designed to protect residents and users from fire and other emergency situations. Extra scrutiny will be applied at planning stage to ensure safety is considered from design inception, including the materials

- and construction system proposed.
- 12. Due to the increased number of residents, additional scrutiny will be applied to security measures (including secured by design, the use of double lobbies to prevent tail gating and fob access to individual floors). This should be addressed through the design and access statement and may form the subject of a condition.

Key

21m

Area X - XXm

London Plan Minimum Definition

Locally Defined Building Height

**Design and Character** 

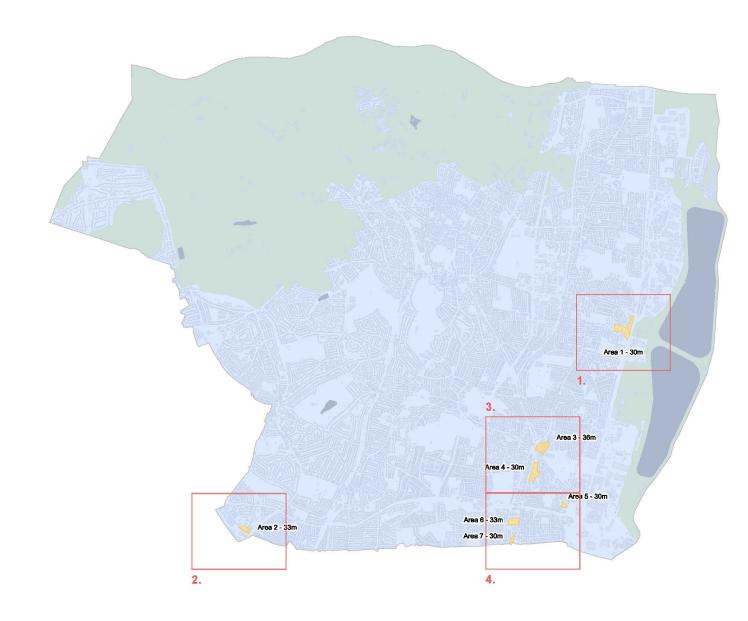
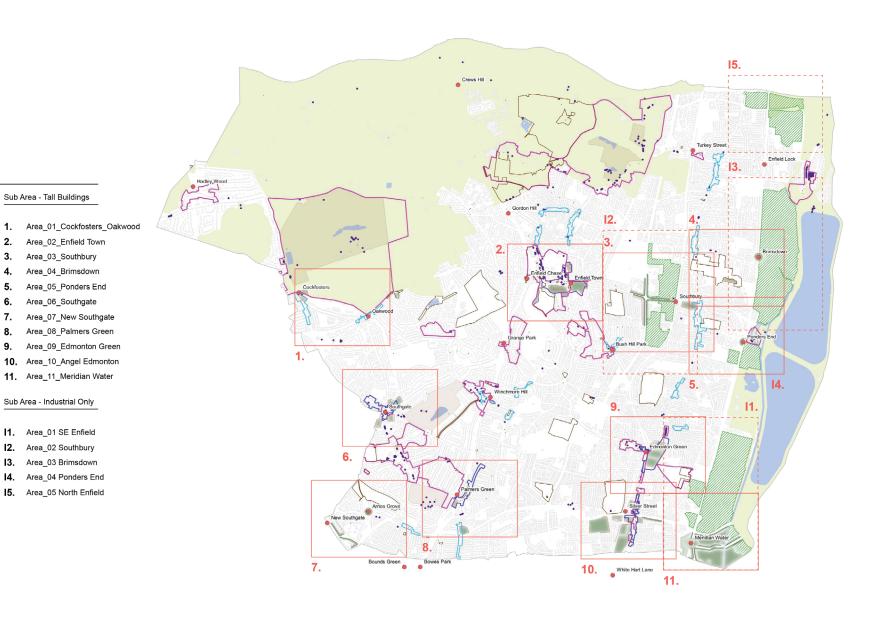


Figure 7.4: Definition of tall buildings

Ν 500m 1000m 2500m 5000m Scale: 1:50000 at A3 195



#### Key

### Tall Building Zones

- Potentially appropriate location for tall buildings
- Potentially appropriate for tall building to mark station
- Linear area potentially appropriate for tall buildings to front major infrastructure

Sub Area - Tall Buildings

6.

14.

Area\_02\_Enfield Town

Area\_05\_Ponders End

Area\_07\_New Southgate Area\_08\_Palmers Green

Area\_06\_Southgate

11. Area\_11\_Meridian Water

Sub Area - Industrial Only

I1. Area\_01 SE Enfield

I2. Area\_02 Southbury Area\_03 Brimsdown

Area\_04 Ponders End

15. Area\_05 North Enfield

Area\_03\_Southbury Area 04 Brimsdown

Potentially appropriate for tall buildings enabling industrial intensification only

#### Context

- Train / Underground Station
- Height sensitive edge
- Conservation Area
- Listed Building
- Local Heritage Assets (2018)
- Registered Parks and Gardens
- Major Centre
- District Centre
- Large Local Centre

Figure 7.5: Appropriate location for tall buildings



# 7 8 9 10 11 12 13 14 15

#### **EXPLANATION**

#### **Definition**

The London Plan defines a tall building as those which are "taller than their surroundings and cause a significant change to the skyline". It requires local definitions based on the local context. These contextual definitions are shown in **Figure 7.3.** 

#### Location

- The assessment of locations appropriate for tall buildings was carried out as part of the Character of Growth Study, located here: https://new.enfield.gov.uk/services/planning/evidence-base/ and is in line with policy D9 of the London Plan (2021). The report sets out the methodology used and the appendices include the assessment tables.
- In summary, the proposed locations for tall buildings have been identified based on their proximity to public transport and amenities, where the existing form of development is deemed suitable for transformative change and where the impact on the location, including heritage assets, can be justified based on housing need and other design and townscape considerations.

- Strategic Industrial Locations (SIL) offer significant opportunity for industrial intensification, which is likely to result in tall buildings. Given the history of larger buildings in these areas and the recognisable nature of such building typologies, it is unlikely to compromise their legibility.
- There are significant opportunities to optimise the provision of new residential and commercial spaces, while providing development that is responsive to the surrounding context. The introduction of tall buildings is acknowledged to affect the character of some areas, and the Council has sought to manage this change based on evidence.
- The locations in Figure 7.4 represent areas of potential change. Illustrative massing was modelled to test the policy (this can be viewed in the CofG report). However, more detailed siting and appropriate height of tall buildings must always be proportionate to the level of importance of the exact location within the proposed area (i.e. the level of relevance to the local and wider community and the degree to which the building helps people to identify locations and navigate the Borough). These considerations are as follows, in line with the London Plan (2021) and National Design Guide (2021):

- The location marks an important point of visual or civic significance, for example educational buildings, hospitals, leisure facilities, community centres, administrative buildings.
- Some height may be appropriate
  to respond to the scale of existing
  infrastructure such as large important
  routes and junctions. However, the
  height should be consistent with the
  importance of these locations and not
  imply they are important destinations in
  themselves in medium and longer views;
- The location is in proximity or within a town centre, which includes Enfield Town, Edmonton Green, Angel Edmonton, Palmers Green and Southgate. Proportionate height may also be acceptable in larger local centres with good public transport accessibility and amenities. Tall buildings might be considered in close proximity to town centres if they are within a short walking distance (up to 400m as measured along the actual walking route) and are appropriate within the context where this does not adversely impact on the visual hierarchy of the location: and



- The location has good (or planned)
   public transport access, typically
   defined as "PTAL 4" and above, but a
   more detailed analysis of the level of
   service, destinations and travel times is
   recommended. Train stations may also
   justify some height, however due to the
   context a height meeting the definition
   of "tall" may not always be appropriate.
- There might be instances where exceptions to height limits for minor ancillary and operational installations, such as communications equipment and flues, may be acceptable provided they do not significantly or adversely impact on the skyline.

# Heights

The heights in **Figure 7.4** have been established following a comprehensive analysis carried out through the Character of Growth study, which includes the use of VuCity to examine their impact on views, townscape and heritage, in collaboration with Historic England. Therefore, any proposals that exceed these prescribed heights will need to be clearly justified based on the need to meet other policies in the development plan and other material considerations. In cases

- where permissions have already been granted for heights exceeding those set out in **Figure 7.4**, such decisions have been reached through a balanced assessment, and this precedent does not overrule the parameters established by this policy.
- Carefully sited tall buildings can contribute positively to the potential of development of sites and serve as prominent landmarks in the skyline, indicating areas of activity and core functions. They are often visible over a wide area. At an early stage of the design process, applicants must assess the impact of tall buildings, including their scale, massing and height on heritage assets and their setting, as well as other areas of sensitivity within the Borough, such as waterside environments, nature conservation sites and open countryside, such as the Green Belt and Metropolitan Open Land. However, it is acknowledged that the juxtaposition of open spaces and visible buildings can make a positive contribution to the townscape and the skyline, particularly where there are other strong drivers for height and in the absence of other sensitivities, such as heritage concerns.
- Tall buildings do not invariably represent the only solution to delivering high quantities of housing and should only be considered where they demonstrably help to optimise the development of sites and form an integral part of a comprehensive approach to development, such as an area-wide masterplan or designated site allocation. In situations where this is not the case, proposals should explore alternative building forms that achieve similar densities. For instance, efficiently designed mansion blocks. terraces or stacked maisonettes can sometimes achieve a similar quantum of development. These building types can offer other advantages, such as better external amenity and reduced maintenance costs.
- Developers must ensure their programme allows sufficient time for the location of viewpoints to be agreed upon with relevant specialist stakeholders. This may involve the provision of viewpoints for different seasons, such as 'winter' and 'summer' views.

# DEVELOPMENT MANAGEMENT POLICY

# DE7: CREATING LIVEABLE, INCLUSIVE AND QUALITY PUBLIC REALM

- 1. All development will be expected to contribute to improving the quality of the public realm in terms of its connectivity, legibility, permeability, accessibility, biodiversity and visual appearance.
- 2. Proposals affecting the public realm must reflect the following design and layout principles:
- a. be consistent with best practice (such as Manual for Streets or later equivalents and the Healthy Streets Approach) and any locally specific guidance produced or endorsed by the Council
- b. be designed to the hierarchy of streets (including quiet neighbourhoods) and spaces as well as the presence of focal buildings, landmarks, squares, nodes and gateways;
- c. improve connections and sightlines to civic buildings, transport hubs, high streets and areas of open space, where possible;
- d. resist the creation of gated communities or privatised areas of pseudo public realm, which do not promote socially inclusive and cohesive neighbourhoods or connectivity between places;

- e. clearly differentiate between public and private spaces and locate building entrances in prominent, publicly accessible locations;
- f. sensitively integrate bin/waste storage and car parking so it does not overly dominate the public realm;
- 3. In considering detailed design, landscaping and use of materials, proposals affecting the public realm must:
- a. retain existing traditional materials,
   boundary treatments and street furniture
   in situ unless it can be replaced to at
   least an equivalent standard or re-used
   within the wider development;
- adopt a consistent palette of materials and street furniture along routes, squares and road verges which can be maintained and replaced/repaired with the same or similar durable materials;
- c. take opportunities to improve biodiversity, for example by lining routes with trees, including appropriate sustainable drainage systems or with other biophilic interventions;

- a. avoid excessive visual cluster and provide good quality signage and lighting to improve wayfinding;
- e. integrate high quality public art, especially at gateway locations or other appropriate landmarks.
- **4.** In creating safe and inclusive places, proposals affecting the public realm must:
- a. create routes and spaces that are safe and accessible to all users e.g. disabled people and children in pushchairs) which are welllit and meet inclusive and active design principles. This includes consideration of access to and movement between public transport modes and stations/stops;
- b. design out concealment points and dead spaces at ground floor level;
- c. increase activity and natural surveillance at ground floor while meeting the minimum defensible space standards;
- d. provide accessible entrances and good access to public facilities (e.g. public toilets, water fountains, baby changing facilities, cycle changing, shower facilities and wayfinding opportunities) to help meet the Healthy Streets indicators;