



# 3 Places

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# INTRODUCTION

- 3.1 The NPPF recognises that creating high quality places is fundamental to what the planning and development process should achieve. The London Plan similarly places ‘good growth’ at the heart of its strategy, with the goal of achieving better, more inclusive forms of growth on behalf of all Londoners.
- 3.2 The Council is committed to meeting its growth requirements, while balancing this with the priority to create high quality, well-functioning places. Enfield is distinguished by its unique qualities and characteristics, ranging from higher density more urban locations with a vibrant mix of uses, to heritage filled town centres, to more rural and natural landscapes. These qualities and characteristics have evolved over many years and constitutes the Borough’s unique identity. Good growth should build on the area’s existing qualities and assets, embedding these into the area’s future identity.
- 3.3 Enfield is home to a diverse array of communities and the Borough’s cultural character is a product of its neighbourhoods, town centres, green and blue spaces, schools, workplaces, community centres and other important local places.
- 3.4 There is a real opportunity for planning and development to improve health outcomes and reduce health inequalities. Healthy places foster the mental and physical well-being of residents and workers by encouraging healthy choices, such as active travel and healthy food choices, embracing a healthy streets approach and minimising negative health effects including those arising from air, noise and light pollution.
- 3.5 New and enhanced green infrastructure also has an important role to play in creating a better place for residents and visitors to Enfield, connecting proposed new developments with their surroundings, promoting biodiversity and creating both private and public spaces of high quality.
- 3.6 To coordinate the delivery of place appropriate development and to ensure a positive, plan-led approach to placemaking, the ELP includes strategic policies for 11 placemaking areas, as shown in **Figure 3.1**. These are:
- Policy PL1: Enfield Town
  - Policy PL2: Southbury
  - Policy PL3: Edmonton Green
  - Policy PL4: Angel Edmonton
  - Policy PL5: Meridian Water
  - Policy PL6: Southgate
  - Policy PL7: New Southgate
  - Policy PL8: Palmers Green
  - Policy PL9: Rural Enfield
  - Policy PL10: Chase Park
  - Policy PL11: Crews Hill
- 3.7 For each placemaking area the Local Plan sets out the main characteristics of the area, a vision for the area and an overarching strategic policy to realise the placemaking vision.

Places

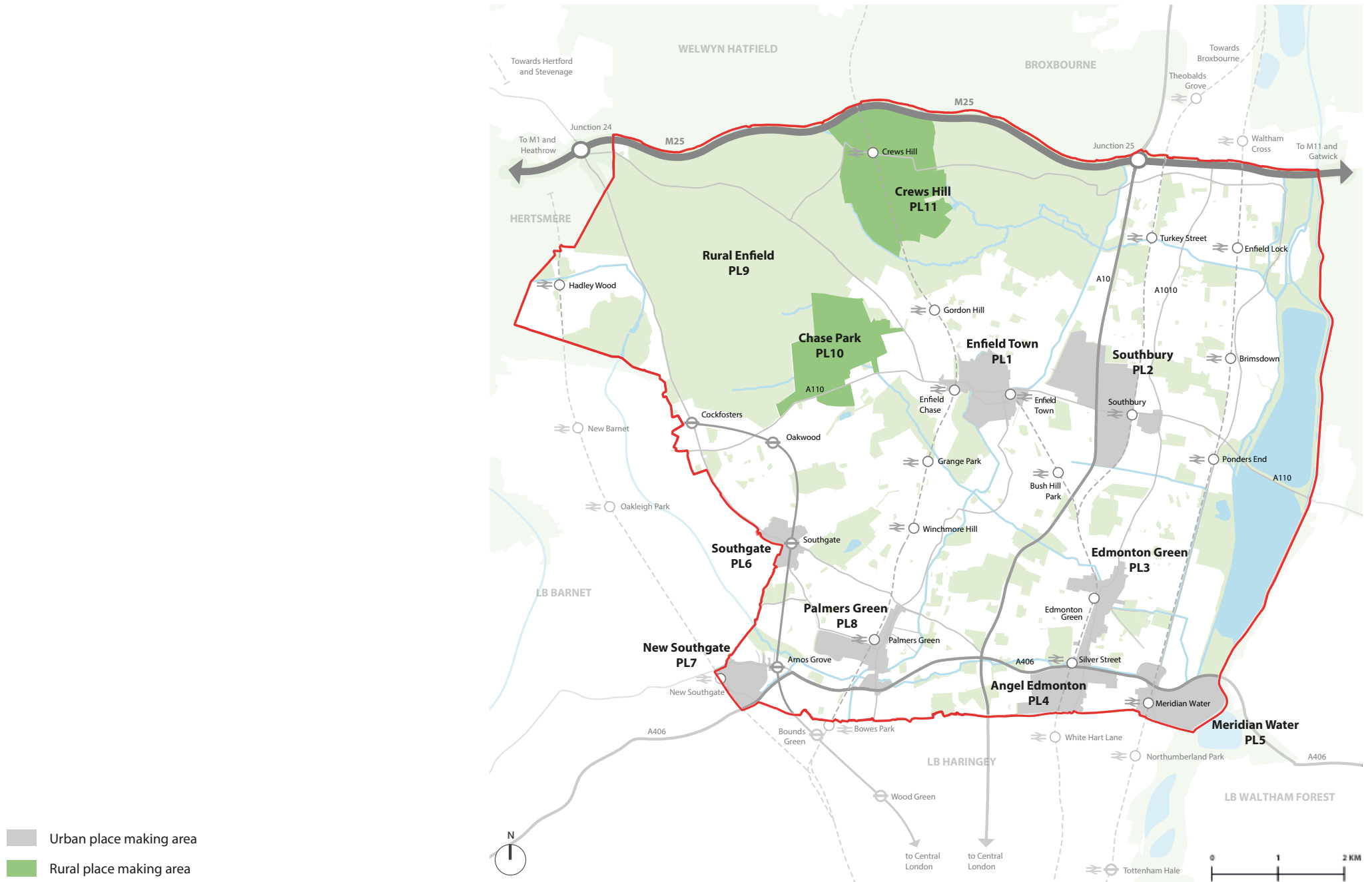


Figure 3.1: Placemaking areas

# PL1 ENFIELD TOWN

## CONTEXT AND CHARACTERISTICS

3.8 Enfield Town sits in the heart of the Borough and is home to a market that was first established in 1303 (and is still operational today). Enfield Town serves as the commercial and administrative focal point of the Borough, while retaining its charming market town character. It is designated as one of London's Major Centres in the London Plan, serving the Borough and beyond.

3.9 Much of the town centre is designated as a conservation area with many attractive historic buildings (and structures) and a bustling market square. Enfield Town is characterised by the presence of numerous historic buildings built during the seven centuries since the market was established. Green spaces such as Town Park, Chase Green and the New River Loop permeate through and around the town centre. The heart of the town centre includes a bustling market square, a historic parish church, civic buildings and the attractive historic areas around Gentlemen's Row and Enfield Grammar School to the north. The town centre predominately features retail shops and is well served by banks and other essential services. However, considering its size, there are fewer

pubs, bars and restaurants than one might anticipate. The southern part of the main high street is home to two large multi-storey car parks and retail developments.

3.10 Enfield Town enjoys good strategic connections, with the A110 passing through the town centre providing crucial east-west links to the rest of

the Borough. Enfield boasts two train stations, Enfield Town and Enfield Chase, offering access to London's Liverpool Street and Moorgate stations to the south, as well as Welwyn Garden City and Stevenage to the north.

## ENFIELD TOWN PLACEMAKING VISION

**Enfield Town will be a twenty-first century market town, where its historic character, including the area in and around the central market square, has been enhanced – including the central market square. It will continue to be the focus of the Borough's civic, entertainment, leisure, commercial and retail activity, and the centre will have evolved to also include a wider mix of uses including new homes. New built form will respond positively to the existing context and character. Access to nearby green spaces and watercourses including Enfield Town Park, will have been maintained and enhanced. New street improvements and public realm projects will draw these green qualities into the heart of the Town and improve the attractiveness of active travel to, from and through the area. It will become an attractive destination for culture and entertainment, acting as an inclusive centre with a successful evening economy.**



## Enfield Town

### Site Allocations

- Housing
- Mixed Use

### Placemaking Opportunities

- Place Making Area Boundary
- ★ New Public Realm Opportunities
- ★ Public Realm Enhancement Opportunities
- Infill Opportunities
- ◆ Enhanced Access to Blue and Green Space
- New Wetlands Opportunities
- ▲ New Rain Gardens Opportunities

- New Green Links
- New Walking Route
- Enhancements to Existing Walking Routes
- Streetscape Improvements
- Blue and Green Space Improvements

### Existing Features

- ✈ National Rail Station
- ✈ Overground Stations
- ★ Existing Public Realm
- Conservation Area
- Locally Listed Heritage Assets
- Listed Buildings
- Major Centre
- Local Centre
- Cycle Routes
- Metropolitan Open Land
- Existing Walking Routes
- Water
- Metropolitan Open Land
- Local Open Space

Note: Refer to table PL01 for details

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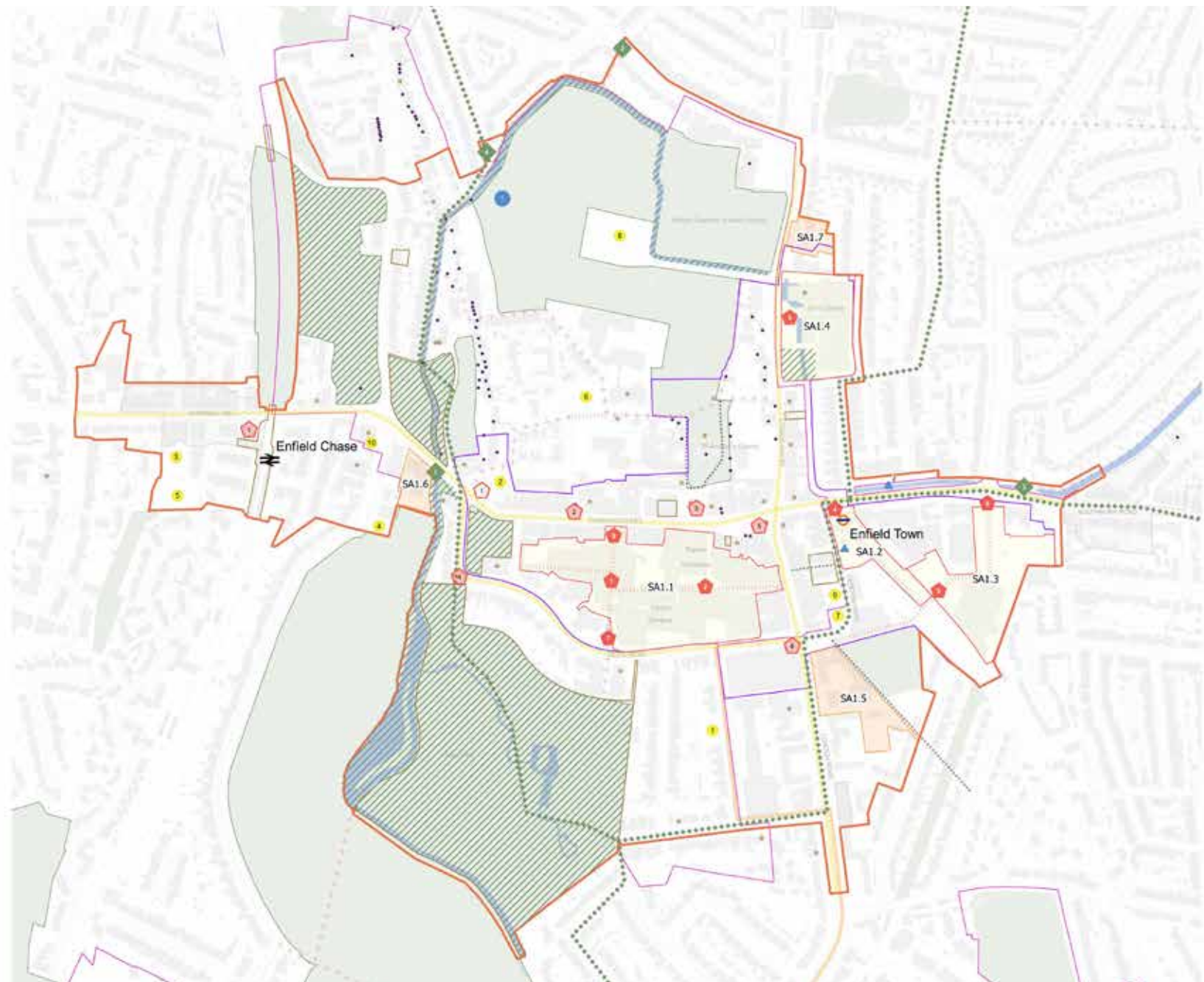


Figure 3.2: Enfield Town Placemaking Plan

## STRATEGIC POLICY

# PL1 : ENFIELD TOWN

To realise the placemaking vision set out in **Figure 3.2**, development proposals in Enfield Town:

1. must contribute to a coordinated process of town centre regeneration that responds positively to the unique context and characteristics of the area, reinforcing its role as the Borough's major centre and principal civic and cultural hub. The Council will prepare further guidance which could include an update of the existing Enfield Town masterplan, or the creation of a new Enfield Town design code to support the delivery of the placemaking vision for Enfield Town. Development here should have regard to such guidance.
2. must contribute to delivering a mix of uses, including new housing, varied retail, cultural and community spaces alongside office and residential development to diversify the centre and improve resilience, whilst ensuring that the centre's predominant civic, commercial and cultural role is maintained and enhanced.
3. must demonstrate how they will assist with securing the centre's long-term vitality and viability. This should include demonstrating how non-residential spaces (Class E) can be flexibly adapted in the long term to respond to changing needs.
4. should demonstrate how they have facilitated enhancements to the fabric and setting of the historic environment. This includes the market square, area around Gentleman's row and the Parish Church and green and blue features such as Town Park and New River. Any developments adjoining the market square will be required to provide active frontages onto this space.
5. must contribute to enhancing the public realm to make walking and cycling in, around and to the town centre significantly more accessible, safer and more attractive. All major developments in Enfield Town must contribute towards improvements to the public realm surrounding Enfield Town and Enfield Chase stations, as well as towards cycling infrastructure through and around the placemaking area.
6. must facilitate and/or contribute to clear and coordinated green and blue enhancements through street improvements and public realm improvements across the placemaking area, with particular attention to reducing surface water flood risk. They should also contribute to enhancing nearby open spaces and watercourses to create a more attractive environment surrounding the major centre.
7. should retain or re-provide existing workspace and deliver net increases wherever possible. A broad range of workspace typologies will be supported within the centre and its immediate surrounds, with priority given to office floorspace and flexible workspace. Provision of workspace suitable for small businesses, will be strongly encouraged, particularly where the space is designed to support the cultural and creative industries.
8. should facilitate a reversal of the inward-looking nature in the south of Enfield Town centre by creating new street-based routes through it; increasing the prominence of entrances and reducing the prominence of servicing and inactive frontages.
9. should minimise the negative impacts of car parking and servicing
10. where they involve tall buildings and other high-density developments must follow the requirements set out in Policy DM DE6: Tall buildings and Figure 7.4 (and any successor policies).
11. should demonstrate how safety and lighting of the walking/cycling routes have been designed to create an inclusive environment that can support an evening economy that is welcoming to all.



## EXPLANATION

- 3.11 The key role Enfield Town plays within the Borough will continue. It boasts a diverse variety of shopping, cultural and leisure amenities. The existing community and cultural assets will be leveraged to establish an enticing destination.
- 3.12 A number of key development sites have been identified as likely to come forward in the plan period. Consequently, a well-coordinated framework that offers additional guidance may be necessary to guide the overarching strategy in this area.
- 3.13 The scale of growth that is estimated to come forward within this placemaking area would be an estimated 1,036 homes in the plan period. This is comprised of seven site allocations:
- SA1.1: Palace Gardens shopping centre
  - SA1.2: Enfield Town station and the former Enfield Arms, Genotin Road
  - SA1.3: Tesco Southbury Road superstore
  - SA1.4: Enfield Civic Centre
  - SA1.5: St Anne's Catholic High School for girls

- SA1.6: 100 Church Street
  - SA1.7: Oak House, 43 Baker Street
- 3.14 Introducing a more diverse mix of uses and functions in the placemaking area is essential to ensure the long term vibrancy of the major centre. There is notable need for a cinema, which is currently absent in Enfield Town, and such a leisure facility would be welcomed. Enhancing the evening economy and cultural offerings is a priority, and any development that encourages this diversification will be supported. Likewise, the introduction of additional employment and housing opportunities will support the vitality of the centre and contribute to the centre's

resilience.

- 3.15 Enfield Town has a unique character. While the centre is expected to evolve to accommodate growth, it must strike a balance by preserving its unique identity, which is rooted in its cultural, heritage and natural assets. Achieving 'good growth', necessitates that developments respond sensitively to these characteristics. This will include revealing, celebrating, restoring and telling Enfield's story, especially ensuring its valued historic environment, such as the market square, the area around Gentleman's Row, the Parish Church, and green and blue features like Town Park and New River are preserved, protected and enhanced. The open



Enfield Town Library

spaces surrounding the town centre provide opportunities for a variety of leisure and recreational activities, all while offering valuable habitats for flora and fauna. Promoting these attributes should be a central aspect of any development proposals that arise.

3.17 Improvements to open space will include:

- enhancements to Enfield Town Park, Library Green and Chase Green;
- upgrading existing entrances to Enfield Town Park;
- strengthening the prominence of the New River Walk;
- enhancing and increasing the significance of the Enfield Loop including the incorporation of east-west cycling links;
- expanding and interconnecting wildlife corridors and/or creating green connections between open spaces to establish wildlife corridors; and
- introducing grey to green corridors along key gateways into the town centre through the use of meadows, and Sustainable Urban Drainage Systems.

3.18 Connectivity to central London is a valuable asset for Enfield Town. As gateways to this area, both railway stations contribute to a welcoming experience for visitors. The current environment surrounding Enfield Town

station is lacking, and it will benefit from enhancement. These areas will be a focal point to create a safer, more accessible, inclusive and pleasing pedestrian environment.

3.19 Traffic dominates the appearance of the town centre and the gyratory creates the impression of an isolated island site. Improvements to the gyratory system and widening pavements are necessary to address safety concerns and create a more pleasant, pedestrian-focussed environment. This will contribute to the creation of a healthy and liveable place that prioritises well-being.

3.20 To accommodate growth, an increased number of tall buildings will be incorporated (in line with the approach set out in London Plan Policy D9 and the Local Plan policy DE6). The appropriateness of their siting will be assessed taking into consideration the findings of the Character of Growth Study, and any updated successor. Design responses will be assessed based on how well proposals recognise the historic quality of the area and realise the potential to create a gateway into the town centre and the Borough as a whole.

3.16 All development must contribute towards enhancing public realm and open space. Public realm improvements should include:

- enhancing access between the town centre and Town Park;
- the renewal of the Enfield Town station building and surrounding public realm;
- creation of a positive sense of arrival at Enfield Town and Enfield Chase stations;
- enhancing the public realm and overall pedestrian environment in the placemaking area; and
- investigating feasibility of enhancing road junctions and circulation, including potential modifications to the gyratory system, along with improving facilities and the environment at all crossing points.

## PL2 SOUTHBURY

### CONTEXT AND CHARACTERISTICS

- 3.21 Southbury is situated approximately one mile east of Enfield Town, on the western side of the A10 known as the Great Cambridge Road. It occupies a strategic east-west position in the Borough, connecting Enfield Town to the Lee Valley.
- 3.22 The Southbury area is currently home to retail parks and industrial parks. The retail park serves a broad catchment area covering most of the Borough and extending beyond its boundaries. The Great Cambridge Road frontages provide a high degree of visibility, therefore attracting high land values for retail purposes. The industrial parks cover approximately 50 hectares and caters to a very large catchment that extends across much of London. They are designated Strategic Industrial Land.
- 3.23 The area is characterised by large format retail and industrial warehousing/shed facilities. It features a mix of employment uses including warehouses, manufacturing spaces, and some office facilities. The majority of these are in good condition. The quality of the public realm is generally poor, offering opportunities for improvement. Surrounding the area are suburban

terraced and semi-detached housing.

- 3.24 Southbury has good transport connections. Southbury station provides train services towards London Liverpool Street and Cheshunt. The A10 offers good north-south road connectivity and has a number of bus routes connecting to Waltham Cross and Turnpike Lane. Southbury Road is well served by bus routes connecting to various parts of the Borough including towards the Lee Valley. However, cycling routes in the area are either incomplete or of poor quality and the vehicle dominated nature of the area creates an unappealing pedestrian environment along key routes.
- 3.25 Within Southbury, there is limited green space, and residents have limited access to such areas. The area faces challenges related to accessibility to nearby green spaces, which are hindered by various physical barriers and obstacles.

### SOUTHBURY PLACEMAKING VISION

**Southbury will be a cohesive, exemplary, high-density, mixed-use quarter with pocket parks and high quality public realm with new street trees and planting. It will be an exceptionally appealing environment for residents and professionals to live and work in. The area will be connected to surrounding open spaces, with enhancements planned for places like the Enfield Playing Fields. Growth here will offer a mix of uses with a residential focus, including some taller buildings that will serve as distinctive landmarks. Additionally, Southbury will play a pivotal role as a gateway to the Lee Valley, Ponders End and Enfield Town. Carefully integrated building and landscape design will be employed to help improve air quality and mitigate noise pollution from the A10. Through intensification and co-location within the Great Cambridge Road Industrial Estate, Southbury will generate valuable local employment opportunities and renewed employment spaces.**



## Southbury

### Site Allocations

- Housing
- Mixed Use
- Industrial

### Placemaking Opportunities

- Place Making Area Boundary
- New Public Realm Opportunities
- New Open Space Opportunities
- Infill Opportunities
- Enhanced Access to Blue and Green Space
- New Rain Gardens Opportunities
- New Green Links
- New Walking Route
- Enhancements to Existing Walking Routes
- Development to Create Active Frontage
- Blue and Green Space Improvements
- New Green Buffer
- Streetscape Improvements

### Existing Features

- Overground Stations
- Conservation Area
- Locally Listed Heritage Assets
- Listed Buildings
- Local Centre
- Cycle Routes
- Strategic Industrial Land
- Locally Significant Industrial Site
- Metropolitan Open Land
- Water
- Metropolitan Open Land
- Local Open Space

Note: Refer to table PL02 for details

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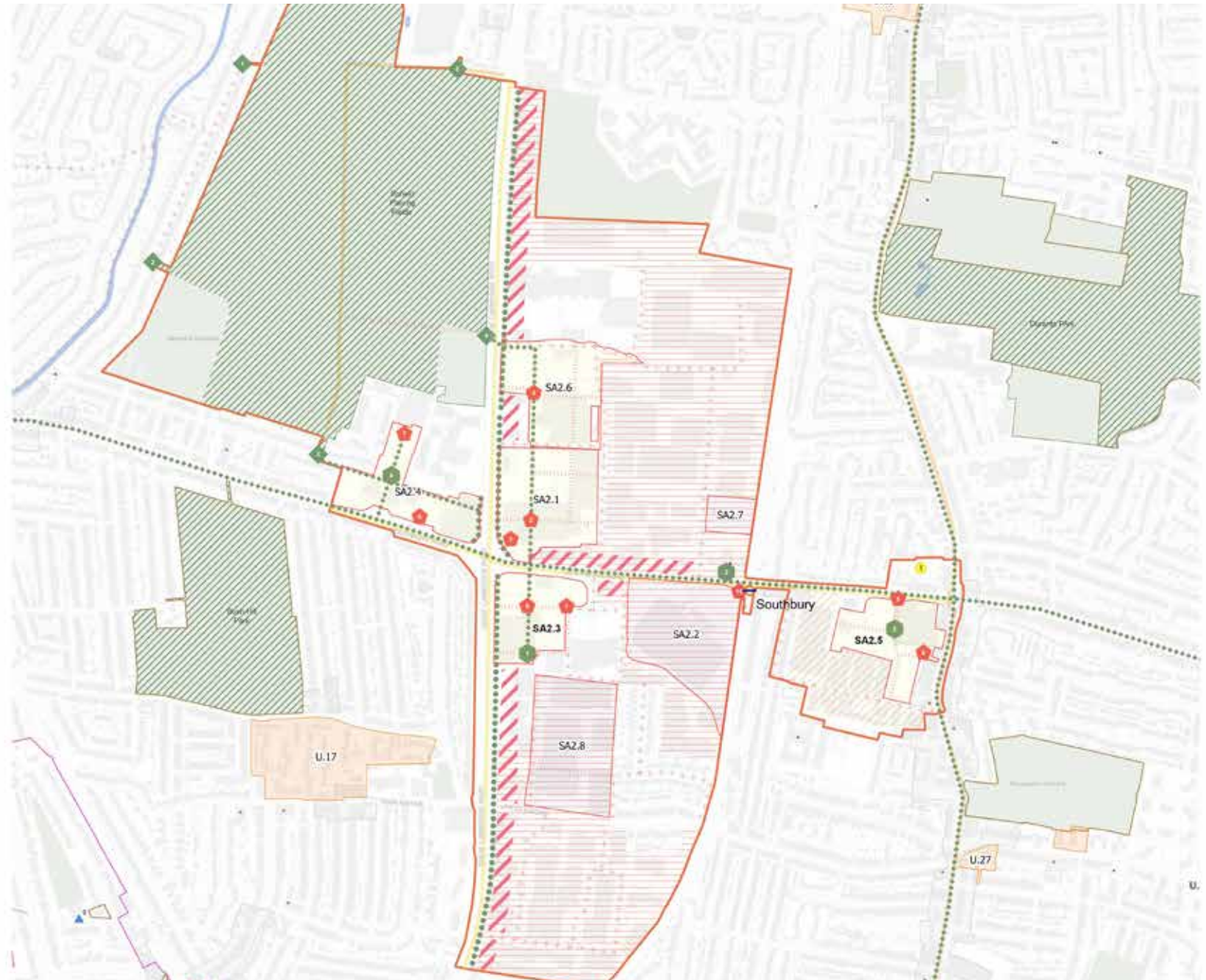


Figure 3.3: Southbury Placemaking Plan

## STRATEGIC POLICY

# PL2: SOUTHBURY

To realise the placemaking vision set out in **Figure 3.3**, development proposals in Southbury:

### **Comprehensive Approach and Masterplanning**

1. must demonstrate how individual developments will contribute to making a good place (in line with Policy SP SS2: Making good places), including how they will:
  - a. lead to an appropriate phased release of the retail parks;
  - b. create a coherently planned and appropriate distribution of scale and massing of built form;
  - c. create urban residential blocks that provide a street network (now and in the future) that will integrate well with surrounding residential areas;
  - d. ensure active frontages are located along key routes through and around the site (such as Southbury Road and the A10) to promote active travel;
  - e. orientate residential blocks to minimise the negative noise and air quality impacts of the A10 on the public realm as well as

within buildings themselves. Single aspect homes or balconies facing the A10 will be resisted; and

- f. ensure tall buildings aid legibility and the heights of new buildings relate appropriately to existing and future surrounding development.
2. should provide an appropriate mix of uses with potential for creating a new local centre. Non residential-uses should assist with growing and sustaining the vitality of the neighbourhood through provision of appropriate employment, leisure uses, community and cultural facilities.
3. must demonstrate how the integration of vital social infrastructure to support the wider placemaking area, such as health or early years' facilities has been considered and addressed. The siting and location of these should be informed by a comprehensive placemaking approach.

### **Enhanced Movement and Connectivity**

4. must reduce severance created by the A10/A110 and improve safety at the key junction between these to ensure it is better utilised.

5. must deliver improvements to the pedestrian environment along the A10 through provision of a green buffer. Improvements along Southbury Road should be delivered through provision of urban greening along this route, which could be in the form of street tree planting. Improvements to support cycling should be delivered by facilitating and/or contributing towards delivery of a new east-west cycle lane along Southbury Road and delivery of a new cycle lane in both directions of the A10 Great Cambridge Road.
6. must contribute to improvements to the public realm and townscape along Great Cambridge Road and Southbury Road. Priorities include improving pedestrian/ cycle routes and signage, installing a new crossing point, planting new street trees and upgrading existing station entrance / forecourt as well as improving safety and security of the station environment. Contributions will also be sought to increase station capacity and to improve station access. Developments in the direct vicinity of the station should assist with enhancing the visual presence of the

station within the wider area.

### Securing High Quality Design

7. must demonstrate that the design of high-density development is of exemplary quality in order to be considered acceptable. The principle of appropriately sited tall buildings - of a suitable scale - in this location will be acceptable to help accommodate growth in line with Policy DE6: Tall buildings and Figure 7.4 and any updating successors.
8. must protect the existing operation and future intensification capacity of designated Strategic Industrial Location (SIL) in line with **Policy E3: Strategic Industrial Locations**. Redevelopment within SIL should support its ongoing productivity by increasing employment floorspace and job density within designated SIL areas and ensuring that proposals for residential uses adjacent to SIL do not compromise the continued integrity and effectiveness of the operation of industrial uses. Proposals for residential uses adjacent to SIL should adhere to the agent of change principle.

### Green Space and Public Realm

9. must deliver or contribute towards the development of new pocket parks, along with contributing to the improved accessibility and enhancements to nearby open spaces, including Enfield Playing Fields, Durants Park and St George's Playing Fields.
10. must incorporate Sustainable Urban Drainage Systems (SUDS) and street tree planting within the public realm, in particular in parts of the placemaking area within Source Protection Zones (SPZ).

### EXPLANATION

- 3.26 The out-of-town retail park in Southbury, presents an opportunity for modernisation to align with contemporary needs and deliver appropriately intensified use of the land. Furthermore, introducing additional employment and housing will bolster the vibrancy of non-residential functions, creating a new local centre and broadening the diversity of available uses.
- 3.27 The substantial growth anticipated in this area necessitates the support of social infrastructure including healthcare facilities such as a GP surgery or health centre, and early years provision like nurseries. While a masterplan or similar is to be prepared to identify the optimal locations for these facilities, developments that proceed ahead of supplementary planning guidance must demonstrate how on-site integration of uses has been considered and will be implemented, where suitable.
- 3.28 Currently, connectivity between Ponders End and Enfield Town is poor. Southbury Road serves as a key route between these areas. Development within the placemaking area can play a pivotal role in enhancing the road junction with the A10, offering a better experience for pedestrians and cyclists. Sites have the potential to facilitate

public realm improvements within the placemaking area through direct provision as part of a development (e.g. to widen footpaths and create new cycling routes) or contributing towards creation of these with financial contributions.

3.31 Several key development sites have been identified for potential development during the plan period. Therefore, the Council will lead on the preparation of a coordinated framework/masterplan to ensure a coordinated and comprehensive approach to future development.

of the Borough's Character of Growth study, as well as any subsequent updates. However, significant opportunity to increase densities exists in the area around Southbury Station and should be explored. Additionally, the potential impact on heritage assets, such as Forty Hall would need to be evaluated.

3.29 The surrounding residential areas face challenges in terms of accessing high quality open spaces. Consequently, new developments should address the deficiency in open space access by enhancing access to nearby open spaces (e.g. Enfield Playing Fields, Durants Park and St Georges Field) and improving their overall quality. The A10 road acts as a significant barrier in accessing Enfield Playing Fields and therefore contributions will be sought towards new crossings where feasible, and the enhancement of existing crossings.

3.32 The scale of growth that is estimated to come forward within this placemaking area would be an estimated 4,228 homes in the plan period. This is comprised of eight site allocations:

3.34 While the area enjoys good connectivity to central London, enhancing the frequency of train services could make it more desirable as a place to live and work, with an enhanced bus offering also helping to improve connectivity within the Borough. Potential to deliver this will be explored in close collaboration with TfL. Furthermore, the area immediately surrounding Southbury station will benefit from enhancement aimed at creating a welcoming entrance environment to Southbury.

- SA2.1: Colosseum Retail Park
- SA2.2: Heritage House
- SA2.3: Morrisons, Southbury Road
- SA2.4: Southbury Leisure Park
- SA2.5: Tesco Superstore, Ponders End
- SA2.6: Sainsburys Crown Road
- SA2.7: Crown Road Lorry Park
- SA2.8: Land and buildings north of Lincoln Road

3.30 Enhancement to existing green spaces will be supplemented by the establishment of new pocket parks within the placemaking area itself. Residential and employment uses should both contribute to the creation of these pocket parks, which offer valuable spaces for enhancing the wellbeing of both residents and employees, with a greater demand anticipated from high-density residential developments.

3.33 A considerable increase in the number of tall buildings is anticipated. The appropriateness of siting of proposed tall buildings will need to be assessed taking into consideration the findings



## PL3 EDMONTON GREEN

### Context and Characteristics

3.35 Edmonton Green, situated in the south-eastern part of the Borough, is one of the four district centres and has a large draw. It features a diverse range of vibrant shopping, community and leisure facilities, including the Council's Leisure Centre and Library as well as a bustling market. A significant portion of the centre's space is designated for surface car parking. Moving westwards and further south along Fore Street, there is also a row of independent shops, cafes and amenities that cater to the local community.

3.36 The area boasts a diverse character, with buildings from a range of periods but is currently defined by the late 1960s and early 1970s shopping centre and its three tall buildings. The inward facing shopping centre creates a sense of disconnection from the surrounding areas. The presence of 'The Green' along Fore Street and the mature trees here, contribute positively to the local character, but it is an asset that could be better used. Salmon's Brook, which runs through the centre is a key asset, with the Salmon's brook path starting at Plevna Road to the rear of the shopping centre, enabling connection from here

along this key leisure route. Just south of this is the newly formed Angel Way cycling and pedestrian route – another key leisure route in the area. To the rear of the shopping centre is an open space between Menon Drive and Colhurst Drive which could be better connected to the town centre.

3.37 Some of the most prominent buildings in Edmonton are the tall buildings that rise above the shopping centre. While they appear out of scale in comparison to the rest of the area, they serve as useful landmarks for the district centre. There are also a number of heritage assets in the centre including the war memorial on the roundabout, the Crescent to the north of the area and a number of listed assets along Church Street.

3.38 The area is centred around the junction between Fore Street, Hertford Road and Church Street, where the overground station (Edmonton Green station) is located. The station provides Overground services, with routes extending to London Liverpool Street station in the south and Enfield Town and Hertford North in the north. The large bus station is also situated at this junction, offering excellent bus connections to various parts of the

Borough and beyond. The environment around the train and bus station can feel dominated by traffic, due to its proximity to major roads.

3.39 Due to the low lying nature of the area, and its location near the confluence of many of the Boroughs main watercourses such as Pymmes Brook and Salmons Brook, the area currently suffers from high levels of flood risk.

3.40 This area includes communities with some of the highest levels of deprivation in the borough and reducing health inequalities is a priority.



Monmouth Green, Enfield



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## EDMONTON GREEN PLACEMAKING VISION

Edmonton Green will continue to thrive as a vibrant centre. The redevelopment of the shopping centre will seamlessly integrate into its surroundings, creating a cohesive and inviting space. The bustling market, complemented by the adjoining public realm will become an attractive focal point of the renewed district centre. Activities will extend along Church Street and Fore Street, fostering increased activity in these areas. The design of roads will prioritise pedestrians, offering an attractive and easily navigable environment with well-placed crossings at the War Memorial junction.

The renewed district centre will host a diverse mix of commercial, cultural, leisure and evening activities around the market. Additionally, a substantial number of new homes will be introduced, supported by community-led facilities and public spaces. The area's distinctive natural features such as 'The Green' will be enhanced, while connectivity will be improved along Salmons Brook and the pedestrian and cycle path to Angel Gardens. Edmonton Green station will undergo enhancements to improve its services and the area will establish stronger connections to Angel Edmonton, Meridian Water and the Lee Valley Regional Park.

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## Edmonton Green

### Site Allocations

- Housing
- Mixed Use
- Industrial

### Placemaking Opportunities

- Place Making Area Boundary
- New Public Realm Opportunities
- Public Realm Enhancement Opportunities
- New Open Space Opportunities
- Infill Opportunities
- Enhanced Access to Blue and Green Space
- New Wetlands Opportunities
- New Rain Gardens Opportunities
- Railway Arches Opportunities
- New Green Links
- New Walking Route
- Enhancements to Existing Walking Routes
- Streetscape Improvements
- Blue and Green Space Improvements

### Existing Features

- Overground Stations
- Conservation Area
- Locally Listed Heritage Assets
- Listed Buildings
- District Centre
- Local Centre
- Cycle Routes
- Metropolitan Open Land
- Water
- Metropolitan Open Land
- Local Open Space

Note: Refer to table PL03 for details

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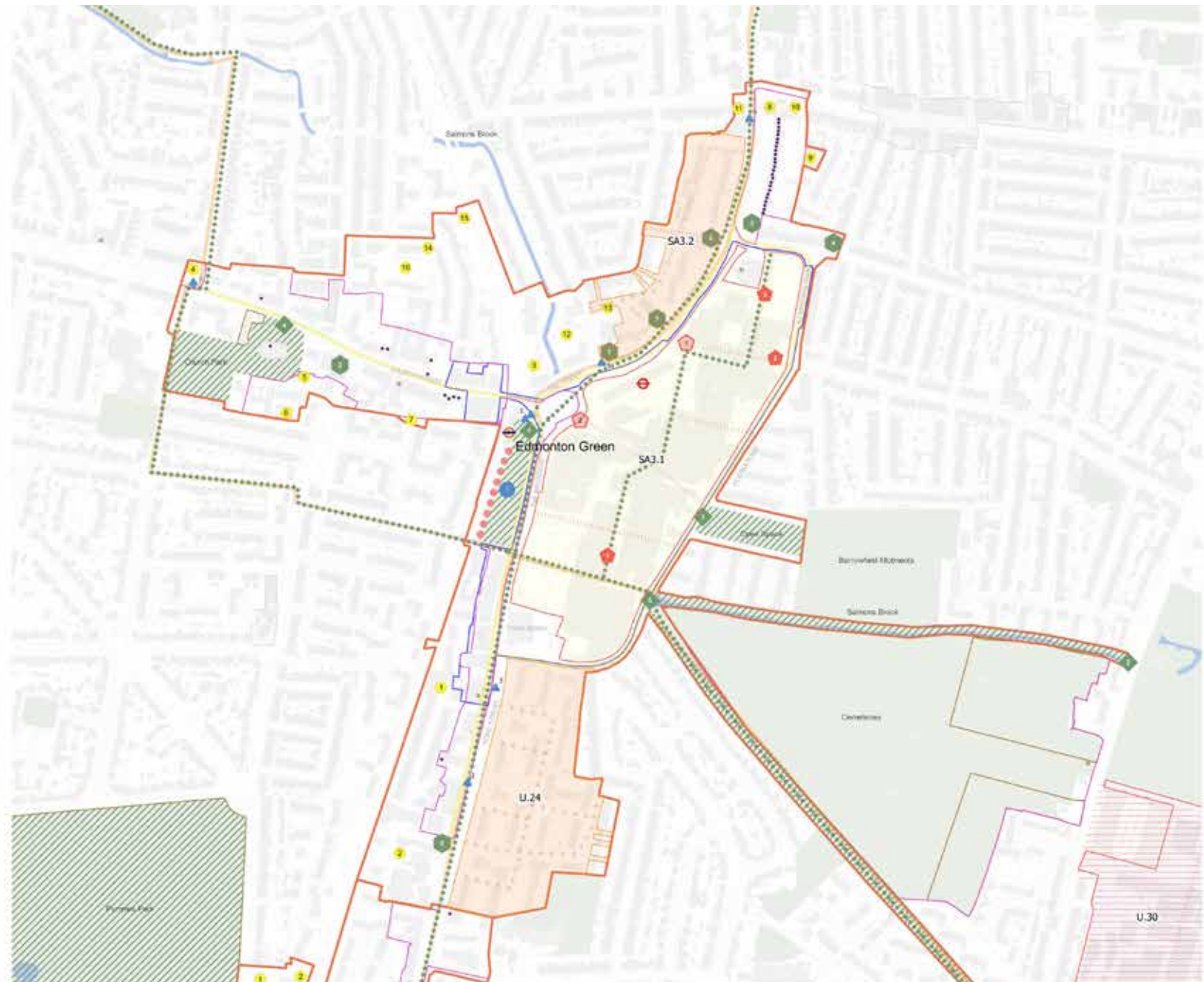


Figure 3.4: Edmonton Green Placemaking Plan

## STRATEGIC POLICY

# PL3: EDMONTON GREEN

To realise the place vision set out in **Figure 3.4**, proposals for development in Edmonton Green:

### Comprehensive Approach and Masterplanning

1. must contribute to a coordinated process of regeneration that responds positively to its unique context and characteristics, reinforcing its role as a district centre. Proposals here must have regard to the Edmonton Vision – and assist with delivery of the key objectives set out here. The Council may use planning tools to build upon this vision, such as preparation of a detailed design code and sustainable place making strategies to support the delivery of the Local Plan to supplement this policy.
2. must contribute to creating a revitalised town centre, by ensuring that a significant amount of new development is directed to the district centre. This will include an intensified range of activities and provide a more diverse mix of commercial, leisure and evening activities together with a large number and range of additional homes supported

by new community and cultural facilities, jobs, public realm improvements and revitalised open spaces.

3. must deliver a coherent and outward looking high-street creating new street-based routes which increase the prominence of entrances and reduce the prominence of servicing and inactive frontages. Development should successfully stitch back into the surrounding context and enhance the pedestrian and cycle network in line with the aspirations set out in Figure 3.4.

### Design, Character and Identity

4. must re-provide a covered market ensuring that it continues to act as the focal point of a revitalised high-street based shopping area. Its location in the district centre may be repositioned to enhance its prominence.
5. should demonstrate how they have responded appropriately to the components of historic and cultural heritage that form Edmonton Green's identity. Distinctive features such as the nearby greenspaces including the Green should be retained and enhanced.

Proposals in the area will be expected to contribute to removing the Fore Street and Church Street conservation areas from the Historic England register of Heritage at Risk and enhancing those at The Crescent and Montagu Road Cemeteries.

6. should only include tall buildings in those locations identified as being appropriate for tall buildings having regard to the requirements of Policy DM DE6: Tall buildings and Figure 7.4 and any updating successor.
7. should concentrate new employment generating development within the district centre. This may include introducing a wider range of job opportunities, and leisure, food and beverage opportunities to diversify the centre and improve resilience. Opportunities should also be taken to deliver new and improved workspaces through the intensification of sites along with improving the quality of existing employment spaces.

### Public Realm and Landscaping

8. must contribute to enhancing the public

realm to make use of public transport, walking and cycling safer and more accessible and attractive. This will include improvements:

- a. between buildings, the shopping centre and railway line through the introduction of urban greening and the creation of lively streets and a safer environment;
- b. to and around Edmonton Green overground and bus stations, as well as enhancements to the sense of arrival creating a distinctive entrance into the town centre, to create greater public transport and cycle access. Car-free developments will be strongly encouraged and supported;
- c. to enhance wider links to Angel Edmonton and Meridian Water and the Lee Valley Regional Park.
- d. to retain a bus station with improved pedestrian linkage between it, the high street and the station.

### Enhanced Movement and Connectivity

9. must encourage a modal shift in the area through reduction of car parking and improvements to walking, cycling and public transport infrastructure.
10. should explore the following further

infrastructure improvements where feasible:

- a. improvements to bus services and connections to ensure good public transport access. The Council will also work with TfL and others to upgrade access and capacity at Edmonton Green Station;
- b. the integration of sustainable urban drainage (SuDS) measures and urban greening into the public realm as well as buildings, to reduce flood risk, ensure a significant net gain in biodiversity and reduce the heat island effect. The Council will support the introduction of rain gardens, swales and other sustainable urban drainage features as well as opportunities to deculvert Salmons Brook, where feasible reinforcing the role of Edmonton Green as an important community asset for the Borough; and
- c. the potential to remove the current roundabout and connect the war memorial island to the station or concourse to provide safer more direct connections and more useable open space. Any changes to traffic circulation must safeguard the continued operation of the bus station with no loss of efficiency or overall capacity

The Council will work with landowners, developers and stakeholders to help unlock these opportunities.

11. should play a large role in making Edmonton greener and more resilient to climate change. Major development will be expected to connect to, and extend the existing network or safeguard connection to the planned future heat network on or in proximity to the site. Minor developments should optimise opportunities to connect to existing heat networks.
12. explore opportunities to enhance the environment around the railway arches through regeneration.

## EXPLANATION

3.41 Growth in Edmonton Green aims to rejuvenate and strengthen its role as a crucial district centre. This transformation will turn the currently inward-looking shopping centre into an outward facing, better connected, safer and greener piece of the urban fabric based on high-quality new streets and public spaces. To achieve this, there should be a diversification of main town centre uses. Intensification along the high street and Church Street beyond the shopping centre will also support this.



Edmonton Town Hall clock

3.42 The introduction of a greater mix of uses will not only support the centre's vitality and viability but also add to its resilience. While retail uses will continue to play a valuable role in serving the existing community, the ongoing shift towards on-line shopping and decline of bricks and mortar retail necessitate the introduction of additional reasons for people to visit and spend time in the town centre. This includes rejuvenated community services, office spaces and workspaces, leisure activities, more dining and entertainment establishments, and an improved public realm for gatherings and socialising. Increased density should be matched by the provision of appropriate levels of community and cultural facilities, further enhancing the centre's resilience.

3.43 The covered market, a valuable local asset contributing to Edmonton's unique identity, must either be retained or re-provided in a suitable and appropriate location. Additionally, the evening economy can transform the area into a vibrant place with activity throughout a greater part of the day to

bolster the centre's success and vitality.

3.44 Edmonton Green as a district centre with excellent transport connections is poised for significant transformation to accommodate more homes and facilities serving a wider area while offering a wider range of employment opportunities for local residents. The mix of homes in this area should seek to serve local need and complement the existing variety of dwellings and tenure mix.

3.45 Growth will involve an increase in the number of tall buildings. Given the presence of existing tall buildings, the area's mixed-use nature, accessibility via a railway station, and its strategic location along the route connecting nearby centres, it is considered an appropriate location for tall buildings to help with housing shortfall. Tall buildings, where appropriate, should contribute to the creation of much needed new homes, surrounded by more generous and well-designed public realm to improve the pedestrian experience. Any such proposals should have regard to policy DE6 (Tall Buildings).

3.46 Redevelopment of the shopping centre



presents an opportunity to establish new active frontages and improve permeability across the site. This will involve connecting existing streets and pathways resulting in increased activities in this part of the town centre throughout the day and an improved pedestrian experience, alongside public realm improvements. These changes will foster a more pleasant, pedestrian-focussed environment, enhancing nearby open spaces.

3.48 The scale of growth that is estimated to come forward within this placemaking area would be an estimated 1,608 homes in the plan period. This is comprised of two site allocations:

- SA3.1: Edmonton Green Shopping Centre; and
- SA3.2: Chiswick Road Estate
- URB.24 Fore Street Estate

3.47 The Salmons Brook, a hidden asset in the area, holds significant potential to contribute to the placemaking vision. It will play a key role in building climate resilience into the public realm, creating an appealing and distinctive environment. The combined factors of high levels of deprivation and the specific demographics of the area have led to poor health outcomes for many residents. Improving connectivity to open space and promoting active travel can assist in fostering healthier lifestyles. Drawing attention to Salmon's Brook through regeneration will also uncover an element of the area's history. This heritage focused approach will enrich the character of the district centre and connect it back with its past.



Edmonton Green Shopping Centre

## PL4 ANGEL EDMONTON

### Context and Characteristics

- 3.49 Angel Edmonton, located to the south of the Borough adjacent to the border with Haringey, serves as one of the Borough's four district centres meeting the needs of the local community exceptionally well. This is reflected in how well-used it is. The central hub of activity is Fore Street, which boasts a variety of shops and amenities, predominantly featuring independent retailers that mirror the neighbourhood's diversity.
- 3.50 The area exhibits a diverse character with historic assets and two conservation areas contributing to its character. Beyond the high street, the surrounding residential areas primarily consist of low rise suburban terraced housing, interspersed with modernist blocks in council estates such as Joyce and Snells and Upton and Raynham estates. There are also more recent higher density developments like Highmead on Fore Street.
- 3.51 Fore Street runs through the heart of Angel Edmonton, connecting Edmonton Green district centre to the north and Tottenham to the south. Although the high street benefits from a good bus

network and the nearby Silver Street overground station, access to the station involves crossing Stirling Way/A406, a major arterial road that poses a significant barrier, especially for pedestrians and cyclists. The presence of level changes and pedestrian railings exacerbates this issue and acts as a barrier to movement.

- 3.52 Silver Street station offers direct services to London Liverpool Street station to the south and Enfield Town and Hertford North, to the north. There is potential for better integration of the station with the high street and neighbourhoods to the south, achieved through the establishment of new and enhanced walking routes and public realm improvements to create a more pleasant, pedestrian-focussed environment.
- 3.53 Similarly, despite having several smaller parks in the vicinity, Angel Edmonton lacks good connection to a larger park. The nearest large park is Pymmes Park, which faces a similar issue of being disconnected from the main residential areas due the major road (A406). There is an opportunity to improve the connection to this nearby asset.

- 3.54 In the west, the North Middlesex Hospital is a major employer and a focal point for the community. The large-scale hospital buildings define the character in the western part of the neighbourhood. Ongoing rationalisation of the NHS estate offers an opportunity here for change and a softer transition between the large scale medical facilities and the surrounding two-storey terraced housing.



Angel Edmonton

## ANGEL EDMONTON PLACEMAKING VISION

Angel Edmonton High Street will be revitalised through community-led initiatives and anchored by a range of new community, cultural and recreational facilities. This transformation will also encompass spaces designed to nurture small businesses and entrepreneurship. New connections will be made across the North Circular Road (A406) minimising the impact of traffic flows, while embracing clean air measures to help support reduced reliance on motorised transportation.

At the heart of this transformation, the North Middlesex University Hospital campus will see development, enhancing the environment around the A406. The primary mode of transport will be active travel, with attractive opportunities for pedestrians and cyclists, facilitated by upgraded streets and on principal routes, all interconnected. New green active travel corridors will seamlessly link the emerging neighbourhood at Meridian Water to Edmonton Green, passing through Angel Edmonton.

These active travel corridors will also link with a network of enhanced pocket parks within the area, reinforcing connections to Pymmes Park to the north and Bull Lane to the south. The Selby Centre's regeneration will emerge as a renewed community beacon, park and sports facility. Upton and Raynham and Joyce Avenue and Snells Park, will undergo a remarkable transformation, evolving into high-quality mixed tenure neighbourhoods. These areas will serve as exemplars of sustainability and placemaking creating a vibrant and sustainable community.



Angel Yard



## Angel Edmonton

### Site Allocations

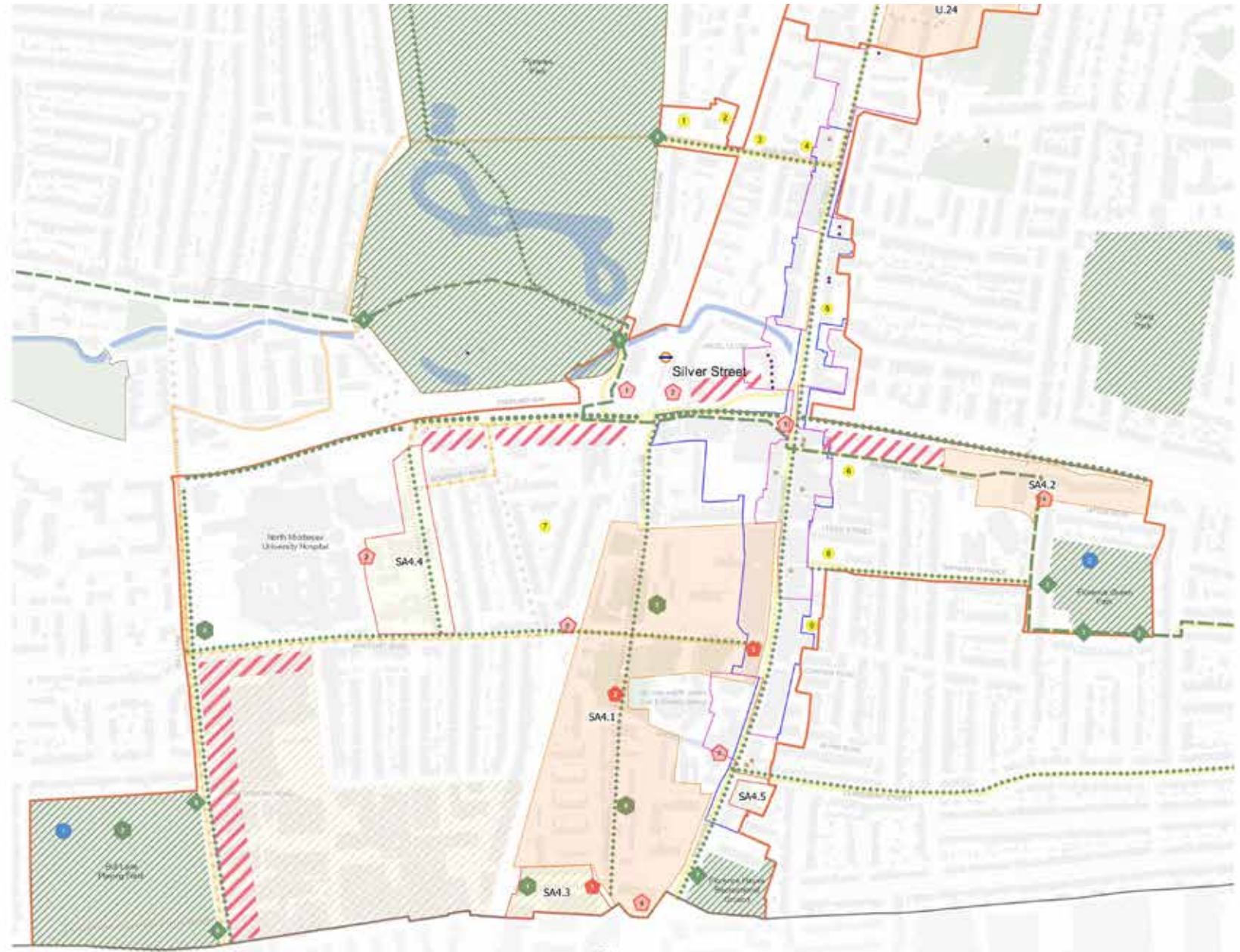
- Housing
- Mixed Use

### Placemaking Opportunities

- Place Making Area Boundary
- New Public Realm Opportunities
- Public Realm Enhancement Opportunities
- New Open Space Opportunities
- Infill Opportunities
- Enhanced Access to Blue and Green Space
- New Wetlands Opportunities
- Enfield Green Loop
- New Green Links
- New Walking Route
- Enhancements to Existing Walking Routes
- Development to Create Active Frontage
- Blue and Green Space Improvements
- New Green Buffer
- Streetscape Improvements

### Existing Features

- Overground Stations
- Conservation Area
- Locally Listed Heritage Assets
- Listed Buildings
- District Centre
- Local Centre
- Cycle Routes
- Locally Significant Industrial Site
- Metropolitan Open Land
- Water
- Metropolitan Open Land
- Local Open Space
- Borough Boundary



Note: Refer to table PLO4 for details

N 0 50 100 m

Figure 3.5: Angel Edmonton Placemaking Plan

## STRATEGIC POLICY

# PL4: ANGEL EDMONTON

To realise the place vision set out in **Figure 3.5**, development proposals in Angel Edmonton:

### Comprehensively planned approach

1. should contribute to a coordinated process of regeneration that responds positively to the unique context and characteristics of the area. Proposals here must have regard to the Edmonton Vision – and assist with delivery of key objectives set out here.

### Diverse and vibrant mix of uses

2. should assist with revitalising the high street and its role as an important district centre. Proposals which provide new spaces for small business, culture and community uses will be encouraged. Proposals in close proximity to the high street must also explore opportunities to provide non-residential spaces for community uses.
3. must contribute to creating a thriving mixed-use place offering a range of housing typologies, which may include dense forms of residential development. Development along the high street should

reinforce and create a coherent route along Fore Street. Proposals elsewhere must respect the predominantly lower-rise character of the area. Tall buildings will only be accepted in appropriate locations as set out in **Policy DM DE6 Tall buildings and Figure 7.4** (and any updating successor).

4. could provide employment uses that contribute towards the creation of a wide range of new jobs. Provision of affordable workspace and creative studios in this area that support entrepreneurship will be encouraged.
5. should demonstrate how they have facilitated enhancements to the fabric and setting of the historic environment. This includes the Fore Street conservation areas.

### Green infrastructure

6. must contribute to improvements to the blue and green infrastructure network through linkages to surrounding green spaces and waterways. Access to Pymmes Park should be improved with better security, access arrangement and play space. Contributions will be sought

towards this. Enhanced connections to Bull Lane playing fields should also be delivered.

7. should contribute to Sustainable Urban Drainage enhancements in the wider neighbourhood as part of an overall action plan. Opportunities to de-culvert Pymmes Brook, where present should be explored.

### Enhanced movement and connectivity

8. must contribute towards and/or facilitate improving connections between Silver Street Station and Fore Street including markers for intuitive wayfinding, a variety of public realm spaces which are pedestrian and cycle friendly integrated with existing street and movement patterns.
9. must contribute towards delivering improvements to the walking and cycling environment through the implementation of cycleways and enhancing the pedestrian environment to encourage uptake of active travel. New cycle and green routes east and west from North Middlesex University Hospital to Meridian Water will be supported.
10. must contribute to improving the crossing



facilities and arrangements of the North Circular Road to prioritise active travel and to better connect both sides of the road. Any proposals affecting the North Circular Road should be the subject of early discussion with TfL as highway authority to establish feasibility and likely costs.

11. should reduce the reliance on on-street and surface car parks, working towards car-free development in line with public transport improvements.
12. must contribute to improvements to the environment along the North Circular Road through tree planting, wild meadows and other public realm works and appropriately scaled development that directly addresses the road, while protecting the health and wellbeing of intended occupants.

### Social and community Infrastructure

13. should contribute towards funding a study to explore opportunities to provide a new integrated health and wellbeing centre led by the Integrated Care Board and the North Middlesex University Hospital Trust.

### EXPLANATION

- 3.55 The district centre's functionality and success should be maintained while simultaneously diversifying and improving its offerings. This includes encouraging a wider range of uses along the high street including community and cultural offerings to enliven the high-street and attract a more diverse range of visitors, all of whom can benefit from its offerings. Introducing some workspace provision, such as a mix of affordable workspace and creative studios, can further contribute to the vitality of the high street.
- 3.56 The Angel Edmonton area has a burgeoning creative and entrepreneurial ethos and any proposals should capitalise on this spirit to foster the growth of this sector, building upon recent initiatives such as the new affordable workspaces at Angel Yard, which will also support broader access to local employment opportunities.
- 3.57 Given the presence of large housing estates planned for renewal, the area possesses the capacity to deliver a substantial number of new homes. The housing mix introduced in this area should seek to serve local need and

complement the existing housing mix and comply with housing policies set out in Chapter 8.

- 3.58 Alongside this, there is a high likelihood of a significant uplift in proposed heights and densities. To maximise the opportunity for growth, well-designed taller buildings situated in the right locations could be acceptable. This stems from the presence of existing tall buildings, the mixed-use nature of the high street, and its strategic location on Fore Street, which serves as a main route linking other important destinations. Furthermore, considering the proximity of the railway station, this location is considered to be an appropriate location for the inclusion of some tall buildings to help with the delivery of housing.
- 3.59 The scale of growth that is estimated to come forward within this placemaking area would be an estimated 1,760 homes in the plan period. This is comprised of five site allocations:
  - SA4.1: Joyce Avenue and Snells Park Estate
  - SA4.2: Upton and Raynham Road

- SA4.3: Langhedge Lane Industrial Estate
- SA4.4: South-east corner of North Middlesex University Hospital Trust
- SA4.5: Public House, 50-56 Fore Street

3.63 The combined factors of high levels of deprivation and the specific demographics of the area have led to poor health outcomes for many residents. Improving connectivity to open space and promoting active travel can assist in fostering healthier lifestyles. This effort must be supported by ensuring that residents have adequate access to healthcare facilities, including those with out-of-hours access. NHS HUDU highlighted the desire to create a new integrated health and wellbeing facility in this area and all development coming forward in the area should contribute towards this. Plans to transform the Selby Centre into a brand new 'urban village' with state-of-the art sport, and community facilities and enhanced park, which will also support improving local health outcomes.

3.60 Currently, Angel Edmonton experiences relatively high crime and anti-social behaviour. To tackle these issues, development should focus on good design principles that encourage passive street surveillance and reduce opportunities for crime in line with NPPF paragraphs 96(b) and 135(f).

3.61 Access to surrounding green spaces and waterways is poor, and it is essential that development contributes to improving these connections, thereby maximising the potential of these assets to enhancing people's quality of life. The Pymmes Brook, is a hidden asset that has potential to contribute to the area's vision for placemaking vision and should be seamlessly integrated and enhanced.

3.62 In general, there is great scope for improving the overall quality of the public realm to improve the pedestrian experience, thereby making walking the preferred choice of travel.

## PL5 MERIDIAN WATER

### Context and Characteristics

3.64 Meridian Water occupies the south-eastern corner of the Borough. It is the Council's flagship regeneration project, plans for which have been underway for a number of years. The first residents moved into the first new homes in 2023. The area is characterised by its under-utilised industrial and retail properties. Situated immediately south of the North Circular Road, it is nestled between the neighbourhoods of Edmonton, Tottenham, and Walthamstow in North London. Its close proximity to the North Circular Road provides it with good road connectivity, not only within London but also to destinations further afield. Whilst the strategic road network is a key factor behind the success of the industrial and retail land uses, the roads also divide the area, reducing connectivity and accessibility, thereby creating navigational challenges. Significant portions of land, including two former gasholder sites, remain inaccessible further contributing to the division. The presence of electricity pylons and the North Circular Road flyover dominates the area's visual landscape.

3.65 The existing character of Meridian Water is predominantly shaped by its industrial heritage. It is nestled within the extensive green expanse of the Lee Valley, and it features several captivating yet currently underutilised waterways, including the River Lee, the Lee River Navigation, Pymmes Brook and Salmons Brook.

3.66 In the summer of 2019, the new Meridian Water railway station opened replacing the former Angel Road station. It is expected that approximately four million people will utilise this station each year, offering step-free access to Meridian Way and providing a publicly accessible connection across the railway from east to west. This area presently accommodates significant large-scale retail outlets and serves as a prominent employment hub. Its eastern boundary abuts the waterways and open spaces of the Lee Valley Regional Park, presenting opportunities for enhanced recreational facilities at Banbury Reservoir by working closely with the London Boroughs of Haringey and Waltham Forest as well as the Lee Valley Regional Park Authority.



Meridian Water

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## MERIDIAN WATER PLACEMAKING VISION

**Meridian Water** Meridian Water will be transformed into a highly sustainable mixed-use community. It will set the standard for sustainable neighbourhoods boasting exceptional environmental credentials and embodying a commitment to carbon positivity, environmental excellence and zero waste principles. This vibrant neighbourhood will offer new homes, including affordable housing and employment opportunities that are well served by community infrastructure. Its distinctive character will be drawn from its rich industrial and ecological heritage.

Pymmes Brook and the River Lee Navigation waterways will form the backbone of the new neighbourhood, establishing a network of public walkways that connect with newly created parklands and existing open spaces such as Kenninghall Open Space. These interconnected spaces will seamlessly integrate into the rich surrounding blue and green networks enhancing access to and providing striking views towards the Lee Valley Regional Park.

Meridian Water will enable opportunities to lead active, healthy lifestyles through the development of pedestrian friendly streets and cycle routes. Enhanced public transport, including improved bus services and the introduction of a new train station, will offer residents seamless mobility and accessibility.

Furthermore, Meridian Water is committed to fostering a culture of innovation and industry, adapting to contemporary demands by providing significant job opportunities on a transformative scale. The area will attract a diverse range of major employers, start-ups and meanwhile uses therefore cultivating a thriving economy for innovators and creators alike.

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## Meridian Water

### Site Allocations

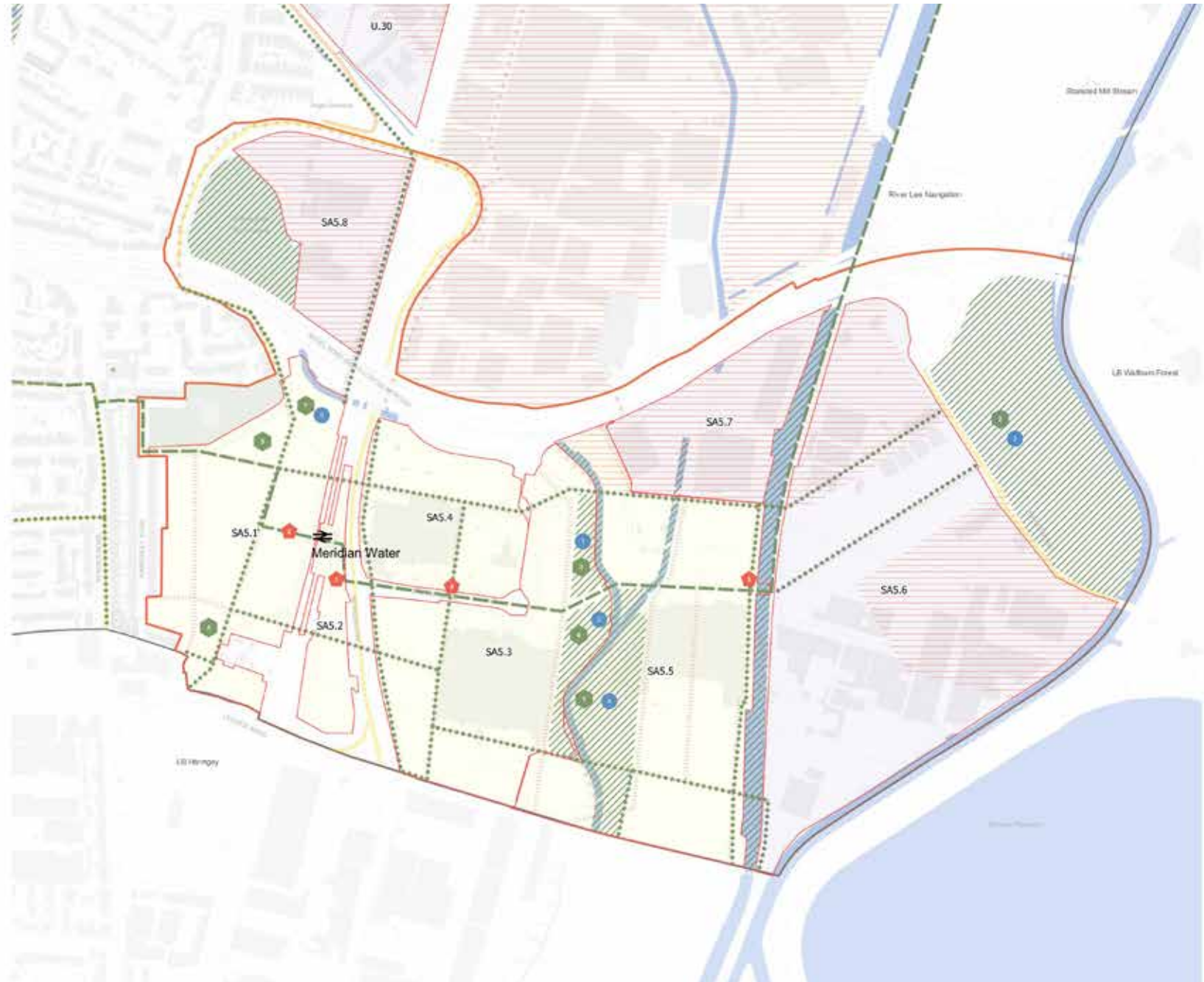
- Mixed Use
- Industrial

### Placemaking Opportunities

- Place Making Area Boundary
- ★ New Public Realm Opportunities
- ★ New Open Space Opportunities
- ★ New Wetlands Opportunities
- Entfield Green Loop
- New Green Links
- New Walking Route
- Enhancements to Existing Walking Routes
- Blue and Green Space Improvements
- Streetscape Improvements

### Existing Features

- ≡ National Rail Station
- Locally Listed Heritage Assets
- Local Centre
- Cycle Routes
- Water
- Local Open Space
- Borough Boundary



Note: Refer to table PLO5 for details

N 0 50 100 m

Figure 3.6: Meridian Water Placemaking Plan

## STRATEGIC POLICY

# PL5: MERIDIAN WATER

To realise the place vision set out in **Figure 3.6**, development proposals in Meridian Water:

### Comprehensively planned approach

1. must deliver comprehensive, residential-led mixed-use development that optimises the site's potential. To ensure that development in the Meridian Water placemaking area comes forward in a strategic and comprehensive manner, planning permission for individual phases must conform with a masterplan for the whole placemaking area that is supported by the Council.

### Diverse and vibrant mix of uses

2. should facilitate creation of a new large local centre for the Borough in line with **Table 10.1: Hierarchy of Town Centres**. This will be supported by a wide range of complementary uses. Retail uses will be strongly encouraged fronting on to the Central Spine (Glover Drive/Main Street), around the station and in adjoining public squares; and fronting on to the River Lee Valley Navigation. This should be connected to a variety of public realm spaces including

pocket gardens and squares, which are pedestrian friendly. Development within the new local centre must also create new space for small businesses, indoor leisure, culture and community uses.

3. should seek to deliver office floorspace within the town centre, including as part of mixed use developments. The provision of flexible, co-working and maker spaces as part of a diverse employment offer will be welcomed.
4. should maximise the potential for industrial development at the Northern Band, including through the development of innovative multilevel formats.
5. should actively explore delivering a range of alternative housing products to increase the quantum and pace of delivery. The Council will support appropriate and high quality 'build to rent' schemes as an element of the provision of private housing in line with Policy H7: Build to Rent. The need for co-living, older person's accommodation and student accommodation should also be explored.

### Green Infrastructure

6. must deliver a sufficient quantum of high-quality, multifunctional open space to support dense development, through the provision of a network of green corridors and public open spaces. Development proposals should deliver, facilitate, or contribute to the delivery of:
  - a. Brooks Park, including its westward extension
  - b. Green Loop
  - c. Lee Navigation Linear Open Space
  - d. Node located at the confluence of Pymmes and Salmons Brooks.
7. should incorporate spaces designed for a variety of physical activities to take place. Each phase of development must meet the 30% of the area delivered as open public space target as a minimum and seek to deliver the maximum open space possible. Where this is not possible acceptable justification should be provided.
8. should maximise the experience, activation and ecological potential of the existing waterways through naturalisation

and ecological enhancements.

Development should contribute towards river restoration works, including naturalisation of the riverbanks and off-site flood attenuation basins/conveyance channels to divert surface water run-off where this cannot be delivered on site.

9. should deliver a net gain in biodiversity in line with **Policy BG3**. Planting must be consistent with the habitats and character of the Lee Valley Regional Park and must be composed of a diverse range of native species in accordance with the Lee Valley Biodiversity Action Plan (and any updating successor), whilst also ensuring species choice is resilient to climate change.
10. should deliver new open spaces on either side of the North Circular Road (A406), A1055 and roadside improvements (e.g. underpass treatment and bridges).
11. could explore opportunities for delivery of water sports facilities along the Lee Valley Navigation canal and at Banbury Reservoir (in partnership with the London boroughs of Haringey and Waltham Forest) which will be encouraged where it would not have an unacceptable level of harm to ecology and wildlife.
12. should deliver high quality, varied play

spaces, which reinforces the local character. This should be provided through a combination of designated and informal playable space that are supported by suitable infrastructure including supportive seating. Doorstep play must be provided within individual plots.

### Urban Design

13. should create development that is seamlessly woven into the surrounding context of a predominantly suburban low-rise character of the area, with an appropriate massing strategy that the planned transformation of the area will bring.

### Movement and Connectivity

14. must facilitate and contribute towards enhancement of the existing network of routes, in particular Leaside Road, Glover Drive and Angel Edmonton Road, all of which will provide primary connections. Development should also deliver new strategic connections from Meridian Water to key destinations (such as Edmonton Green, North Middlesex Hospital, Angel Edmonton, Picketts Lock to the north and Tottenham Marshes to the south) and neighbouring Boroughs (via the Lee Valley Regional Park) to

overcome physical severance and provide attractive and safe walking and cycling links.

15. must contribute to improving and enhancing physical infrastructure, including improvements to rail and bus provision, active travel, new routes across the site to improve accessibility and connectivity (e.g. east-west routes to Banbury Reservoir) and flood mitigation infrastructure. Developments should contribute to delivering sustainable transport connections to the Lee Valley given its importance as a north-south corridor and green space.
16. must provide a key route for essential infrastructure along primary routes. This may include high speed broadband, decentralised energy, gas and electricity networks and other infrastructure. Development proposals that include land within the central spine corridor must demonstrate how the central spine will act as the trunk route for servicing and subterranean infrastructure and show how the design will minimise disruption from future maintenance and road works.

### Infrastructure

17. must make a significant, positive

contribution to both physical and social infrastructure. This will include delivery of a new primary school and a new health centre as a minimum.

## Employment

18. should contribute towards generating a mix of high-quality permanent jobs, jobs through meanwhile uses, and construction jobs. No less than 25% will be from local labour. To deliver the permanent jobs, development should provide a mix of employment spaces in appropriate locations. Meanwhile uses, particularly those which contribute to the socio-economic and cultural vision for the placemaking area will be encouraged.

## Meridian Hinterlands

19. should deliver employment-led regeneration at Meridian Hinterlands in line with Policy E12 by:
  - a. delivering a net increase in employment floorspace through intensification and mixed use redevelopment.
  - b. consolidating SIL to deliver new homes and jobs and successfully manage interfaces to ensure that businesses can thrive.

## EXPLANATION

3.67 Meridian Water offers an immense opportunity for transformational change and is uniquely positioned as the gateway into the Lee Valley Regional Park. This expansive regeneration project aspires to set the highest standards in placemaking, and places sustainability at its heart. The scale of development envisaged will enable Meridian Water to define its own character and density, while ensuring the creation of high quality residential environments and public spaces. The Council has already been successful in securing substantial sums of funding from government in order to aid delivery of this expansive regeneration project.

3.68 To overcome existing constraints and unlock Meridian Water's growth potential, a comprehensive master-planned approach is imperative for the entire placemaking area, emphasising the creation of high quality places. Development here has the potential to establish an exciting new neighbourhood within the plan period and beyond. The longer-term goal is for the entire Meridian Water placemaking area to accommodate 10,000 homes and 6,000 permanent jobs, with an additional 1,000 jobs from meanwhile

uses and 1,000 jobs from construction over a span of 25 years. The quantum of development which could be attained in the placemaking area is dependent on a range of factors, not least public transport accessibility.

3.69 As the primary landowner, the Council has set ambitious targets for the establishment of a new local centre, new homes and employment opportunities across a broad range of industries. Proposals will evolve around a progressive approach to sustainability, emphasising low carbon, circular economy principles, biodiversity enhancement, revitalisation of waterways, and the creation of exceptional open spaces that connect the site to the Lee Valley Regional Park (LVRP) as a central focal point.

3.70 Directing some non-residential uses to specific locations within Meridian Water will help to shape the hierarchy of the new neighbourhood. Promoting a blend of retail, commercial and community activities will help to sustain a vibrant new centre. Given the challenges faced by traditional town centres and high streets, the development should encompass workspace, maker spaces, leisure facilities, civic functions, as well as retail food and beverage establishments to generate



activity and attract a diverse range of people, thereby supporting local businesses and the growing community. A diverse commercial offering will foster a dynamic urban centre at Meridian Water that is an attractive destination for the local community and visitors from further afield.

- 3.71 To make high-density accommodation acceptable in an area with limited access to green spaces, it is crucial to provide sufficient open spaces. The creation of parks, swales, canals and waterways will enhance the quality and unique character of Meridian Water.
- 3.72 The strategic placement of tall buildings in specific locations will ensure their impact is carefully managed and not widespread. The suitability of particular sites for additional height will be determined through detailed masterplanning work and subsequent local plan iterations. These taller structures will serve as landmarks aiding navigation, defining destinations, delineating key public areas and contributing to a varied urban landscape. Proposals for tall buildings will need to comply with the relevant policies.
- 3.73 Appropriately located sports facilities

can provide invaluable social space for the entire community promoting engagement in sport and physical activities, while fostering social cohesion. They can also mitigate antisocial behaviour, reduce crime rates and enhance the urban environment.

- 3.74 To establish a new modern neighbourhood, it is essential to seamlessly integrate smart and digital technologies, enabling residents to thrive, stimulating the local economy, improving everyday experiences and enhancing resource efficiency.
- 3.75 The scale of growth that is estimated to come forward within this placemaking area would be an estimated 6,711 homes in the plan period. This is comprised of eight site allocations:
- SA5.1: Meridian Water Phase 1
  - SA5.2: Meridian Water Phase 2
  - SA5.3: Former IKEA, Meridian Water
  - SA5.4: Tesco Extra, Meridian Water
  - SA5.5: Meridian 13
  - SA5.6: Meridian East
  - SA5.7: Ravenside Retail Park
  - SA5.8: Kenninghall Metals and Waste



Meridian Water station, entrance

## PL6 SOUTHGATE

### Context and Characteristics

3.76 Southgate is one of the Borough's four district centres, situated in the south-western part of the Borough close to the boundary with the London Borough of Barnet. Consequently, a significant proportion of its catchment extends into Barnet as well as Enfield. The area boasts a mix of uses with a retail centre as well as some larger office buildings and a leisure centre. Southgate district centre is well performing with one of the highest levels of occupancies in the Borough.

3.77 The area's character is closely associated with the development of the Piccadilly line in the early twentieth century. However, the streetscape lacks greenery and civic spaces. The area is centred around the tube station which is on the Piccadilly tube line. The tube station offers frequent connections into central London, which is a major asset to the area, with frequent bus services providing good local connectivity within the Borough as well as to neighbouring Barnet and out to Hertfordshire. The area does not have strong cycle connectivity, with just an early stage proposal for a walking and cycling route connecting Southgate

Circus to the Great Cambridge Road junction, which does not yet have funding allocated to it. Both the tube and bus stations are listed, offering a very distinctive, strong focal point within the area. The surrounding residential areas predominately feature suburban housing.

3.78 Grovelands Park is the nearest large green space, which has been described as 'the jewel in the crown' of parks in Enfield. It was opened in 1913. It offers a valuable and enticing asset to complement the nearby Town Centre – just 5 minutes away by foot, as well as providing a well-loved amenity for surrounding residents.

3.79 The area benefits from various important social infrastructure, including the large Barnet and Southgate college campus as well as adjacent library.

### SOUTHGATE PLACEMAKING VISION

**Southgate will be a thriving district centre, characterised by its unique identity derived from the listed tube station building and other heritage assets. It will serve as a vibrant community and cultural hub, building on its strong transportation connections. The presence of Barnet and Southgate College will increase, playing a pivotal role as an anchor in the area. Away from the high street the area will maintain a residential character.**

**The distinctive quality of parks and open spaces, such as the nearby Grovelands Park and Minchenden Oak Garden, will be sustained and enhanced with improved accessibility for all users.**

**Southgate's existing and newly developed clusters of small to medium office spaces will take advantage of good links to central London, evolving into a well established cluster, making use of underused or vacant shop units and consolidating existing office use to create higher quality modern office environments. Southgate will thrive where history meets innovation and the community flourishes.**

## Southgate

### Site Allocations












-  Housing
-  Mixed Use

### Placemaking Opportunities

-  Place Making Area Boundary
-  New Public Realm Opportunities
-  Public Realm Enhancement Opportunities
-  New Open Space Opportunities
-  Infill Opportunities
-  Enhanced Access to Blue and Green Space

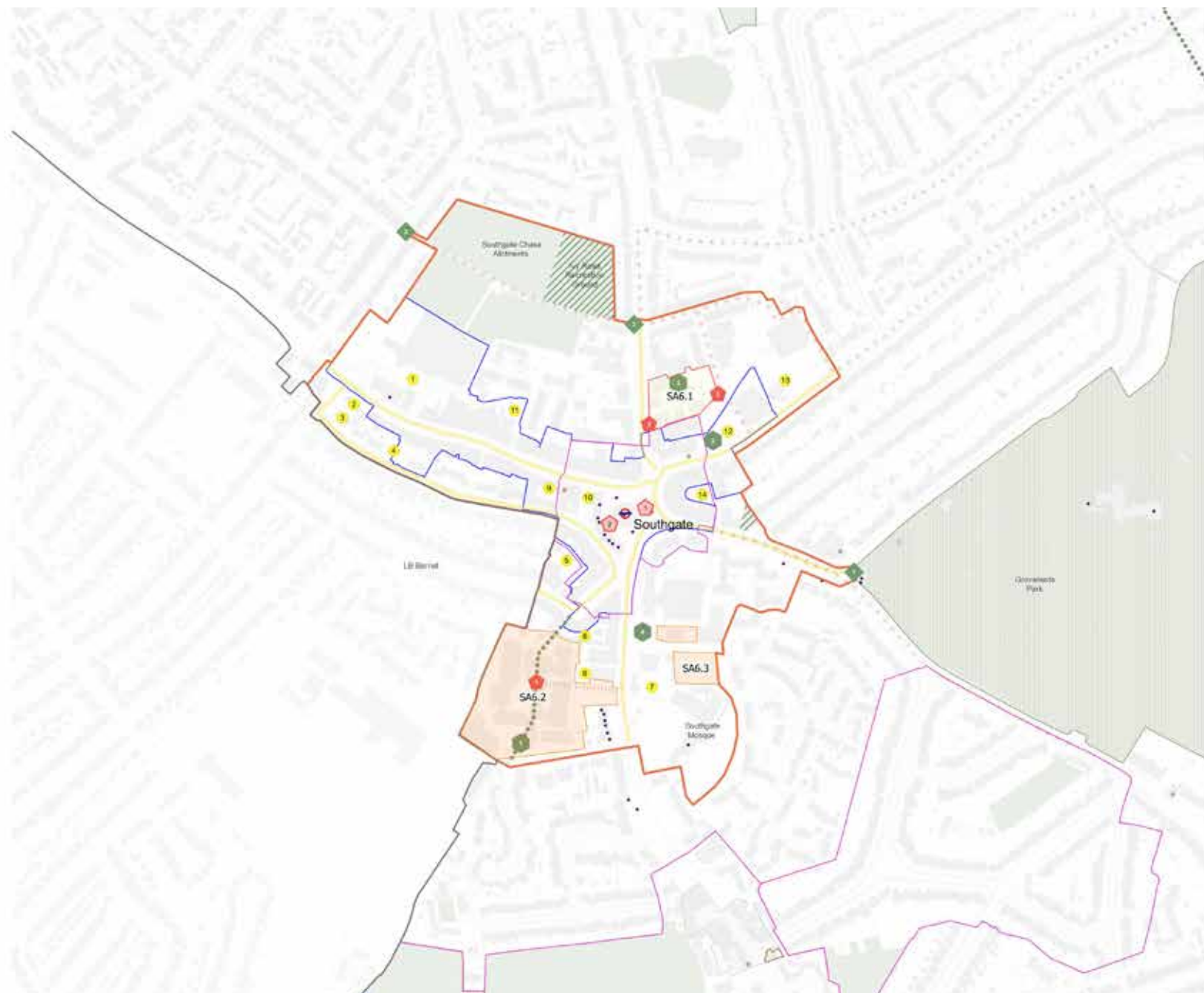
- \*\*\* New Green Links
- New Walking Route
- Enhancements to Existing Walking Routes
- /// Blue and Green Space Improvements
- Streetscape Improvements

### Existing Features

-  Underground Station  
 Conservation Area  
 Locally Listed Heritage Assets  
 Listed Buildings  
 District Centre  
 Local Centre  
 Metropolitan Open Land  
 Registered Parks and Gardens  
 Water  
 Metropolitan Open Land  
 Local Open Space  
 Borough Boundary

Note. Refer to table PLOS for details.

N      O      50      100 m



**Figure 3.7: Southgate Placemaking Plan**



## STRATEGIC POLICY

# PL6: SOUTHGATE

To realise the place vision set out in **Figure 3.7**, development proposals in Southgate:

1. must contribute to a coordinating process of town centre renewal that responds positively to the unique context and characteristics. The Council will explore the need for preparing a coordinating plan, which could be adopted as a Supplementary Planning Document (SPD), to support the delivery of the placemaking vision for Southgate. Development in this area must be brought forward in accordance with the guidance that is brought forward or any subsequent planning mechanism.
2. should deliver new homes including through high density development that preserves key views of the station. This may include tall buildings only in acceptable locations as identified in **Policy DM DE6 Tall buildings and Figure 7.4** (or its subsequent update).
3. should be shaped by the distinctive character and heritage in the area, having particular regard to:
  - a. the Grade II\* listed tube station of outstanding national significance and its surroundings;
  - b. interwar shopping parades;
  - c. historic high streets;
  - d. distinctive suburban housing; and
  - e. a concentration of office buildings around the district centre.
4. should provide an intensified district centre by supporting proposals for small creative businesses and business start-ups, encouraging meanwhile and temporary use of vacant shop units and small office spaces around the high street to foster growth and sustain employment.
5. should explore opportunities to enhance community and cultural facilities including facilities such as Barnet and Southgate college, Durants school and Southgate mosque.
6. should support a growing evening economy. Change of use of sites to non-town centre uses, particularly at the ground floor will not normally be permitted unless appropriate evidence can be provided to demonstrate why this is acceptable.
7. should create an improved sense of place by the station acting as a multi-modal hub. The Council will work in partnership with key stakeholders (including TfL) and landowners to devise a cohesive public realm strategy, which also sets out a strategy of improvements to cycling infrastructure. This will include reviewing transport infrastructure and junctions around the historic tube station. The strategy will be focussed around the station to improve the sense of arrival and around the shopping parades to create a more pedestrian friendly environment. Development proposals and changes to traffic circulation must safeguard the continued operation of the bus station with no loss of efficiency or overall capacity.
8. must contribute towards enhancing the pedestrian environment and reduce the reliance on surface car parks, working towards car-free development.
9. should enhance and improve access to distinctive parks and open spaces in the vicinity including but not limited to: Grovelands Park, Minchenden Oak Garden, Oakwood, and Ivy Road Recreation.



10. could deliver small scale housing through intensification of underutilised brownfield sites such as garages and car parking forecourts, identified as ‘intensification opportunities’ on the key diagram.
11. should explore the opportunity to integrate public art into proposals or to contribute towards these. As a home to a local college and a high concentration of primary schools in the area there is a unique opportunity for the Council to collaborate on community projects with schools.

## EXPLANATION

- 3.80 While Southgate serves as a district centre with potential for increased densities and building heights, it is imperative to strike a balance with the need for proposals to sensitively consider the historic environment surrounding the listed station building. The heritage value of this locale plays a pivotal role in defining the place and therefore all developments that come forward in the area must make a positive contribution to this heritage value to avoid detracting from the place’s overall quality.
- 3.81 Southgate presents an opportunity for

enhancing the vitality of the high street including the evening economy as well as improving access to the public realm including connectivity to nearby green spaces. The district centre also acts as a good office location, and this will be enhanced – recognising the crucial role office floorspace can play in sustaining healthy high streets in the daytime as well. To boost the vibrancy of the centre, the Council will explore opportunities to improve the car dominated nature of the area around the station. The presence of the frequently served tube station offers an opportunity to increase densities in the area to deliver additional residential accommodation (given the PTAL up to 6 – the highest rating). The appropriateness of siting of proposed tall buildings will be assessed taking into consideration the findings of the Borough’s Character of Growth Study (or its subsequent updates) and its impacts on heritage assets. Proposals will also need to comply with relevant Local Plan and London Plan policies in relation to Tall Buildings.

- 3.82 There are several large surface level car parks associated with supermarkets, presenting an opportunity for intensifying land use. The introduction of additional employment and housing opportunities will support the vitality of the non-residential uses thereby bolstering this centre’s resilience.

- 3.83 The scale of growth that is estimated to come forward within this placemaking area would be an estimated 249 homes in the plan period. This is comprised of three site allocations:

- SA6.1: Southgate Office Village
- SA6.2: Barnet and Southgate College
- SA6.3: Minchenden Car Park and Alan Pullinger Centre

- 3.84 It is also acknowledged there could be scope for other key sites such as the ASDA supermarket and M&S site to come forward for redevelopment within the plan period, if shifting retail patterns impact these supermarkets. The Council will work positively and proactively with promoters to shape any opportunities that may arise here in the future.

- 3.85 To promote active travel and improve the use of public transport, it is essential to improve the pedestrian environment around the tube and bus station. This effort will also help to support the vitality of the district centre. In addition to the area immediately surrounding the station, there are opportunities to improve the crossing across the railway from Southgate Office Village to the M&S store.

- 3.86 Enhancing connectivity to the surrounding green spaces offers an opportunity to capitalise on these assets for mutual benefit with the town centre uses, as well as providing enhanced habitats for flora and fauna.

# PL7 NEW SOUTHGATE

## Context and Characteristics

3.87 New Southgate is situated in the southwestern part of Enfield, bordering the London Boroughs of Haringey to the south and Barnet to the west. As such it occupies a strategic location marking the entrance to the south-western part of the Borough. The area presents a mix of residential and industrial land, which include the New Southgate Industrial Estate, the distinctive gasholder, the Builders Depot (recognisable by its elevated blue building) and Travis Perkins. Local shopping parades can be found at Arnos Grove and New Southgate (Friern Barnet Road), designated as local centres. Arnos Grove underground station, served by the Piccadilly Line and New Southgate rail station are conveniently located in the area, offering good access to central London. The area has limited dedicated cycling routes or infrastructure and is not an inviting environment for less confident cyclists. However, there are emerging proposals for a planned route towards Palmers Green which have yet to secure funding to be developed further.

3.88 The presence of the North Circular Road creates a barrier to movement in the southern part of the area. The southern section of the Ladderswood estate and the Western Gateway site accommodates buildings of poor quality. In certain areas, the neighbourhood's appeal is enriched by Victorian architecture and traditional street patterns. Nevertheless, connectivity between key points like Bowes Road library and New Southgate Station, as well as their connection to the broader New Southgate area, leaves room for improvement.

3.89 Although the area boasts some valuable small open green spaces such as Millennium Green, High Road Open Space and Grove Road Open Space, they remain underused and would benefit from improvements to make them feel safer and more attractive for residents. A number of larger parks such as Arnos Park in the North and Hollickwood Park (in Haringey) and Friern Bridge open space to the south (in Barnet) are close to the boundary of the area, but are disconnected by major road/rail infrastructure.

## NEW SOUTHGATE PLACEMAKING VISION

**New Southgate will become a new enhanced gateway to the Borough, boasting connections to Enfield and adjacent neighbourhoods in adjoining boroughs. The area will have enhanced connectivity with the surroundings by foot, with improved connections provided over existing road and rail barriers. It will offer an exemplary quality development on its western edge with housing alongside modern commercial space and enhanced community facilities. Throughout the neighbourhood, a network of connected pocket parks will be interspersed around the area, ensuring that green spaces punctuate and permeate the neighbourhood, with improved access to the larger green spaces on the area's boundaries. The shopping areas at New Southgate and Arnos Grove stations will undergo revitalisation, welcoming new developments and creating more attractive shopping and station environments.**

## New Southgate

### Site Allocations

- Housing
- Mixed Use

### Placemaking Opportunities

- ▬ Place Making Area Boundary
- ★ New Public Realm Opportunities
- ★ Public Realm Enhancement Opportunities
- ★ New Open Space Opportunities
- ★ Infill Opportunities
- ◆ Enhanced Access to Blue and Green Space
- New Wetlands Opportunities
- ▲ New Rain Gardens Opportunities
- Railway Arches Opportunities
- Enfield Green Loop
- New Green Links
- New Walking Route
- Enhancements to Existing Walking Routes
- / Development to Create Active Frontage
- / Blue and Green Space Improvements
- New Green Buffer
- Streetscape Improvements

### Existing Features

- ≡ National Rail Station
- ⊕ Underground Station
- Locally Listed Heritage Assets
- Listed Buildings
- Local Centre
- Locally Significant Industrial Site
- Metropolitan Open Land
- Water
- Metropolitan Open Land
- Local Open Space
- Borough Boundary

Note: Refer to table PL07 for details

N 0 50 100 m



Figure 3.8: New Southgate Placemaking Plan

## STRATEGIC POLICY

# PL7: NEW SOUTHGATE

To realise the place vision set out in **Figure 3.8**, development in New Southgate must:

1. deliver a comprehensive, masterplanned approach, in particular around the western gateway sites (former Gasholder, Topps Tiles and Aldi), to ensure an appropriate distribution of green and open spaces, non-residential uses and height and density and achieve an improved relationship to the North Circular Road. Given the areas location on the Borough boundary there is a need for cross-boundary cooperation. This could enable potential for a joint area planning framework to be realised. Proposals should also consider consistency with Barnet's local plan policy GSS09.
2. the Council may use planning tools, including preparation of masterplans, design codes, sustainable place making strategies to support the delivery of this policy. Development in this area must be brought forward in accordance with any such guidance for this area.
3. must demonstrate how individual proposals will contribute to the vision of the wider area including how placement of tall buildings aids with legibility and how proposed heights will relate appropriately to future surrounding development.
4. should create a thriving mixed-use place including dense forms of residential development offering a range of housing typologies. Tall buildings in selected locations where buildings can act as key markers will be supported in line with Policy DM DE6 on Tall buildings and Figure 7.4 (and any updating successors).
5. must positively address the main North Circular Road and, in order to mitigate against poor air quality and noise pollution associated with this heavily trafficked route, the internal planning of new development should position living and sleeping accommodation away from the most polluted side of the development. Housing design should encourage natural ventilation so that cleaner air is drawn in the building from the less polluted side. Landscape and biodiversity proposals will also play an important role in the mitigation of pollution.
6. should contribute towards improving links along key routes to the train and tube station such as Palmers Road, High Road and Station Road. The potential for the creation of active routes will be explored. Contribution towards improvements to the public realm and townscape particularly along the large roads bounding the area (i.e. Bowes road, A406 and Station Road) will be sought.
7. should contribute towards delivering improvements to community facilities. Improvements to shops and other services will also be encouraged. These should be focused around a new hub of facilities around Grove Road open space. Arnos Pool and Bowes Road Library have been identified as facilities which could be improved, subject to funding. Proposals which facilitate this will be supported.
8. should contribute towards enhance existing local open spaces as well as towards river restoration projects within Arnos Park. Improvements in parks should include enhanced lighting and seating, as well as improved play opportunities for all ages. A new play park for young children will be supported in High Road open space.
9. should contribute to enhancing the public realm to make walking and cycling



significantly more accessible, safer and attractive environment. Development will be expected to contribute towards improvements to enhancing the public realm around New Southgate and Arnos Grove station as well as in the local centres.

10. enhance the environment around the railway arches through regeneration. Such proposals will be supported.

## EXPLANATION

- 3.90 Opportunities for large scale development in this area are limited. Nevertheless, where such opportunities exist, developers must bring forward development in a coordinated manner to ensure that the full potential of the sites here can be fulfilled. Optimising development potential may include tall buildings, with their appropriate locations being informed by the character of growth study or its subsequent update and identified in the **Figure 3.8**. All proposals for tall buildings will have to also comply with relevant Local Plan and London Plan policies.
- 3.91 The area is notably deficient in essential community facilities, meaning one of the key benefits to be secured from

growth will be improvement to the facilities benefiting both existing and new residents.

- 3.92 Vehicular traffic dominates the area, particularly along the A406 (North Circular Road) and improvements to public realm are needed to mitigate these effects. Furthermore, the area lacks adequate connectivity to large green spaces. Therefore, enhancing the smaller local open spaces within the area, along with Arnos Grove Park to the north of the area, and those beyond the Borough boundary to the south and west will become imperative to improve the quality of life for residents.
- 3.93 Given the area's location on the Borough boundary, fostering cross-boundary cooperation will be essential. Enfield Council already has worked in collaboration with Barnet to prepare the 'making the case for good growth' report, which has enabled the boroughs to secure further funding to develop the work further. This work is ongoing and planned to be completed by 2025.
- 3.94 The scale of growth that is estimated to come forward within this placemaking area would be an estimated 699 homes in the plan period. This is comprised of five site allocations:
  - SA7.1: Former Gasholder, New Southgate

- SA7.2: Aldi, New Southgate (Formerly Homebase)
- SA7.3: Ladderswood Estate
- SA7.4: Arnos Grove Station Car Park
- SA7.5: Coppice Wood Lodge.



Southgate fingerpost

# PL8 PALMERS GREEN

## Context and Characteristics

- 3.95 Palmers Green is located in the southern part of the Borough and serves as one of the four district centres. Its high street features twentieth century parades, and the urban centre is located at the junction between Green Lanes and Aldermans Hill. The area is surrounded by classic suburban and urban terraces.
- 3.96 To the north, Green Lanes extends toward Enfield Town, the Borough's major town centre. The development gradually intensifies as it approaches Enfield Town, visible in the more urban nature of the town centre, with a strong mixture of uses and greater density of activity.
- 3.97 The eastern part of this area is primarily comprised of residential neighbourhoods. The effective eastern boundary of the area is the curve of the New River which wraps around the eastern and southern sides of Palmers Green and effectively breaks the urban form a short distance north of the North Circular. Constructed in the seventeenth century to supply London with drinking water from Hertfordshire, the New River is an important landscape resource of

considerable heritage significance. It is widely accepted as one of the most significant and ambitious developments in water supply in England.

- 3.98 On the western side lies Broomfield Park, a Grade II Registered Park and Garden. At its core lies Broomfield House together with its associated Stable Block and Walled Garden, (which are Grade II and II\* listed). Broomfield house, the stable block and Registered Park and Garden, are all listed on Historic England's Heritage at Risk Register. While the garden is available for public enjoyment as a park, the house remains inaccessible due to extensive fire damage.
- 3.99 The area has two watercourses weaving through it - Pymmes Brook and the New River which are towards the south and east.
- 3.100 An experimental low traffic neighbourhood was also introduced (Fox Lane) during the Covid-19 pandemic, with the aim of reducing traffic congestion on local roads, and promoting active travel. However, this initiative has sparked controversy and undergone adjustments to ensure that the proposals are inclusive.

- 3.101 At the southern end of the area, several notable community facilities are located. Palmers Green Library, situated across from Broomfield Lane, is one of the Borough's flagship libraries. It re-opened after refurbishment in 2015 integrating a range of technologies and designed to suit users of all age groups. To the southeast, on Oakthorpe Road, Palmers Green Mosque and the adjacent community centre known as the Darji Pavilion were constructed in the early 2000s in a corner of Oakthorpe Sports Ground. Across from this is St. Anne's High School for girls, which houses its upper school and contains its sixth form centre. The Lower school is currently situated in Enfield Town.
- 3.102 Palmers Green is particularly well connected, benefiting from a well-served railway station with links to Finsbury Park and Moorgate stations in inner London. Green Lanes, which runs through the heart of the area connects the area to Haringey to the south and Enfield Town to the north. This route is serviced by frequent bus services, promoting sustainable travel patterns. Additionally, the C20 cycleway runs alongside Green Lanes.
- 3.103 This ward has the highest proportion of

‘other white’ residents in the Borough, primarily comprised of people of Turkish or Greek descent. A notable range of facilities and retailers serve this community. Some parts of Green Lanes further south in Haringey attract visitors from a large catchment to the numerous restaurants offering Turkish and Greek cuisines. There is an opportunity for Palmers Green to play a similar role.

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### **PALMERS GREEN PLACEMAKING VISION**

**Palmers Green will continue to be a vibrant centre with a unique offering. It will mix traditional retail with unique food and beverage outlets, all in close proximity to a range of much valued community facilities and green spaces including Broomfield Park. New developments will be strategically located around the district centre and station, reinforcing its place at the heart of the community. Flexible workspaces will support a range of micro and small business, including those within the growing knowledge and creative industries, which will offer synergies with spaces for cultural activity. The positive contribution of twentieth century parades to local character and distinctiveness will be enhanced. There will be improved connectivity to Broomfield Park, (which is aspired to be removed from the the Heritage at Risk register). Access to and the cultural significance of the New River and Pymmes Brook will be enhanced and new trails will help to improve east-west connectivity across the area.**

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## Palmers Green

### Site Allocations

- Housing
- Mixed Use

### Placemaking Opportunities

- Place Making Area Boundary
- Public Realm Enhancement Opportunities
- New Open Space Opportunities
- Infill Opportunities
- Enhanced Access to Blue and Green Space
- New Rain Gardens Opportunities
- Enfield Green Loop
- New Green Links
- New Walking Route
- Enhancements to Existing Walking Routes
- Streetscape Improvements
- Blue and Green Space Improvements
- New Green Buffer

### Existing Features

- National Rail Station
- Conservation Area
- Registered Parks and Gardens
- Locally Listed Heritage Assets
- Listed Buildings
- District Centre
- Local Centre
- Cycle Routes
- Metropolitan Open Land
- Water
- Metropolitan Open Land
- Local Open Space



Note: Refer to table PLO8 for details

N 0 50 100 m

Figure 3.9: Palmers Green placemaking vision



## STRATEGIC POLICY

# PL8: PALMERS GREEN

To realise the place vision set out in **Figure 3.8**, development proposals in Palmers Green:

1. should contribute to the delivery of additional housing, including denser forms of development within walking distance of the station and town centre.
2. could encourage greater diversification of uses present along the high street. Where proposals encourage this in a way that will positively contribute to the vitality of the high street they will be encouraged. This could include affordable workspace.
3. should maintain distinctive shopfronts and open ground floor frontages where alternative uses are introduced to replace retail uses.
4. must contribute towards delivery of improvements to the public realm, public facilities and the enhancement of heritage assets and their settings. This includes the New River, Pymmes Brook and Broomfield Park and the associated heritage assets as well as various local greening projects.
5. should respect key views within Broomfield Park and reinforce the heritage value of twentieth century parades and their contribution to local character and distinctiveness.
6. should facilitate the aspiration to connect the Pymmes Brook Trail path back to the brook to connect people to the brook. This could include pedestrian connections from Arnos Park towards Broomfield school.
7. should contribute towards improving and enhancing cycling and pedestrian accessibility to support sustainable travel patterns. working in partnership with Network Rail, the Council will support improvements to the rail station, including the possibility to establish step-free access.

## EXPLANATION

- 3.104 As the centre evolves, any new developments should be designed to complement the valued characteristics of the place identified in the Character of Growth Study. The distinctive shopfronts and architecture are an essential component of this.
- 3.105 Palmers Green has a vibrant existing shopping centre and it is imperative to preserve its function and success while capitalising on the unique qualities it already offers. At the same time, the centre should consider diversification and improvements to its offering to build its resilience. This could include creation of new business spaces to support the knowledge and creative industries. Given its good access to public transport, the centre can accommodate additional development. Any such development must work to support the town centre uses and improve the quality of life of existing residents and workers by contributing to improved facilities and public realm.
- 3.106 Currently, the New River and Pymmes Brook remain largely hidden from view. Existing access routes are unpleasant and difficult to access. It is crucial that these waterways make a greater contribution to shaping the character and amenity opportunities of the placemaking area. The aspiration to reconnect Pymmes Brook Trail with the brook as an objective will require further detailed analysis and feasibility assessment, and any proposals should contribute towards facilitating its eventual delivery.
- 3.107 The station is a valuable asset in establishing a sustainable connection for the area. Given the significant number of families in the area, improving step-free access could unlock an opportunity for families, particularly those with pushchairs and prams. Such improvements could also benefit older residents with limited mobility and disabled individuals, as well as visitors to the area.
- 3.108 The scale of growth that is estimated to come forward within this placemaking area would be an estimated 468 homes in the plan period. This is comprised of four site allocations:
- SA8.1: Morrisons, Palmers Green
  - SA8.2: Lodge Drive Car Park
  - SA8.3: Corner of Green Lanes and the North Circular
  - SA8.4: Travis Perkins, Palmers Green

# PL9 RURAL ENFIELD

## Context and Characteristics

3.109 The northern part of the Borough serves as London's welcoming gateway, bridging the urban landscape of the city and the vast countryside of rural Hertfordshire. This region predominately boasts a spacious rural character, preserving remnants of its historical identity as a royal hunting ground, defined by field boundaries, extensive parklands once belonging to grand estates, and the presence of numerous parks and rural and semi-rural open spaces.

3.110 Enfield's rich heritage is intricately tied to its historic pathways connecting the city of London to the more rural counties to the north, as well as linking the east and west regions. The built environment across the Borough eloquently narrates these connections, tracing back to navigable waterways, expansive estates, and landscapes situated on the outskirts of a day's journey from the capital. This historical development extends to modest suburban surrounding tube stations. The Borough enjoys an abundance of north-south transport connections, facilitating travel in and out of London, and these routes have historically driven development in

the area. However, these north-south transport links have also inadvertently acted as physical barriers, contributing to the separation of east-west regions within the Borough.

3.111 The northern region boasts extensive areas of open space and water features bearing immense amenity, cultural, environmental, and heritage significance. Local waterways, such as Turkey and Salmons Brooks, contribute to this legacy. Furthermore, echoes of historical agricultural and market gardening practices resonate in the northwestern part of the Borough. This legacy endures through the preservation of agricultural uses and the presence of garden centres, significantly contributing to Enfield's provision of food-growing activities which exceed the regional average.



Sunset in Trent Park

## RURAL ENFIELD PLACEMAKING VISION

By 2041, the arc of open spaces and woodlands surrounding Enfield Chase and Lee Valley Regional Park will undergo a remarkable transformation, emerging as the leading outdoor countryside destination in North London and surrounding area. Situated in the rural northern region of Enfield, this area will serve as a unique and exemplar place.

In close proximity to the urban communities this area will offer a diverse tapestry of sustainable and easily accessible rural activities. These activities will encompass local food production, forestry initiatives, landscape restoration projects, eco-tourism ventures, sporting opportunities, natural burial grounds, countryside education, and recreational pursuits. This transformation will enhance the landscape, making it a haven for residents and visitors, granting access to wildlife-rich blue-green spaces, pristine clean air, locally sourced food production and world-class sporting facilities.

This endeavour will yield the most significant environmental and health benefits in London, fostering a sense of wellbeing and connectivity with nature. Active community participation and sustainable green enterprises will invigorate the local rural economy, resulting in substantial landscape enhancements job creation, increased investment, and a sense of renewal. Rural Enfield will weave its influence deep into the surrounding urban communities, fostering stronger connections to the countryside and integrating the beauty of nature into the heart of the urban fabric.



Broomfield Park tree planting day



## Emerging Enfield Chase - Landscape Recovery Vision 2023 - 2043

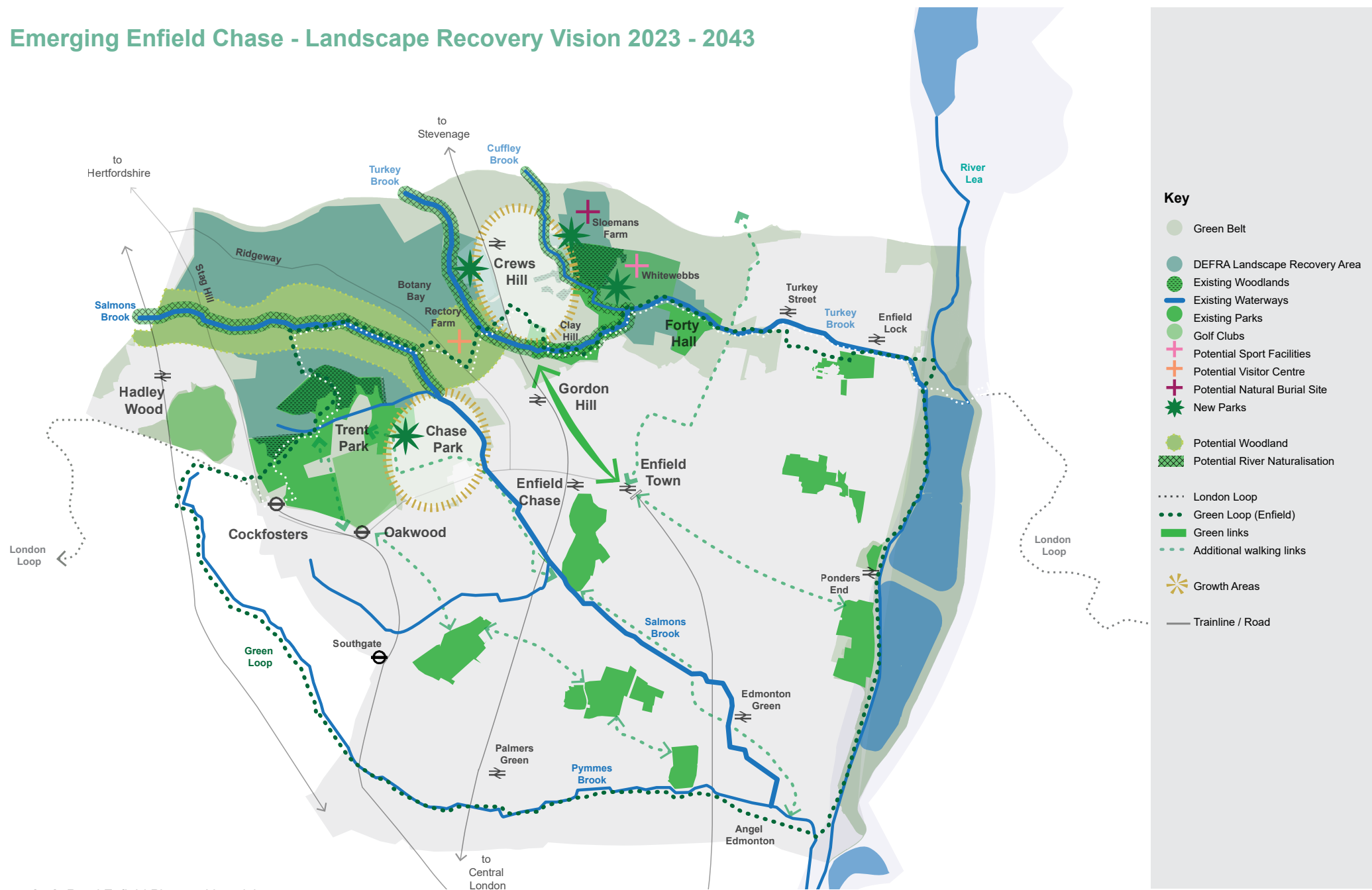


Figure 3.10: Rural Enfield Placemaking vision

## STRATEGIC POLICY

# PL9: RURAL ENFIELD

1. The open and historic character of rural Enfield (as shown on the Policies Map and key diagram) will be protected and enhanced in line with Green Belt and Metropolitan Open Land policies. The benefits of any new development must be considered to have a significant positive impact. New development should be designed to sensitively integrate physically and visually with Enfield Chase and the Lee Valley Regional Park, particularly in relation to open skylines, key entrance points, strategic views and valued landscapes.
2. The Council will support proposals which contribute positively to the delivery of the unique Rural Enfield destination within London where they do not conflict with policies in the NPPF. The Enfield Chase Landscape Recovery Area and Lee Valley Regional Park will be the key focus for these. The Enfield Chase Landscape Recovery is designated through the local plan as an area of focus for landscape restoration, biodiversity gain and nature recovery as defined in the Environment Act. The area is shown on the policies map. Proposals which will be supported to contribute to this objective include, but will not be limited to:
  - a. Enfield Chase landscape restoration programme – 1,000 ha of proposed woodland and open space as part of a major nature recovery network (RUR.07);
  - b. a new cultural gateway hub at Enfield Chase, including a new visitor centre (subject to compliance with part 1 of this policy) and public art installations, in the form of sculptures, in a parkland setting;
  - c. flood risk mitigation to reduce the impact of development downstream (including sustainable drainage systems and wetland creation);
  - d. new or improved active travel initiatives including walking and cycle routes between key railway stations, town centres and cultural attractions (e.g. Green Loop) and along watercourses (e.g. Lee Navigation and New River);
  - e. implementation of climate resilience measures;
  - f. much needed natural burial space to meet future needs of the Borough's population, which offers good transport links to existing residents, especially from Crews Hill station;
  - g. food growing areas and gardens, especially where they connect with or form part of existing clusters of food production, such as Crews Hill, Capel Manor and Forty Hall;
  - h. new eco-tourism and recreational, sport and leisure activities, such as bird-watching, wild swimming, mountain biking, camping and natural play features;
  - i. Improved hubs of sporting excellence at Tottenham Hotspur training ground, Ponders End and Pickett's Lock;
  - j. the sensitive restoration of historic parks and gardens at Trent Park, Forty Hall and Myddelton House through positive management;
  - k. conversion of publicly-owned farmland into sustainable agricultural/forestry and horticultural units whilst also providing for enhanced public access linking to surrounding rural and urban areas; and
  - l. biodiversity offsetting (including landscape restoration of river corridors).
3. Priority will be given to projects where public accessibility is improved. Projects which solely provide for

habitat creation, biodiversity net gain, carbon sequestration or other forms of environmental benefit, particularly those which can be sold on, will be resisted unless there are demonstrable local public benefits.

4. Proposals which lead to net loss of biodiversity within the area will be resisted. All proposals for biodiversity net gain in Enfield will be required to have regard to the Environment Act 2021, as well as emerging Enfield Chase landscape restoration strategies. For the purposes of the Biodiversity Metric Calculation, this area is defined in this policy as having High Strategic Significance.

## EXPLANATION

3.112 Part 1 of the policy designates this area within Enfield as part of a DEFRA funded pilot scheme for nature recovery. Part 2 of the policy ensures that in accordance with NPPF Paragraph 185, development whose primary objective is to conserve and enhance biodiversity will be supported.

3.113 Situated at a key gateway into London, at its northern most point, the Rural Enfield designation (as shown on the Policies Map and key diagram) defines an attractive green landscape in the urban-rural fringe that extends from Trent Park and Whitewebbs Park in the west to Lee Valley Regional Park in the east. It encompasses significant river corridors, lakes, historic parks and reservoirs constituting approximately one third of the Borough's total land area. Notably, it encompasses two of the largest open spaces: Enfield Chase and Lee Valley Regional Park.

3.114 In a comprehensive study conducted in 2019, found that populations of the UK's most important wildlife have dropped by an average of 60% since 1970. The State of Nature report also highlighted the precarious status of a quarter of UK mammals and nearly

half of the birds assessed are at risk of extinction. Despite conservation efforts to protect habitats, 41% of species have experienced significant decreases, while just 26% have shown any increase. In this context, the most effective approach to addressing this decline is to restore natural landscapes through activities like landscape restoration alongside other vital conservation measures.

3.115 The Lee Valley Regional Park, situated along the banks of the River Lee and navigation canal, comprises a diverse range of linear parks, pathways, nature reserves, wetlands, water sport facilities and recreational spaces. These facilities create a network that connects Enfield to Hertfordshire, Essex and Central London. The Council is fully committed to supporting the endeavours of the Lee Valley Regional Park Authority in unlocking the full potential of the Regional Park.

3.116 Enfield Chase, historically a royal hunting ground of Tudor and Stuart monarchs, was formerly part of a vast forest extending 12 miles northward from the City of London in the medieval era still retains significant but fragmented remnants of historic woodland within parts of Enfield's Green

Belt land. Today, it encompasses a blend of ancient woodlands farmlands and high-quality landscapes, including historic parks, gardens and nature conservation sites. These areas offer panoramic views over London.

3.117 This policy aims to transform the arc of open spaces surrounding the Borough's urban area into a world-leading outdoor cultural and recreational destination. This transformation will interconnect distinct landscapes, enhance east-west connectivity, elevate landscape quality, and concurrently function as a stepping-stone to facilitate wildlife movement and bring nature's revival. This initiative will further strengthen Enfield's identity as one of London's leading green Boroughs, steeped in rich cultural heritage. It will play a pivotal role in transforming the Borough, offering a lifetime of opportunities, including significant health and well-being improvements for all its residents.

3.118 This designation recognises that the Council's aspirations to bring various sustainable rural activities, creating a distinctive and exemplary green destination. The Council will adopt a partnership-driven approach to deliver strategic green spaces in London, recognising the invaluable role of

world-class parks and open spaces in enhancing people's quality of life and well-being. The policy aligns with those principles outlined in the Mayor of London's Environment Strategy and Blue and Green Strategy.

3.119 This policy designation has the potential to achieve a net increase of 25% green cover in Enfield, contributing to significant carbon sequestration. It exceeds the Mayor of London's targets achieving one of the highest net gain outcomes in the UK. This will go a long way in alleviating the pressure from recreational activities and mitigating air pollution's impacts on nature conservation sites of international importance, such as Epping Forest. The Council will also monitor landscape restoration and nature recovery efforts by recording the amount of land cover in these uses within the placemaking area.

3.120 Strategic routes intersect the region such as the London Loop but parts of the urban-rural fringe remain less accessible to a wide cross-section of the public, especially from urban communities. There are considerable opportunities to enhance strategic connections to the Lee Valley Regional Park and Enfield Chase from key growth

areas like Meridian Water, Edmonton, Enfield Town and Ponders End. This involves the provision of new public accessible greenspace and the creation of new or improved active travel routes.

3.121 A substantial tree planting and landscape restoration programme is well underway in the vicinity of Enfield Chase. The future expansion of this programme has the potential to transform significant tracts of farmland



Firs Farm



into publicly accessible landscapes, including woodlands and parklands, extending across 1,000 hectares. This initiative could become one of the only landscape restoration projects in close proximity to a large city in the UK.

3.122 To realise this vision, we will seek contributions from nearby developments and other funding sources such as grants and loans, to facilitate the implementation of the interventions set out in the policy above.

3.123 The Enfield Chase Landscape Restoration project has been awarded £563,000 by the Department for Food, Rural Affairs and the Environment (DEFRA). This grant, in collaboration with the Environment Agency, Natural England, the GLA and Thames 21, will support the Project Development Phase, extending into 2024/25. This pilot project and spatial plan will propose a new approach to managing the landscape within Enfield Chase, serving as a testing ground for new Environmental Land Management schemes that will be rolled out across England from 2025 onwards as part of the 25 Year Environment Plan. The potential land available for landscape restoration is approximately 1,530 hectares (based on contiguous

Council-owned land within the Borough boundary). The core area considered for landscape restoration comprises around 634 hectares has been selected based on a range of key criteria.

3.124 The Landscape Restoration scheme caters to landowners and managers seeking a more radical and large-scale approach to generating environmental and climate benefits on their land. The scheme's objective is to enhance landscapes and promote ecosystem recovery through long-term, large-scale, changes in land uses and habitat restoration projects. This project is funded on a bespoke long term legal agreement involving partnership organisations, allowing landowners to deliver public benefits. It operates under the oversight of Natural England and the Environment Agency, with long term public funding and funding for future green infrastructure projects derived from a blend of sources, including private investment. The scheme's duration extends to at least 20 years, extending beyond the plan period. According to DEFRA, landscape Recovery projects will yield a range of outcomes, with a primary focus on achieving net zero emissions, biodiversity enhancement, and water quality improvement. By reinstating

natural processes through the conversion of farmland into woodlands, meadows, wetlands, coupled with enhanced public access and sustainable commercial activities, these projects offer the potential to provide a wide range of benefits

3.125 All of these uses are considered to be appropriate within the existing Green Belt policy designation, and could be considered beneficial users under policy BG6: Strategy for enhancing the beneficial uses of Green Belt and Metropolitan Open Land. Although some of these schemes will require planning permission, for instance, where they require an Environmental Impact Assessment or any forthcoming criteria, others, such as tree planting will not require such permission. This policy aims to offer guidance from a planning perspective on the development of these projects. It acknowledges that the project is primarily conducted by the London Borough of Enfield on council-owned land, with extensive governance measures involving government departments, funders and statutory consultees. This process will also be governed through statutory provision that form part of the Environment Act 2021, which are yet to be enacted. This includes the Statutory Local Nature Recovery Strategy that will be prepared in 2024/25 by the Greater London Authority.

# PL10 CHASE PARK

## Context and Characteristics

3.126 The Chase Park Placemaking Area (CPPA) is shown on Figure 3.13 and on the Key Diagram and Policies Map. The CPPA is bounded to the west by Trent Park, south and east by existing residential suburbs of Oakwood and Enfield Chase, and north by Hadley Road. It provides the opportunity to deliver high quality development in the form of a new sustainable neighbourhood of Enfield, securing significant environmental and social benefits through the provision of improved access to existing green spaces and the surrounding rural area, whilst delivering new homes and related facilities and services.

3.127 CPPA sits immediately adjacent to the existing suburban edge of north west Enfield. It is approximately 2.5 kilometres north west of Enfield Town, which is the Borough's primary shopping centre and a major employment centre and west of Oakwood underground station on the Piccadilly line. The existing area to the east and south is mostly residential streets, although there are also a range of community facilities such as shops and schools, and Chase Farm

Hospital – a major health facility – which is located on the north-eastern edge of the area. As well as being a key healthcare facility, the hospital is an important employment location. The area comprises typical urban-edge landscape, with extensive areas of pasture and some areas of trees and planting.

3.128 The urban edge of Enfield around the CPPA comprises typical 1930s suburban homes - a mixture of detached and semi-detached properties with large rear and often front, gardens. There are some infill developments that are more recent – such as small clusters of 1960s-70s terraces. The housing is generally of good quality, the majority of houses having large plots and private gardens.

3.129 The area is in proximity to a variety of public transport options, with three train and tube stations within approximately 1 mile. It also has regular bus services running through and around the area. Existing bus provision includes four services with up to 11 buses per hour running on the A110 - a key east-west corridor which runs through the placemaking area. Three additional bus services are located northeast of the

site. National Cycle Route 12 runs to the north, but there is a break in provision as it passes. There are a few schools within approximately 1.5 kilometre of the area, local medical facilities and local retail parades in Enfield Chase and Oakwood.

3.130 The topography of the area is undulating and defined by the two watercourses which run through it – the Salmons Brook and the Merryhills Brook, which form localised valleys. To the east the area is enclosed by the more elevated land along the ridge of which the Ridgeway runs and to the west there is another area of higher land, which roughly follows the route of Cockfosters Road.

3.131 The landscape is generally laid to pasture with geometric fields enclosed by hedgerows, which form part of a larger contiguous area of arable farmland which stretches to the M25 and beyond. There are larger arable fields in the west and smaller arable fields in the east of the CPPA. There are several features that provide landscape value including semi-natural habitats, field boundaries and the SINC, along with several large areas of woodland that provide a backdrop to views, and

some of which are fragments of Enfield Chase. In addition, mature vegetation aligns the existing watercourses. There are also several golf courses in the wider area, and other recreational facilities at Trent Park, which create distinctive landscape patterns and forms.

3.132 The area is historically characterised by being part of the Enfield Chase from medieval times, although since the 18th Century agricultural land use has increased. It is adjacent to the later development of the Trent Park Estate which is now a Registered Park and Garden and Conservation Area. An army camp and anti-aircraft gun battery were located at Slade's Hill within the eastern part of the site during the Second World War. Trent Country Park was opened to the public in 1973 and remains open to this day. Whilst the placemaking area has remained largely in agricultural use, by the 1970's, the growth of Enfield suburbs expanded to the edge of the Green Belt along with the development around Oakwood underground station to the west (Grade II\* listed).

3.133 Chase Park falls predominantly within the Merryhills Brook Valley Landscape Character Area, which contains a Borough grade SINC (Royal Enfield

Rifles Site) and Woodland at Vicarage Farm Borough grade I SINC) on the eastern side. The SINC consists of wet woodland, neutral grassland and hedgerows as well as the Brooks and also contains the former military camp. Ancient woodland is prominent to the north-west of the placemaking area at Trent Park.















### CHASE PARK PLACEMAKING VISION

**The comprehensive development of the Chase Park Placemaking Area will create a distinctive, sustainable and healthy new neighbourhood. Shaped by the brooks, hedgerows and SINC that define the area, and its relationship to the adjoining woodlands and historic landscape at Trent Park and the wider Enfield Chase area and restored landscapes, Chase Park will be an exemplar of design quality and provide a mixture of homes to support people through all stages of their lives, with a particular focus on the provision of family housing. This urban extension will provide approximately 3,700 homes in total together with a mix of other uses and enhanced transport connectivity.**

**The new neighbourhood will benefit from enhanced connectivity and access to green infrastructure, contributing to the Borough's rural transformation and will provide a range of other uses, including a mixed-use local centre, a primary school and other local parades. Provision of facilities and services will provide local employment opportunities for new and existing residents.**

**Situated on the main east-west route through the Borough, Chase Park will help to meet Enfield's development needs (in particular the need for more family and affordable housing) and provide wider benefits through improved connectivity, environmental quality and enhanced public transport, with a strong emphasis on improved active travel and sustainable movement. It will also facilitate access to the Borough's rural transformation area to improve the health and well-being of residents and visitors alike. It will provide opportunities to link the wild places within the site and in Enfield Chase to the north, to the south – extending green and blue infrastructure networks, improving their quality and access to nature for the benefit of all.**



-  Rural Placemaking Areas
-  Green\_links
-  Green\_loop
-  Listed\_Building
-  Green Belt
-  Conservation Area
-  Mixed Use Site Allocation
-  Housing Site Allocation
-  North London Waste Plan Site
-  Ancient Woodland
-  Metropolitan Open Land
-  Registered Parks and Gardens
-  Scheduled Ancient Monuments
-  Locally Listed Heritage Assets
-  Site of Metropolitan Importance for Nature Conservation
-  Site of Borough Importance for Nature Conservation
-  Site of Local Importance for Nature Conservation
-  Local\_Centre
-  Local Open Space
-  Wildlife Corridor
-  Archeological Priority Area

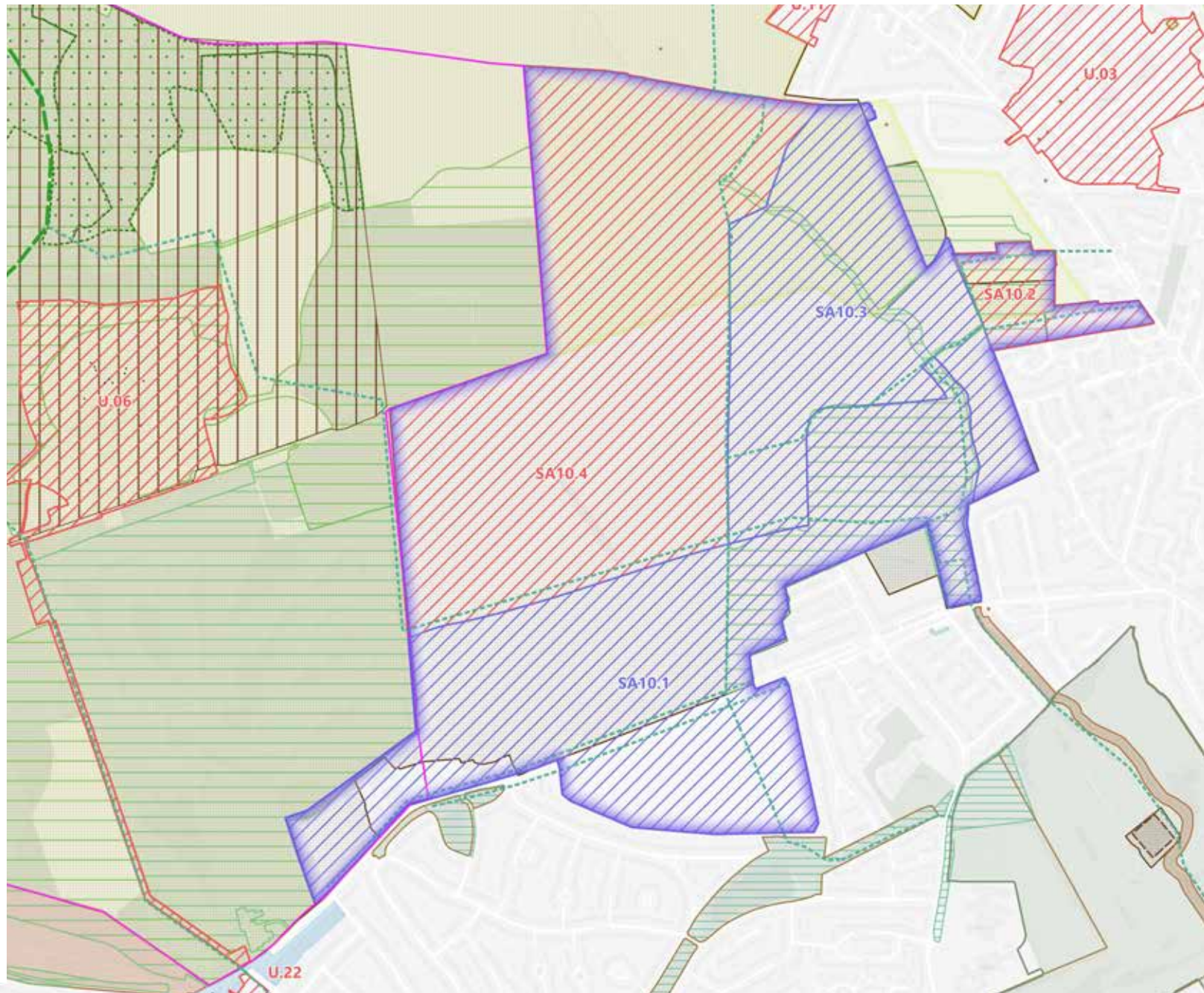
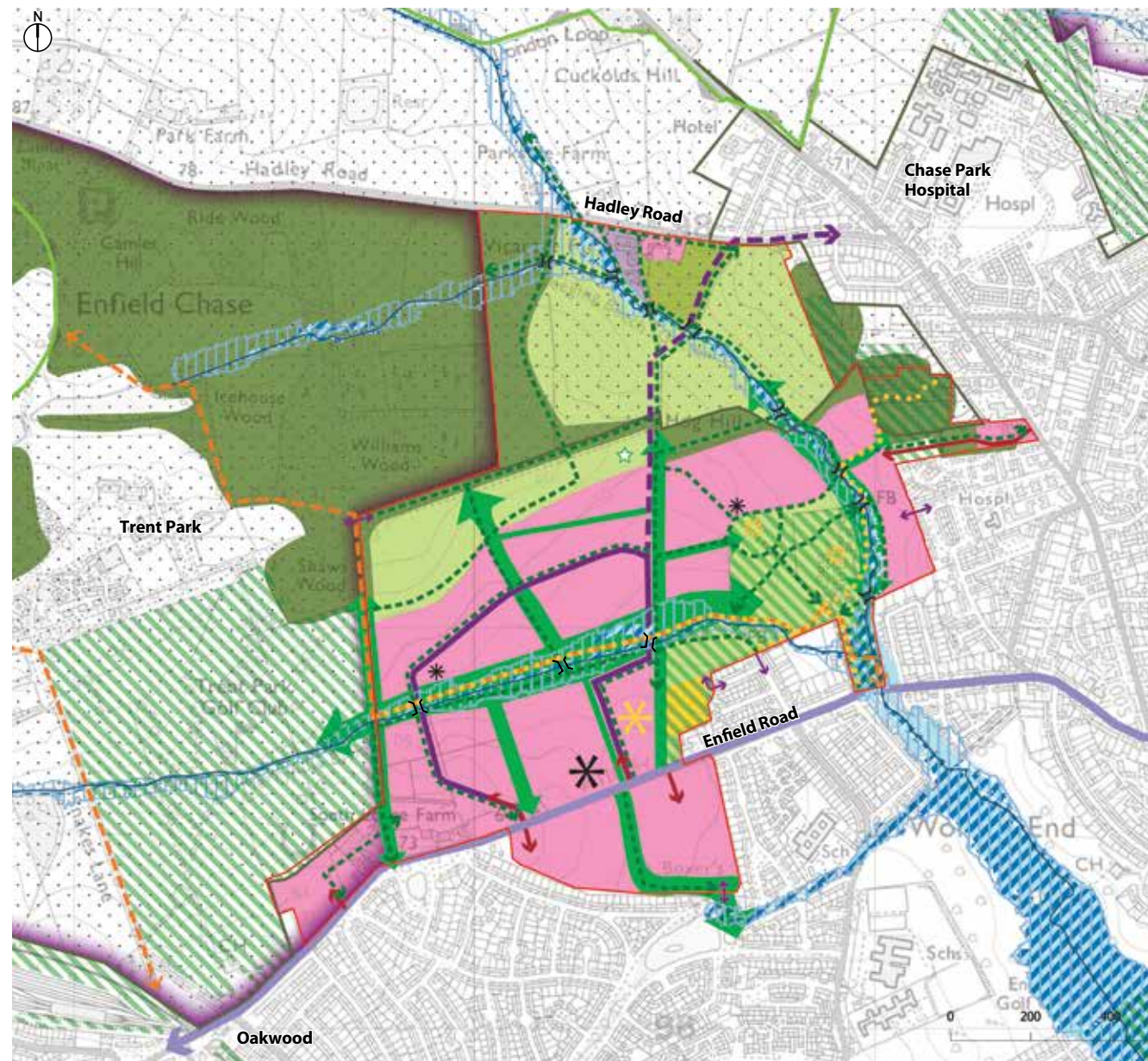


Figure 3.11: Chase Park Policy Map Extract





Proposed framework plan for Chase Park

\*Location of school playing fields to be agreed with LBE, subject to further ecological surveys of the SINC and appropriate habitat enhancements.

Figure 3.12: Chase Park placemaking area - illustrative framework plan

## STRATEGIC POLICY

# PL10: CHASE PARK

This policy is set out in two parts:

- 1) Part 1: Overarching Strategic requirements – describing the overarching site requirements and land use parameters; and
- 2) Part 2: Strategic Design and Delivery Principles– prescribing the overarching components needed to deliver the necessary quality for a healthy, liveable and sustainable settlement, setting out the expectations for how the delivery of the scheme should be achieved.

### Part 1: Overarching Strategic Requirements

1. In line with Policy SS1 land at Chase Park is allocated for residential-led mixed use development to deliver a new sustainable urban extension.
2. Development across the Chase Park Placemaking Area will be delivered to create a high quality, distinctive, well connected, sustainable new neighbourhood in accordance with the vision for Chase Park, the key principles and requirements set out below and any other relevant policies in the Enfield Local Plan or other relevant supplementary planning guidance. A more detailed

comprehensive masterplan for the placemaking area must be prepared, building on the illustrative framework prepared to date (**Figure 3.11**). This must be approved by the Council prior to planning permissions for the allocation site being granted or as part of the initial application for planning permission. The detailed masterplan should be jointly prepared by the Council, the local community, and landowners. The masterplan will be used as a benchmark in reviewing proposals for development. Prior to the submission of any planning application(s) for the allocation site further design work through the pre-application engagement process will be required.

3. The comprehensive development of the area should be done in a way that supports sustainable, low carbon lifestyles and plays a key role in addressing the effects of climate change by creating mixed use, resilient communities and meeting the requirements of Policies SE1-SE9.
4. The development will deliver multifunctional green and blue infrastructure to meet strategic and local

requirements in accordance with other policies BG1-13 and in broad accordance with the illustrative Framework Plan (Figure 3.2).

5. The CPPA should deliver a total residential capacity of around 3,700 new homes, including affordable family housing and older persons accommodation, together with the provision of supporting infrastructure and new and improved green and blue infrastructure. This will comprise of the delivery of circa 2,550 residential homes in the Plan period up to 2041 together with the associated infrastructure needed to facilitate this growth and deliver on all policy requirements. The remaining 1,215 residential units and associated infrastructure are anticipated to be delivered beyond 2041.
6. New neighbourhoods within CPPA must be located in areas with good access to enhanced public transport options. Residential densities will reflect access to public transport and facilities along with a clear street hierarchy, with higher density development in those areas with the best access to rail and bus services.

7. Development proposals should deliver an appropriate variety of housing sizes, types and tenures in accordance with the Borough's identified needs and the specific needs in the north of the Borough. This must include provision of affordable housing in line with policy SP H2 (Affordable Housing), specialist accommodation, including older persons housing, in accordance with policy DM H5 (supported and specialist housing) and should include self and custom build plots in accordance with Policy DM H6 (community led housing), with an emphasis on providing new family housing that can create a balanced and inclusive community to meet identified needs. The provision of Gypsy and Traveler pitches must be explored subject to the policies and proposals to be set out in the Enfield Traveler Local Plan.
8. Development proposals for the overall area must deliver a range of uses in order to optimise the sustainability of the urban extension and meet day-to-day needs. This should include:
  - a. provision of land for one 3-form entry primary school (Class F1) with sufficient capacity to co-locate early years / nursery facilities;

- b. a range of uses in the form of a local centre and additional local parades. This could include retail, community and health facilities and other related social infrastructure required to support the community; and
  - c. Employment generating uses, which should be directed towards the Local Centre and Local Parades, potentially including the provision of co-working spaces.
9. The CPPA has been subdivided into a number of allocated sites which collectively must come forward in a comprehensive and phased manner. The proposed site allocations will include sufficient land to enable the creation of a new sustainable neighbourhood over the long term. The site allocations are identified on the Policies Map. Specific requirements for each site are set out in separate Site Allocation Policies for each allocation.

## Part 2: Strategic Design and Delivery Principles

10. The CPPA must come forward through a strategic and comprehensive approach, ensuring the coordination of development between sites and with the delivery of infrastructure and services. A

site wide detailed Masterplan must take forward the design concept set out in the illustrative Spatial Framework (Figure 1.1), to establish an overall coordinated approach to the area, the distribution of land uses, additional design guidance including the approach to design codes, as well as phasing of development and a more detailed approach to infrastructure requirements and provision across the CPPA as a whole.

11. Planning applications for whole or parts of allocated sites must be in accordance with the policies set out in the Local Plan and additional guidance set out in an approved site wide Masterplan. Planning applications must demonstrate how they will contribute to the ultimate delivery of comprehensive and joined up development across the Placemaking Area including the provision of the overall necessary mix of uses and all necessary infrastructure. Proposals must also demonstrate that they will not prejudice the overall long-term development in the wider placemaking area.

## Urban Design and Layout

12. To realise the placemaking vision, development at Chase Park must demonstrate how it will contribute to



- making a good place in line with policy ‘SP SS2: Making good places’. This includes how it will:
- a. take a landscape-led approach to urban design, to deliver a healthy, walkable and climatically adapted public realm and multi-functional green and blue infrastructure. Development must take into account the site’s natural assets, including the watercourses, and make a positive use of the landscape’s natural systems to ensure the long-term health, resilience and sustainability of the new neighbourhood.
  - b. deliver a walkable and permeable neighbourhood via its layout, design, streetscaping and connections to encourage links to amenities, services and sustainable travel.
  - c. reflect the rural and historic agricultural character of the area to the north and west through an urban form that includes a sequence of blue and green spaces and connections and provides a diversity of uses and character.
  - d. respond to the topography of the area and the historic and continued presence of the Salmons and Merryhills Brooks.
  - e. acknowledge the townscape of the local residential context but deliver a more efficient use of land at an overall higher density, in a sustainable urban form, making appropriate use of the topography to optimise site capacity.
  - f. include a range of densities that are appropriate to a more urban neighbourhood, with a focus of higher density development along Enfield Road, the new local centre and within walking distance of Oakwood station, and elsewhere with improved public transport accessibility.
  - g. establish an overall development layout and density approach that reflects the natural landscape, woodlands, designated SINC, views, local topography and historic environment, building heights should reduce further away from the local centre and the main public transport corridors and should be sensitive to edges with existing adjoining woodlands, Trent Park and the existing properties along the eastern and southern boundaries.
  - h. respect the significance and setting of Trent Park and surrounding designated assets, the conservation area, parkland and adjoining woodland, including Williams Wood and Shaws Wood.
  - i. ensure that development is flexible to accommodate likely changes over a 15 year or greater build-out period. Design choices should be robust, resilient and adaptable, and take into account the latest knowledge and technology advancements in relation to changing working patterns, personal preferences and life circumstances, economics and climate change.
  - j. positively respond to the landscape and watercourses along the eastern, northern and western edges of the development which form the edges of the site, while development along the southern edge of the Placemaking Area which abuts existing residential areas will need to carefully mediate the change in density between the existing suburbs and the new higher density development within Chase Park itself.
  - k. act as a gateway into the wider Chase Park area along the Enfield Road frontage, while development along the Merryhills Brook should respond to the important blue-green function of the watercourse.
  - l. facilitate a shift towards a net zero carbon future through new energy efficient homes and facilities which should connect into local heat networks.



## Green and Blue Infrastructure provision

13. The design and layout of development must provide a new and improved network of green infrastructure, incorporating a variety of typologies of publicly accessible open space in order to respond positively to the surrounding landscape. Development proposals in Chase Park:

- a. must protect and enhance greenspace and valuable ecological areas within the site, including the SINC (Royal Enfield Rifles Site), high quality hedgerows and woodland corridors, and the existing watercourses of Salmon's Brook and Merryhill's Brook. These features must be incorporated within publicly accessible green spaces and corridors.
- b. must deliver a suitable mix of public and private spaces, whilst acknowledging the wider open space setting of Trent Park and the rural area, providing an abundance of opportunities to enjoy the nature and wildlife within easy reach of all homes. Development should facilitate easy access to this wider landscape setting by using sustainable and active modes of travel.
- c. must facilitate a natural extension of

Trent Country Park into the northern part of the area, retaining a natural parkland character, incorporating woodland, trees and hedgerows, wetland and grassland habitat, amenity green spaces, play areas and drainage attenuation. This part of the Placemaking Area is to be retained as Green Belt with enhanced accessibility, amenity and habitat quality.

- d. should provide appropriate buffers to existing woodland within and at the boundaries of the site, incorporating additional woodland planting to protect and enhance biodiversity and enhance the overall landscape quality of the placemaking area and enhance habitat connectivity.
- e. should create a range of new open spaces including a hilltop view park at the highest point of the placemaking area, providing local views across the country park and long-distance views towards London skyline, a heritage park to include the former Slades Hill Military Camp and Battery and the SINC (Royal Enfield Rifles Site), new open spaces along the brooks along with new and enhanced defensible Green Belt boundaries.
- f. must improve green links both for active travel and biodiversity corridors

providing east-west and north-south publicly accessible green corridors linking together ecological sites, water courses, flood mitigation measures and heritage assets and connections to the rural transformation area.

- g. must provide high quality play spaces at a variety of scales and sizes through a combination of designated and informal playable space including natural play within the Country Park. The play areas should be easily accessible on foot and cater for all ages. More localised doorstep play must be provided within individual development parcels.
- h. should integrate sustainable urban drainage systems (SUDS) into the public realm, which are designed to be multi-functional, people-focussed spaces and provide an approach to site wide water management. Areas for wetland habitats should be created alongside surface water flood mitigation and contribute to the Salmons Brook naturalisation proposals. The comprehensive SUDS will also need to contribute to the delivery of strategic flood mitigation, contributing to the performance of downstream locations across the Borough. New development should be designed to have the capacity and means of retaining

storm runoff which would otherwise be dealt with at on site locations downstream and in more constrained urban infill locations.

- i. should provide growing spaces including community orchards and allotments. Provide trees on all streets wherever appropriate and within public spaces.
- j. must demonstrate how ongoing management and maintenance of the green and blue infrastructure will be achieved in accordance with the wider requirements set out in this policy on stewardship and governance.
- k. must deliver a minimum of 20% biodiversity net gain in alignment with the biodiversity net gain strategy.

### **Movement and Connectivity Requirements**

- 14. Development proposals should set out how the ambition of 75% sustainable transport mode share (as set out in the London Plan) for the Chase Park Placemaking Area will be achieved including how the London Plan car and cycle parking standards will be achieved. Development should provide limited residential parking to promote active travel. On-street parking is preferred and should be integrated into the public

realm, interspersed with tree planting. Residential podium parking must not create long stretches of inactive building frontage and has potential to take advantage of site level changes.

- 15. To enable easy access to sustainable modes of transport, minimise the use and reliance on private vehicles, and improve connections to the rest of the Borough and wider region, development in Chase Park must deliver and/or contribute to:
  - a. providing opportunities for convenient and safe active travel throughout the area, across separate site allocations and creating strong north-south and east-west active travel corridors. Cycle and pedestrian priority streets and routes should permeate all development areas and should connect to existing and proposed surrounding strategic routes. New streets and spaces should be planned to prioritise and encourage walking and cycling and ensure safe, quiet, and healthy living environments.
  - b. the network of cycle and walking routes which should connect all parts of the site with the existing street, footpath and cycleway network (in particular addressing the break in provision of National Cycle Route 12) and access

to Trent Park, the London Loop, and existing neighbourhoods and facilities to the east and south, including Enfield Town, Oakwood station, Chase Farm Hospital, and Boxer's Lake open space, amongst others.

- c. improving existing/creating new public transport corridors through the Placemaking Area, working in close partnership with TfL to ensure that new residents have good access to new and improved bus routes and services, in order to achieve TfL's aim of all Londoners living within 400 metres of a bus stop. This includes consideration of a new or extended bus route from Enfield Road to Hadley Road as part of the north-south active travel corridor.
- d. improve the key east-west corridor of the A110/Enfield Road to enable vehicular accesses to the area and as improved bus corridor and an upgraded/improved cycleway and walking route with new dedicated lanes where physical constraints allow this to be accommodated. Pedestrians and cyclists should be prioritised at junctions to enable easy access between northern and southern parts of the Placemaking Area.
- e. appropriate improvements in off-site

walking and cycling, such as towards Enfield Town and to Oakwood Station. A corridor wide strategy will be required to deliver bus, walking and cycling enhancements along Enfield Road.

- f. reducing the need for longer distance travel via the creation of local centres, local parades and local amenities within 5 and 10 minute walking catchments.

### **Social and Community Infrastructure Requirements**

- 16. Development must provide necessary social and physical infrastructure ahead of or in tandem with housing delivery, in order to support the comprehensive development of Chase Park. Facilities and services should be located within 10-minute walking catchments of new homes and embedded in the community to support active and sustainable travel to them from all parts of the development. Key infrastructure requirements include the provision of:
  - a. a mixed use local centre located centrally in the southern part of the Placemaking Area, close to / at the entrance from Enfield Road and fronting onto high quality public realm.
  - b. a new three-form entry primary school in close proximity to the local centre. The school site should be designed to make efficient use of land reflecting the urban context. The specification and detailed location for the primary school is to be agreed with LBE education officers. Soft outdoor play areas (playing fields) should be located within publicly accessible open space adjacent to the school (within the SINC subject to appropriate compensatory ecology enhancements) and have shared used with the local community.
  - c. multi-generational community infrastructure: playable landscapes, flexible community hall space, meeting places, early years provision, and health care services located within the local centre and local parades or within the residential areas. Community and healthcare facilities should be provided within the earlier phases of development to ensure the needs of the population are met.
  - d. two locations for local parades serving the north-west and north-eastern parts of the Placemaking Area and located centrally within the new neighbourhoods
  - e. a multi-functional network of green and blue infrastructure including community food growing, which is easily accessible to new and existing residents, promoting

healthy, active lifestyles.

- 17. To help establish a strong community, proposals will need to set out the long-term governance and stewardship arrangements of the social and community infrastructure (including green and blue infrastructure) and the community development activities appropriate to the creation of a new community. Planning obligations will be sought to secure long term funding, maintenance and stewardship of the assets where necessary.

## EXPLANATION

3.134 The proposed site allocations across the Placemaking Area include sufficient land to enable the creation of a new sustainable urban extension to Enfield over the long term. Sites anticipated to come forward in the next plan period are also being removed from the Green Belt now as shown on the Policies Map. This will create a new defensible Green Belt boundary that will endure into the future whilst also enabling a long-term comprehensive approach to be taken to development within the Placemaking Area, giving certainty to the overall development capacity and infrastructure needs of the area. This is in accordance with the NPPF September 2023 which sets out in Section 5, Delivering a Sufficient Supply of Homes, how the plan making process should positively plan to identify appropriate land for homes. It goes further to state that a significant step towards meeting the housing shortage is often through larger scale development, such as new settlements or significant extensions to existing villages and towns and that local authorities should identify suitable locations for such development to help meet identified needs in a sustainable way (NPPF para 73).

3.135 The development will help meet the wide range of housing needs across the Borough as detailed elsewhere in this plan. In particular, Chase Park will deliver a significant number of affordable and family homes in a sustainable location. There is also the potential to accommodate pitches for Gypsy and Traveller accommodation if required (subject to the outcome of the Traveller Local Plan process).

3.136 Mixed use development in this location will support low carbon lifestyles by providing local facilities and services to support the new neighbourhood(s) in this urban extension. This aligns with the overall Local Plan vision of creating a deeply green place – and the associated strategic objectives, as well as the Council’s broader Climate Action Plan goals. A new local centre at the heart of the neighbourhood will also serve as a gateway for visitors to the Country Park and destination landscapes in the wider area through the provision of leisure, eco-tourism and education facilities and activities. The provision of additional local parades will ensure that all homes are within a suitable walking distance of services and facilities to meet their needs and encourage a more sustainable, walkable neighbourhood.

3.137 Planning for active travel will also contribute towards this goal. Proposed development must also consider the topography of the site, which could make walking or cycling challenging for some. Innovative and considered urban design along with public transport schemes such as electric bikes should therefore be a considered option, providing appropriate locations for picking-up and dropping-off bikes.

3.138 The necessary electric vehicle charging infrastructure should also be designed and delivered appropriately, adhering to principles of universal design and clutter free public realm. Vehicle sharing clubs should also be encouraged. These less polluting vehicle options should be coupled by planning for clean air zones/ car free, especially around the schools.

3.139 A new primary school will be required to meet the needs of the new community. It can be located centrally on level ground but also in combination with other open space and landscaping to ensure the efficient use of land. Innovative design solutions should be explored to enable this to happen such as a multi storey school building, which could be co-located with other uses, shared public realm and access to other shared public facilities and spaces.



3.140 The spatial framework landscapes are primarily driven by ecology and connectivity requirements. This ensures not only the needs of the new community are met but provides opportunities to integrate with the wider rural green infrastructure as part of the rural transformation area. This will enable the provision of a range of formal and informal green space, including new public parks, formal and informal areas of green space to meet the needs of the community.

3.141 A comprehensive approach to the design and delivery of the new neighbourhood will be required. This can be achieved by requiring a site wide masterplan which can take forward the design concept set out in the illustrative Spatial Framework (Figure 1.1), to establish an overall coordinated approach to the area, the distribution of land uses, additional design guidance including the approach to design codes, as well as phasing of development and more detailed approach to infrastructure requirements and provision across the CPPA as a whole. The site wide masterplan will be produced in partnership with the developers, landowners, key stakeholders and in consultation with the local community.

3.142 As a minimum the site wide Masterplan will:

- establish a clear baseline of evidence and understanding of the site
- provide a spatial vision and place making objectives
- illustrate the key structural landscape elements around which the development proposals should be framed;
- establish a clear movement framework for all modes of travel, with priority for active and sustainable modes (walking, cycling and public transport), including connectivity and all intended links with existing routes and destinations along with primary and secondary routes. It should be demonstrated how proposed development within the allocation site will incorporate the full range of sustainable transport measures, including enhanced bus services, north-south and east-west active travel routes and key points of access into the placemaking area/development parcels to support improved walking and cycling from the surrounding area.

- incorporate a green and blue infrastructure (GBI) plan which is informed by relevant surveys and baseline evidence, which could include an ecological impact assessment and heritage and landscape character assessments; The GBI plan should set out a framework and network of spaces to meet strategic and local requirements, including retention of habitats, hedgerows and brooks, formal and informal play spaces, sport and opportunities for growing food;
- a site wide strategy for Biodiversity and Landscape
- a site wide strategy for sustainability and energy
- an urban design framework, including land uses, block structure, densities and heights, key frontages, edges and interfaces, landmarks and gateways and character areas.
- set out a comprehensive approach to the phasing of development and on and off-site infrastructure delivery for the placemaking area as a whole and as necessary to support each phase.

3.143 Given that the land is in a number of different ownerships and the majority of the green and blue and social infrastructure is located within a single land ownership, it will be essential that the contributions to shared infrastructure requirements are based on an equitable equalisation mechanism. An equalisation mechanism to permit development to proceed will need to be agreed by all landowners. The Council has been taking a proactive lead in convening developers and landowners through a developer forum for the placemaking area to agree such matters.

3.144 Developers will be strongly encouraged to develop proposals in line with standards that can assist with securing an exemplary urban extension in line with vision for the area. This could include BREEAM communities – a framework to integrate and assess sustainable design in the masterplanning of new communities and/or the Building with Nature framework.

3.145 The existing neighbourhoods and wards surrounding Chase Park are shown in the evidence base to be wards with higher levels of deficiency of access to open space. As such it will be essential that new development provides a network of green and blue spaces that connect to existing communities for the benefit of existing and future residents. New publicly accessible parks and open spaces should capitalise on the areas existing assets such as the brooks which run through the site and uncover and enhance the heritage within and around Chase Park. The area also has a gently rolling topography which enables extraordinary and expansive views in the north western part of the area, which are not currently open to the public. Locating parks and open spaces in these areas can introduce highly valuable opportunities to open up access for existing and future residents.

3.146 The placemaking area also acts as an upland soakaway, with the confluence of two major watercourses – Salmons Brook and Merryhills Brook located within the area. Development in the area can help deliver flood risk mitigation that helps minimise issues downstream, particularly in the most vulnerable areas in the south eastern part of the Borough (which is also home to the areas with greatest levels of deprivation in the Borough) thus creating significant

positive water management benefits. Careful considered integration of SUDS from the outset will therefore be an essential component of any development proposals which come forward in the area. The strategic location of Chase Park in proximity to the Borough's Rural Transformation area in the north, means that it can also deliver this as part of a comprehensive approach across the whole of Rural Enfield (as set out in policy SP PL9 Rural Enfield).

3.147 At the heart of the strategic rationale for considering the development of an urban extension in this location, is the need to deliver more family homes. As a result, putting children at the heart of the placemaking approach will be an essential component of ensuring the vision can be successfully executed. Landscapes and public realm should be designed with playable features in mind – both formal and informal – and road and street networks should facilitate safe and independent travel for young people. This is line with the Mayor's Play and Informal Recreation SPG (2012) or any subsequent successors. This will be a place for children today in the future, and opportunities should be taken to creatively co-design key spaces with local communities – with a particular focus on young people. This will help embed a sense of ownership

within the local community and begin to foster a framework for community-led stewardship of green and blue and social/community infrastructure as proposals and development progress. Early years provision and a school will also act as key hubs that work to tie the community together, acting as a focal point within the area.

3.148 In addition to this, neighbourhoods should serve a multi-generational community – with older person’s needs also catered for. This should be both in terms of walkability and public realm, as well as health care facilities. Crucially – Specialist Housing for Older People (SHOP) should be integrated into the site in appropriate locations well served within walkable distances of key services and amenities.

3.149 A key factor that will be essential in Chase Park’s success will be whether healthy street design principles can be achieved. Statistics show that as soon as a household has at least one car, use of sustainable transport methods decreases significantly. As such, it will be essential to explore how private car usage can be minimised through creative and innovative solutions. These can be used in conjunction with traditional approaches, which will be explored with key partners such as TfL, which could include

diversion or extension of new and existing bus routes through the area. The topography poses a challenge for integrating cycling, but key routes such as along Enfield Road will be essential opportunities to facilitate connections with the wider area.

3.150 It will be essential for development of the scale envisaged to be supported by appropriate levels of social and community infrastructure. The siting and location of these should seek to strike an appropriate balance between serving future residents, as well as existing surrounding neighbourhoods – to help facilitate social cohesion and integration of the new community within existing the area.

3.151 Development in this location provides a unique opportunity to deliver a strategic scale urban extension that will provide for a significant proportion of the Borough’s housing needs, both within this Plan period and beyond. Overall, the level of ambition will need to be realised through an exemplary quality proposal, that goes far above and beyond conventional approaches to development in order to justify the release of Green Belt in this location. Through adopting the principles set out in this policy proposals will mitigate harm to the Green Belt in accordance with paragraph 142 of the NPPF 2023

through a series of components that will deliver benefits of strategic significance, not just within the placemaking area boundary, but for benefit to the wider area and Borough. Mitigations will be within remaining Green Belt land.



# PL11 CREWS HILL

## Context and Characteristics

3.152 A key component of Enfield's spatial strategy is that four main placemaking areas will accommodate a large proportion of the Borough's future development needs. Strategic Policy SS1 requires that all the placemaking areas will be accessible by sustainable modes of transport with integrated active travel initiatives, to link to existing communities and places of work.

3.153 The Crews Hill Placemaking Area (CHPA) is shown on Figure 3.14, on the Key Diagram and Policies Map. It sits within the north of the Borough centred around the existing station and Cattlegate Road and Theobalds Park Road, which form the main routes through the area connecting it to the rest of the Borough and beyond and is directly south of the M25 which forms the northern borough boundary. It occupies a strategic position in relation to the Borough's rural transformation area– which contains a programme of significant corporate landscape recovery projects with the aim of planting 100,000 trees along a corridor of land between Trent Park and Clay Hill This area which once formed part of the historic Enfield Chase royal hunting ground but had been heavily deforested

after the 18th Century. Projects here have been awarded significant government funding to aid delivery.

3.154 The area is distinct from other built form in the north of the Borough due to topography, access, its mix of uses and the surrounding landscape character. It sits on higher ground, surrounded on all sides by valleys, with the topography sloping away in all directions and Turkey and Cuffley brooks running within these valleys.

3.155 Development within the Crews Hill area, the railway line and road access run along the ridge of the land which forms Crews 'Hill'. Existing horticulture, garden centres, nurseries, equestrian uses, building supplies storage activities that exist within the area have all come about in a piece meal fashion. The area also contains a small number of homes, notably along Rosewood Drive, together with other isolated residential properties across the area. There are limited facilities for existing residents due to the low population and spread of different land uses.

3.156 To the north is the M25, which is generally elevated. Cycle route 12 runs through the area, the majority of which is a traffic free route extending to the

east of the Borough. Severance and access are key issues for the area. Crews Hill station is located in the centre of the area and provides the opportunity for good access into Enfield, Central London, Hertfordshire and beyond.

3.157 The area is historically characterised by agricultural land use, with the remaining isolated farms and farmsteads providing evidence of this activity. The landscape in Crews Hill has gradually developed into a commercial landscape, which has evolved from commercial nurseries to customer-facing garden centres and other types of businesses.

3.158 This policy is set out in two parts:

- **Part 1: Overarching Strategic requirements** – describing the overarching site requirements and land use parameters; and
- **Part 2: Strategic Design and Delivery Principles**– prescribing the overarching components needed to deliver the necessary quality for a healthy, liveable and sustainable settlement, setting out the expectations for how the delivery of the scheme should be achieved.



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## CREWS HILL PLACEMAKING VISION

The comprehensive redevelopment of the Crews Hill Placemaking Area will create a distinctive and sustainable new neighbourhood in North London, comprising of approximately 5,500 homes in total, together with a mix of other uses providing local services and facilities and benefitting from enhanced transport connectivity and access to green infrastructure.

Crews Hill will become an important gateway to the Borough's rural transformation area, providing access to restored landscapes, sustainable ecotourism, sport and recreation for the Borough's residents and visitors from further afield. Building on the area's horticultural and agricultural history, Crews Hill will accommodate new development within a healthy and inclusive environment supported by access to green space and nature. Development here will facilitate sustainable connections to the rest of the Borough and wider region along an east-west green corridor following the route of the London Loop as well as introduction of new enhanced north-south active travel routes connecting it to the rest of the Borough.

Crews Hill will help to meet Enfield's development needs and provide wider benefits for Enfield's residents and visitors through enhanced connections to the environmental, social, and economic assets of Enfield's rural north. New housing and neighbourhoods, integrated alongside elements of the area's horticultural and food-producing industries, will create a vibrant and unique new identity for the area. Existing and new residents will benefit from an enhanced range of local services and facilities to address their needs, including new and improved access to schools, employment opportunities and to open spaces across the wider rural area.

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Crews Hill placemaking area

- Borough boundary
- Crews Hill Placemaking area
- Crews Hill Site Allocations
- Scheduled Ancient Monument
- Listed buildings
- Local Heritage Assets
- Wildlife Corridors
- Registered Parks and Gardens
- Borough SINCS
- Local SINCS
- Metropolitan SINCS
- Conservation Area
- Rivers
- Green Belt
- Metropolitan Open Land
- Local Open Space

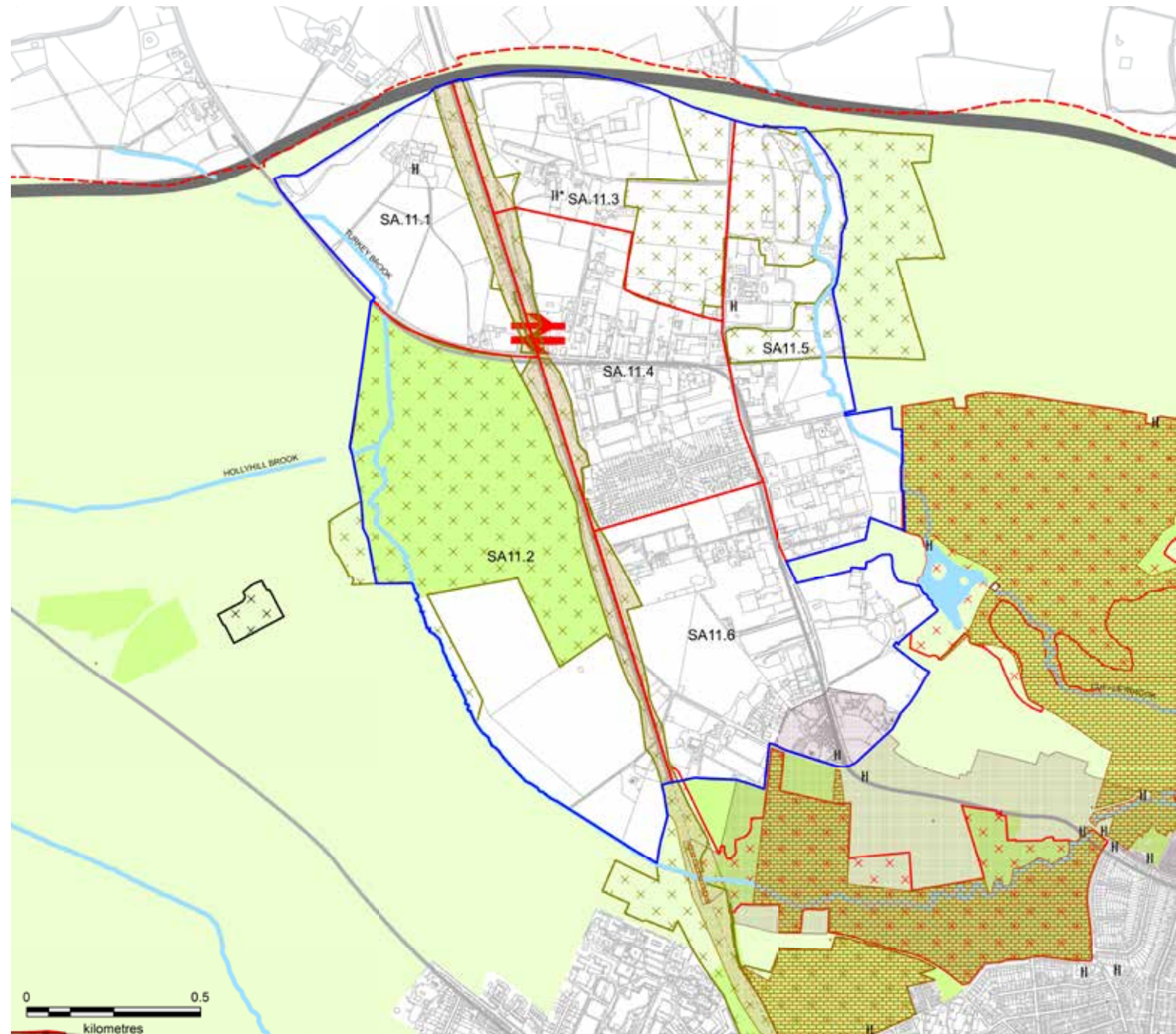
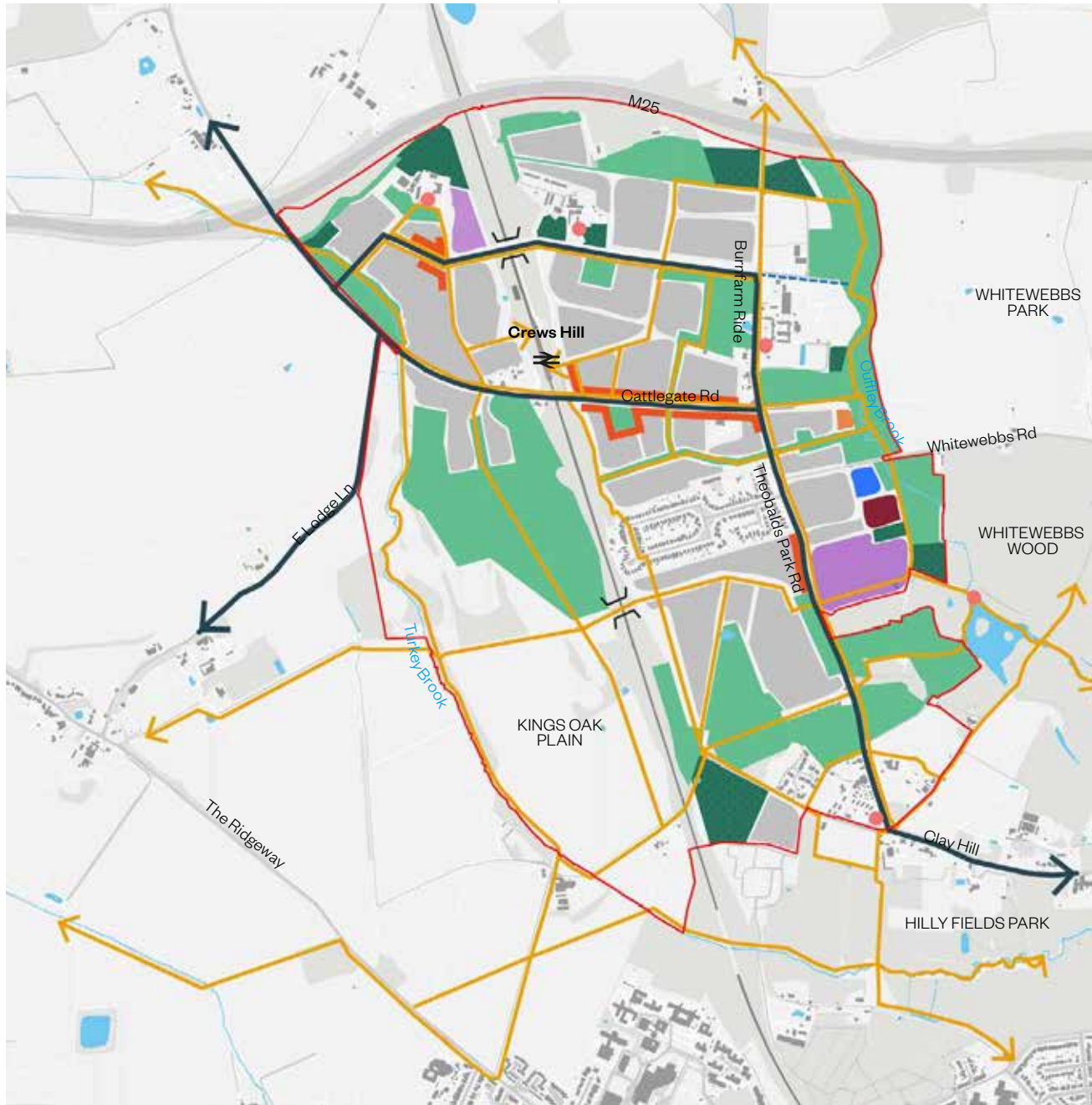


Figure 3.13: Crews Hill Policy Map Extract

## Crews Hill

### Key

- Local Centre frontage (incl. Convenience retail, Healthcare, Community, Leisure) with residential above
- Indicative new school locations
- Existing location of safeguarded waste site - relocation strongly encouraged
- Community and cultural uses
- Commercial (potential relocation of garden centres)
- Open spaces
- Development Areas
- Proposed active travel network
- Proposed public transport network
- Site boundary



**Figure 3.14:** Crews Hill illustrative spatial framework



## STRATEGIC POLICY

# PL11: CREWS HILL

### Part 1: Overarching Strategic requirements

1. In line with Policy SS1 land at Crews Hill is allocated for residential-led mixed use development to deliver a new sustainable settlement centered around the existing under-utilised train station, which will be enhanced.
2. Development across the Crews Hill Placemaking Area (CHPA) will create a high quality, distinctive, well connected, sustainable new neighbourhood in accordance with the vision for Crews Hill, the key principles and requirements set out below and in accordance with other relevant policies in the Enfield Local Plan or other relevant supplementary planning guidance. A detailed comprehensive masterplan for the placemaking area must be prepared, building on the illustrative framework prepared to date (**Figure 3.14**). This must be adopted prior to planning permissions being granted within Crews Hill. The detailed masterplan will be prepared by the Council working in close partnership with the local community, landowners and other key stakeholders. The masterplan will be used as a benchmark in reviewing proposals for development. Prior to the submission of any planning application(s) further design work through the pre-application engagement process will be required. This will be formally adopted as an SPD.
3. The comprehensive redevelopment and intensification of the area should be done in a way that supports sustainable, low carbon lifestyles and plays a key role in addressing the effects of climate change by creating mixed use, resilient communities and meeting the requirements of Policy SP SE1 to SE9.
4. Development proposals should collectively create a mixed and inclusive community, by providing a diversity of employment opportunities, housing sizes, types and tenures and environments in accordance with Policy DM H3 (Housing Mix and Type).
5. The CHPA will deliver a total residential capacity of around 5,583 new homes, including family and affordable housing, together with the provision of supporting infrastructure, and rationalisation of existing uses across the area. The delivery of circa 3,350 residential homes in the Plan period up to 2041 together with the associated infrastructure needed to facilitate this growth and deliver on all policy requirements. The remaining circa 2,233 residential homes are anticipated beyond 2041.
6. New neighbourhoods within CHPA must be limited to areas with good access to public transport options. Residential densities will reflect access to public transport with higher density development in those area with the best access to rail and bus services.
7. Development proposals must deliver an appropriate variety of housing types and tenures in accordance with the Borough's identified needs with an overall emphasis on providing new family housing and the specific needs in the north of the Borough. This must include provision of affordable housing in line with policy SP H2 (Affordable Housing), specialist accommodation to meet identified needs in accordance with policy DM H5 (supported and specialist housing) and should include self and custom build plots in accordance with Policy DM H6 (Community led housing). The provision of Gypsy and Traveller pitches must be explored, subject to the policies and proposal to be set out in the



Enfield Traveller Local Plan.

8. Development proposals should deliver a range of uses in the form of a local centre and additional local parades in order to optimise the self-sufficiency of the settlement and meet day-to-day needs. This should include retail, community and health facilities and other related social infrastructure required to support the community.
9. The retention of specific existing rural uses is important, including equestrian and some horticultural uses, which could be re-provided in suitable alternative locations if existing sites prove unsuitable for retention. Other employment generating uses should be directed towards the Local Centre and Local Parades, potentially including the provision of co-working spaces.
10. The development will deliver multifunctional green and blue infrastructure to meet strategic and local requirements in accordance with other policies in this plan and in broad accordance with the concept plan.
11. Proposals for the overall area:
  - a. must make provision for land for at least two 2-form-entry primary schools with sufficient capacity to co-locate early years / nursery; and
  - b. should make provision for one 6FE

secondary school which could be colocated with a primary school.

12. The CHPA has been subdivided into a number of allocated sites, which collectively must come forward in a comprehensive and phased manner. The proposed site allocations will include sufficient land to enable the creation of a new sustainable neighbourhood over the long term. The site allocations are identified on the Policies Map. Specific requirements for each site are set out in separate Site Allocation Policies for each allocation.

## Part 2: Strategic Design and Delivery Principles

13. The CHPA must come forward through a strategic and comprehensive approach, ensuring the coordination of development between sites and with the delivery of infrastructure and services. An SPD (or any subsequent planning mechanism) will take forward the design concept set out in the illustrative Spatial Framework (Figure 3.14), to establish an overall coordinated approach to the area, the distribution of land uses, additional design guidance including the approach to design codes, as well as phasing of development and more detailed approach to infrastructure

requirements and provision across the CHPA as a whole. The SPD will be produced by the Council in partnership with the developers, landowners, key stakeholders and in consultation with the local community.

14. Planning applications for whole or parts of allocated sites must be in accordance with the policies set out in the Local Plan and additional guidance set out in an approved site wide Supplementary Planning Document (SPD). Planning applications must demonstrate that they will contribute to the ultimate delivery of comprehensive and joined up development across the Placemaking Area including the provision of the overall necessary mix of uses and all necessary infrastructure. Proposals must also demonstrate that they will not prejudice the overall long-term development in the wider placemaking area.

## Urban Design and Layout

15. To realise the placemaking vision, development in Crews Hill should demonstrate how it will contribute to making a good place in line with policy 'SP SS2: Making good places'. This includes how it will:
  - a. take a landscape-led approach to urban design, to deliver a healthy, walkable and climatically adapted public realm and multi-

- functional green and blue infrastructure. Development must take into account the site's natural assets and make a positive use of the landscape's natural systems to ensure the long-term health, resilience and sustainability of the new settlement.
  - b. support the creation of new neighbourhoods centred on the core 'Hill' area and delineated by the surrounding brooks to the west, south (Turkey Brook) and east (Cuffley Brook), which collectively can create a new and unique place.
  - c. ensure development takes a consolidated and compact urban form in order to ensure a sustainable form of development where new residents are within easy reach of, and connected to, the railway station and existing and proposed green and blue infrastructure networks.
  - d. provide a clear separation between the new settlement at Crews Hill and Clay Hill to the south.
  - e. include a range of densities that are appropriate to a neighbourhood, with the highest densities to the east of Crews Hill station, other local centres and the areas with highest public transport accessibility.
  - f. establish an overall development layout and density approach that reflects the natural landscape, long views from the Ridgeway to the west, local topography and historic environment, with the tallest buildings to the east of the railway, and to minimise impacts on long views towards Crews Hill from the west.
  - g. provide a range of uses, including a rationalisation of existing commercial activities, to create a vibrant mixed-use neighbourhood with the main focus on the Crews Hill Station and Cattlegate Road east of the railway line, with other local centres that provide additional local amenities within walking distance of all homes.
  - h. use the context of varied and utilitarian glasshouse building form and horticultural land use to inform innovation in architecture and the public realm such as through the potential for covered public spaces, winter gardens and glass house space for homes, creating a unique lifestyle related to the identity of the place.
  - i. ensure that development is flexible to accommodate the likely changes over a 20-year or longer build-out period. Design choices should be robust, resilient and adaptable, and take into account the latest knowledge and technology advancements in relation to changing working patterns, personal preferences and life circumstances, economics and climate change.
  - j. demonstrate how proposals have considered the relationship between both existing and future anticipated adjacent uses. Proposals will need to demonstrate how as uses and the built form changes over time the impact on the amenity of existing and future residents, in particular the nature of Cattlegate Road and Theobalds Park Road, has been considered and any negative impacts minimized and mitigated.
  - k. facilitate a shift towards a net zero carbon future through new energy efficient homes and facilities which should connect into local heat networks.
  - l. locate energy infrastructure in parts of the placemaking area which have less opportunity for homes due to being constrained by poor air quality and noise pollution.
16. Proposals for the development of the existing waste site as identified in the North London Waste Plan (NLWP) will need to demonstrate that compensatory capacity will be delivered in line with the spatial principles of the NLWP on a suitable replacement site as set out in

the NLWP.

### Accessibility and variety of Open Space

17. The design and layout of development must provide a new and improved network of green infrastructure, incorporating a variety of typologies of open space in order to respond positively to the surrounding landscape. Proposals must:
  - a. protect and enhance ecologically sensitive habitats and areas including Whitewebbs Wood Metropolitan SINC, Crews Hill Golf Course Grade I SINC, Glasgow Stud Grade I SINC, Crews Hill to Bowes Park Railsides Grade I SINC, Salmon's, Turkey and Cuffley Brooks riparian corridors, Habitats of Principle importance, irreplaceable habitats such as ancient woodland, and linear features such as hedgerows and tree lines. Take opportunities to link ecological features across the site and beyond. In particular, opportunities to link isolated parcels of priority deciduous woodland through new woodland planting should be taken, where possible.
  - b. seek to protect and enhance SINC's within the placemaking area and ensure there are no long-term adverse impacts on the SINC's' function as wildlife corridors and protected sites. Therefore development must:
    - follow the mitigation hierarchy during the design process;
    - protect and, enhance the important ecological features of the SINC and improve their overall condition;
    - include a full ecological impact assessment of potential impacts to SINC's as a result of development, to be prepared by a suitably qualified ecologist; and
    - where development within the SINC is unavoidable, an appropriate mitigation and compensation strategy should be prepared by a suitably qualified ecologist.
  - c. respond to the surrounding landscape, including the Theobalds Estate South Area of Special Character (ASC) and Whitewebbs and Forty Hall ASC to the east, Clay Hill ASC to the south and Turkey Brook Valley ASC to the west.
  - d. provide a 50m buffer from ancient woodland around Whitewebbs Wood SINC and priority deciduous woodland to mitigate from any impacts from the proposed development. This space should provide both natural space and public parks linked to a new local parade along Theobalds Park Road.
  - e. create new open spaces along the brooks to reinforce new defensible boundaries to the Green Belt.
  - f. improve green links both for active travel and biodiversity corridors east-west through the Placemaking Area, and in particular along existing water courses and to connect to Enfield Chase and the rural transformation area.
  - g. provide growing spaces, including community orchards, and where feasible indoor growing spaces could be connected to the heat network.
  - h. provide trees on all streets where appropriate and within public spaces.
  - i. include appropriate Sustainable Drainage Systems as part of a comprehensive approach to site-wide water management in accordance with Policy DM SE9 (Sustainable Drainage Systems). Proposals will also need to contribute to the delivery of strategic flood mitigation, contributing to improving the performance of downstream locations across the Borough. New development should be designed to have the capacity and means of retaining storm runoff which would otherwise be dealt with

- at on site locations downstream and in more constrained urban infill locations.
- j. avoid inappropriate uses in functional flood plains and protect the diversity of habitats along the Salmons, Turkey and Cuffley Brooks as well as along other smaller watercourses and in other green spaces in the area.
- k. deliver a minimum of 20% biodiversity net gain in alignment with the biodiversity net gain strategy.
- l. increase a buffer of green and open uses along the M25, providing a loop of natural spaces around Crews Hill and linking and enhancing ecological areas. Mitigation for noise impacts from the M25 for development to the north should be delivered, and appropriate mitigation measures included such as bunding (subject to other landscape and visual sensitivities), tree planting and/or setbacks in order to protect sensitive uses, such as schools, nurseries, homes and publicly accessible open space. The design of all residential properties should mitigate the blight of motorway noise in their layout, design and outside space.
- m. support the emergence of Crews Hill as a space of arrival into the rural transformation area for new and existing

residents of the Borough, new public spaces around the station connected to green links to the surrounding designated landscapes, for example Enfield Chase, and the National Cycle Network route 12 as shown on the illustrative Spatial Framework at **Figure 3.14**.

- n. Demonstrate how ongoing management and maintenance of the green and blue infrastructure will be achieved in accordance with the wider requirements set out in this policy on stewardship and governance.

### **Movement and Connectivity Requirements**

- 18. To enable easy access to sustainable modes of transport, minimise the use and reliance on private vehicles, and improve connections to the rest of the Borough and wider region, development in Crews Hill must include and/or contribute to the following:
  - a. providing opportunities for convenient and safe active travel throughout the Area, linking across separate site allocations and create strong north-south and east-west movement corridors. This should include an east-west connection following existing water courses across Theobalds Park Road and provide

access to Cuffley Brook.

- b. cycle and pedestrian priority streets and routes which permeate all development areas and should connect to existing and proposed surrounding strategic routes. New streets and spaces should be planned to prioritise and encourage walking and cycling, including e-bike infrastructure, and ensure safe, quiet, and healthy living environments.
- c. reducing east-west severance, with two new connections across the railway, and facilitating enhanced east-west green corridors across the north of the Borough. A new pedestrian and cycle connection linking the existing Golf Course and wider connections across Kings Oak Plain should align with new links across Theobalds Park Road into Whitewebbs Wood.
- d. improvements to the environment and facilities for pedestrians and cyclists along the existing road network through the site.
- e. improvements to public transport accessibility through an expanded bus network through working with TfL to achieve their aim of all Londoners living within 400m of a bus stop. Increasing rail service frequencies and better access, public realm, and facilities, including a second entrance, widened staircases,



and lifts, at Crews Hill rail station through working with Govia Thameslink Railway and Network Rail.

- f. improving and extending walking and cycling routes to create an active travel network that links communities with local centres, the rail station, bus service routes, green spaces, and the rural transformation area.
- g. providing new active travel connections along the corridor valleys of Turkey Brook and Cuffley Brook and as an alternative route to Theobalds Park Road
- h. enhancing the London Loop/Green Loop and providing improved / new walking and cycling connections through Hilly Fields Park and the area north of Chase Farm Hospital, to connect to new quiet-ways into Enfield Town.
- i. addressing limitations in the capacity of the existing road network, particularly in accessing land to the west of the railway and including the road passing under the railway near Crews Hill station.
- j. reducing the need for longer distance travel through the creation of local

centres and amenities including co-working spaces and space for home working.

### Social and Community Infrastructure Requirements

- 19. Development proposals should provide necessary social and physical infrastructure ahead of or in tandem with housing delivery, in order to support the comprehensive development of Crews Hill and future stewardship. Facilities and services should be located so as to prioritise active and sustainable travel to them from all parts of the development and also be embedded within the community where appropriate. Key infrastructure requirements include the provision of:
  - a. a multi-functional network of green and blue infrastructure which is easily accessible to new and existing residents, promoting healthy, active lifestyles.
  - b. new riverside public parks along the brooks.
  - c. community orchards and allotments.
  - d. community and health facilities
  - e. two primary schools, each providing two form entries, and a six forms of entry

secondary school, subject to updated need requirements.

- f. a local centre and two local parades located centrally within the new neighbourhood
- 20. The opportunity to incorporate a new Visitors Centre to serve the Borough's rural transformation area should be explored. This could include a mountain biking trail centre, wild swimming lake, art trail, performance space and play features.
- 21. To help establish a strong community, proposals will need to set out the long term governance and stewardship arrangements of the social and community infrastructure (including green and blue infrastructure) and the community development activities appropriate to the creation of a new community. Further detail should be provided in the SPD. Planning obligations will be sought to secure long term funding, maintenance and stewardship of the assets where necessary.

## EXPLANATION

3.159 The proposed site allocations across the Placemaking Area includes sufficient land to enable the creation of a new sustainable community over the long term. Sites anticipated to come forward in the next plan period are also being removed from the Green Belt now as shown on the Policies Map. This will create a new defensible Green Belt boundaries that will endure into the future whilst enabling a long-term comprehensive approach to be taken to development of the Placemaking Area, giving certainty to the overall development capacity and infrastructure needs of the area. This is in accordance with the NPPF September 2023 which sets out in Section 5, Delivering a Sufficient Supply of Homes, how the plan-making process should positively plan to identify appropriate land for homes. It goes further to state that a significant step towards meeting the housing shortage is through larger scale development, such as new settlements or significant extensions to existing villages and towns and that local authorities should identify suitable locations for such development to help meet identified needs in a sustainable way (NPPF para 73).

3.160 Crews Hill will deliver a good proportion of affordable and family homes in a sustainable location – to help contribute

towards meeting a specific need that is not readily achievable within the urban areas, whilst utilising a mixture of previously developed land and lower quality greenfield land in a location well connected to public transport. There is also the potential to accommodate pitches for Gypsy and Traveller accommodation if required (subject to the outcome of the Traveller Local Plan process), with the site being located in good proximity to the strategic road network, which is an important consideration for meeting Gypsy and Traveller needs. Accordingly, development proposals should explore the potential to meet this housing need, subject to existing need as proposals come forward.

3.161 The estimated capacity of 5,500 homes with supporting infrastructure is based on the high-level spatial framework evidence base that has been drawn together. There is scope for further refinement of the framework and for more detailed work to be done to ensure the estimates are robust, deliverable and have been optimised as far as possible, to ensure that the best use is being made of the land if it is to be released from the Green Belt. However, the scale of development will be sufficient to support essential facilities that are required to make a small self-sufficient settlement including a secondary school.

3.162 Mixed use development in this location will support low carbon lifestyles by providing facilities and services in walkable neighbourhoods to support the new community. All homes will be within 800m of a centre with a local centre provided near to the railway station at the heart of Crews Hill, which will help to minimise travel beyond this new community. Two further local parades will be provided to meet local needs to reduce the need to travel by car.

3.163 Crews Hill Railway Station is under-utilised and provides a significant opportunity for enhancing the sustainability of the proposals. Improvement to station facilities and access, along with increased services will improve the attractiveness of using rail. In addition, a further 12,000 homes are planned in and around this railway line both in Enfield (at Chase Park) as well as within Hertfordshire to the north. Using a cross-boundary partnership approach to work together will enable a strategic approach to be taken to upgrading of rail facilities and frequencies on this route. The operator Govia Thameslink are supportive in principle of this ambition, and discussions have commenced with Network Rail who have are supportive of development enabling closure of high-risk crossings, such as the level crossing in the south of the area, and replacement with safer bridge crossings.

The expansion of the existing bus network, linking into the railway station will also enhance the existing network to provide a comprehensive public transport network for all existing and future residents.

3.164 Planning for active travel will need to consider the topography of the site, which will make this type of travel challenging for some. Innovative public transport schemes such as electric bikes should therefore be a considered option, providing appropriate locations for picking-up and dropping-off bikes. The necessary electric vehicle charging infrastructure should also be designed and delivered appropriately, adhering to principles of universal design and clutter free public realm. Vehicle sharing clubs should be encouraged to establish. These less polluting vehicle options should be coupled by planning for clean air zones/car free, especially around the schools.

3.165 The envisaged cycle, pedestrian and bus link over the railway line in the north of the area will be important to provide access to those in the north to the local parade, school and to the centre of the development and to other centres such as Enfield Town and services and facilities. It will also serve as a place of arrival for visitors to the destination landscapes in the wider area through

the provision of leisure, eco-tourism and education facilities and activities. The movement strategy that has been devised aligns with the overall ELP vision of creating a deeply green place – and the associated strategic objectives, as well as the Council's broader Climate Action Plan goals.

3.166 The spatial framework meets current standards for the quantum of green infrastructure. This ensures not only the needs of the new community are met but provides opportunities to integrate with the wider rural green infrastructure as part of the rural transformation area. Developers will be strongly encouraged to develop proposals in line with standards that can assist with sensitively and successfully integrating the development here with the surrounding green infrastructure, drawing these qualities into the heart of the new settlement, in line with vision for Crews Hill. This could include BREEAM communities – a framework to integrate and assess sustainable design in the masterplanning of new communities and/or the Building with Nature framework.

3.167 A central factor of the rationale for considering a new settlement in this location, is the need to deliver more family homes – in a form that is not readily achievable within the urban

areas. As a result, putting children at the heart of the placemaking approach will be an essential component of ensuring the vision can be successfully executed. A new primary school will be required in the North West of the allocation to meet the needs of the new population. A second new primary school may be required in the east of the site, though this will require further testing and maybe outside of the plan period. If required, it could be co-located with the secondary school. The location of the schools ensure the majority of proposed homes will be within 800m of a primary school which reduce the need to travel by car.

3.168 Landscapes and public realm should be designed with playable features in mind – both formal and informal – and road and street networks should facilitate safe and independent travel for young people. This is line with the Mayor's Play and Informal recreation SPG (2012) or any subsequent successors. This will be a place for children today in the future, and opportunities should be taken to creatively co-design key spaces with local communities – with a particular focus on young people. This will help embed a sense of ownership within the local community and begin to foster a framework for community-led stewardship of green and blue and social/community infrastructure as

proposals and development progress. Early years provision and a school will also act as key hubs that work to tie the community together, acting as a focal point within the area.

3.169 The proposed SPD (or any subsequent planning tool) will take forward the design concept set out in the illustrative Spatial Framework (Figure 3.14), to establish an overall coordinated approach to the area, the distribution of land uses, additional design guidance including the approach to design codes, as well as phasing of development and more detailed approach to infrastructure requirements and provision across the CHPA as a whole. The SPD will be produced by the Council in partnership with the developers, landowners, key stakeholders and in consultation with the local community.

3.170 As a minimum the SPD will:

- Illustrate the key structural landscape elements around which the development proposals should be framed;
- incorporate a green and blue infrastructure (GBI) plan which is informed by relevant surveys and baseline evidence, which should include a habitat survey and heritage and landscape character assessments. The

GBI plan should set out a framework and network of spaces to meet strategic and local requirements, including retention of existing green spaces and opportunities for growing food;

- show how the development will incorporate the full range of sustainable transport measures, including dedicated bus service routes, transformation of Theobalds Park Road and Cattlegate Road to support improved walking and cycle movement, parking requirements and key points of access into the development parcels;
- show all intended links to the surrounding footpath and cycleway network;
- set out a comprehensive approach to the phasing of development and on and off-site infrastructure delivery for the Placemaking area as a whole and as necessary to support each phase; and
- set out an approach to stewardship and governance.

3.171 The land is in a number of different ownerships. The Council has been taking a proactive lead in contacting all landowners to engage them in the plan-making process, working in close partnership with key landowners and stakeholders already engaged within the process to build upon existing

community ties. It is essential that the contributions to shared infrastructure requirements are based on an equitable equalisation mechanism that is agreed between parties. An equalisation mechanism to permit development to proceed will need to be agreed by all landowners. The Council has also been convening developers and landowners through a developer forum for the placemaking area to agree such matters.

3.172 Given the complexity of ownership within the Crews Hill area the Council's positive approach to planning may require it to use its compulsory purchase order (CPO) powers under the Town and Country Planning Act 1990 (or any subsequent powers). That power gives the Council a tool to help to assemble land where the authority considers that the acquisition will facilitate development, redevelopment, or improvement of the land, or in the interests of achieving proper planning of an area. CPO powers are a crucial tool in facilitating "regeneration" as demonstrated by the amendment introduced by the Levelling Up and Regeneration Act 2023 which makes clear that 'improvement' of the land includes 'regeneration'. The Council will explore the use of these powers where necessary but, in line with guidance on the use of CPO powers,



will only use this as a last resort. As such the Council will first seek to work collaboratively with landowners to secure the required land to enable the vision for the new settlement at Crews Hill to be delivered. If use of CPO powers is required, and the Council adopt this approach, which it is prepared to do, it will provide developers with the confidence to bring forward schemes through the planning process on their land to facilitate delivery at pace and to commence concurrent discussions with landowners and occupiers on agreements to acquire surrounding interests.

3.174 Development in this location provides a unique opportunity to deliver a strategic scale new settlement served by underutilised sustainable transport connections that can provide for a significant proportion of the Borough's housing needs, both within this Plan period and beyond. Overall, the level of ambition will need to be realised through an exemplary quality proposal, that goes far above and beyond conventional approaches to development in order to justify the release of Green Belt in this location. Through adopting the principles set out in this policy proposals will mitigate harm to the Green Belt in accordance with paragraph 154 of the NPPF through a series of components that will deliver benefits of strategic significance, not just within the placemaking area boundary, but for benefit to the wider area and Borough.

3.175 This will be located in remaining areas of Green Belt.

3.173 The Council has successfully used CPO powers to acquire land for regeneration and to enable delivery of new homes at Meridian Water in the south of the Borough – demonstrating its capacity and commitment to proactively leading and enabling significant large scale regeneration efforts within the Borough. Ultimately, it will be essential that the public and private sector developers collaborate at an early stage to enable the shared aim of bringing forward comprehensive and transformational regeneration.



# 4 Climate Resilience

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# INTRODUCTION

4.1 The 2018 Inter-governmental Panel on Climate Change report has served as a timely reminder of the imperative need for climate change across all levels of governance. Climate change poses severe and enduring social, economic and environmental implications. It is essential to recognise that climate change is inherently linked to issues of social justice. Enfield's geographical layout means that more deprived communities are affected by rising flood risks, and the instabilities associated with a changing climate are expected to disproportionately affect those with limited resources to effectively respond.

4.2 In 2019, Enfield Council made a commitment to address climate emergency by pledging to become a carbon neutral organisation by 2030. Subsequently, in 2020, the Council adopted the Climate Action Plan, setting the ambition for Enfield to be a carbon neutral organisation by 2040. To realise this vision, this chapter outlines the requirements for addressing the energy implications of new developments, reducing waste, and supporting effective adaptation to a changing climate.

4.3 While this chapter's policies emphasise fundamental aspects of sustainability and the transition to net zero carbon development, it is vital to acknowledge that the broader policy framework throughout this plan is equally essential in achieving a sustainable future for Enfield. This includes policies related to sustainable transportation, compact mixed-use neighbourhoods, the public realm and blue and green infrastructure enhancements. Taken together, this policy framework is crucial to creating sustainable places to face the challenges of the twenty first century.



Firs Farm Entrance

## STRATEGIC POLICY

# SE1: RESPONDING TO THE CLIMATE EMERGENCY

The Council will work with partners to:

1. use all planning tools available to meet the 2040 net zero carbon Borough commitments set out in the Climate Action Plan<sup>10</sup>;
2. encourage both established and innovative approaches to tackling climate change, reducing air pollution, managing flood risk and promoting sustainable infrastructure;
3. require high-quality net zero carbon development which maximises fabric efficiency standards and on-site renewable energy generation;
4. prioritise heat decarbonisation, with no new gas connections, ensuring all heating and hot water in proposed development to be provided through low carbon sources;
5. ensure development proposals support and contribute towards the expansion and decarbonisation of the Borough's existing heat network and maximises the deployment of renewable energy;
6. ensure development is designed for resilience in a changing climate, including supporting future adaptability and mitigate the risk of overheating (for example through considering the orientation of buildings and using trees for shading);
7. reduce all sources of flood risk (including through the use of Sustainable Drainage Systems), improve wastewater infrastructure in line with the Council's Infrastructure Delivery Plan;
8. require developments to embed design and operation that is aligned with sustainable waste management in operation, the minimisation of waste and the uplift of recycling targets;
9. embed a circular economy approach to building design and construction to reduce waste, support reuse and minimise embodied carbon, prioritising retrofit first.
10. build on Policies T1, T2 and T3
11. safeguard the role of the natural environment as a biodiverse resource and as a carbon sink;
12. maximise the role of the natural environment in delivering measures to reduce the effects of climate change, including tree planting to moderate heat island effects. Green Infrastructure and resilient ecological networks will play an important role in aiding climate change adaptation; and
13. ensure the character and significance of built and natural heritage is safeguarded whilst maximising opportunities to improve energy efficiency and introduce new energy sources.

<sup>10</sup> <https://new.enfield.gov.uk/services/environment/enfield-climate-action-plan-2020-environment.pdf>



## EXPLANATION

- 4.4 This overarching policy seeks to ensure that all new developments including both residential and non-residential developments actively contribute to reducing carbon emissions. Enfield's Climate Action Plan<sup>11</sup> sets out the Borough's strategic and coordinated approach towards addressing climate change.
- 4.5 The ELP plays an important role in helping the Borough in responding to the climate emergency. It provides the planning framework for mitigating and adapting to climate change with regard to how land is used and managed within Enfield. To achieve this objective and foster energy efficient development, specific carbon reduction targets have been defined, aligning with the energy hierarchy outlined in the London Plan.



Prince of Wales Wetlands

## DEVELOPMENT MANAGEMENT POLICY

### SE2: SUSTAINABLE DESIGN AND CONSTRUCTION

1. All development, including new developments, change of use, conversions and refurbishments, will be required to submit a sustainable design and construction statement. The statement should set out how sustainable design principles have been integrated into a design-led approach; including the consideration of the construction and operational phases of development; and how proposed interventions have been balanced against other constraints, for example heritage significance. The statement should be proportionate to the nature and scale of development proposed with a sufficient level of detail to demonstrate that the relevant policy requirements have been satisfied.
2. Major residential development of ten or more dwellings are required to work towards achieving Home Quality Mark (HQM) 4.5\* with a minimum certification level of 4\*.
3. Non-residential development with a combined gross floorspace of 1,000 square metres floorspace or more must work towards achieving Building Research Establishment Environmental Assessment Method (BREEAM) 'outstanding' with a minimum certification level of 'excellent'.

#### EXPLANATION

- 4.6 This policy outlines our approach for ensuring that sustainable design and construction principles inform new development. Part 1 of the policy relates to all new developments and requires a proportionate sustainable design and construction statement as part of planning applications. For major developments the sustainable design and construction statement should refer to and complement other detailed statements including:
- energy usage, operational and whole-life carbon emissions and reporting, as set out in the energy strategy (see policies SE4, SE5 and SE7);
  - landscape design and urban greening which should demonstrate an integrated approach to both hard and soft landscape design which maximises urban greening, soft landscaping and sustainable drainage measures;
  - air quality considerations, as set out in the air quality impact assessment (see policy ENV1);
  - integrated water management and sustainable drainage, see policy SE9;
  - waste reduction, adaptive reuse and whole-life carbon emissions, as set out in the circular economy statement (see policy SE3); and
- 4.7 Minor developments should include proportionate information on the key aspects mentioned above. This information could be incorporated within a design and access statement. Part 2 of the policy relates to major residential developments and outlines aspirations and minimum requirements using the HQM assessment framework. Part 3 relates to non-domestic development and sets aspirations and minimum requirements using the BREEAM assessment framework. In cases where alternative assessment frameworks have been approved by the local planning authority, developments may have the option to utilise them.
- 4.8 The metrics, targets and standards set out in following policies (SE3, SE4 and SE5) should inform and, if necessary, take precedence over the HQM and BREEAM standards set out here.

## DEVELOPMENT MANAGEMENT POLICY

### SE3: WHOLE-LIFE CARBON AND CIRCULAR ECONOMY

1. All major development proposals will be required to meet objectives set out below through the provision of a circular economy statement. Proposals should prioritise reuse and retrofit of existing buildings wherever possible before considering the dismantling of old buildings and the design of new buildings and minimise environmental impact of materials by reusing materials on-site where possible. Any circular economy statement should meet the criteria set out in London Plan Policy SI7 part B or its subsequent update.
2. Major development proposals are required to calculate whole-life cycle carbon emissions through a nationally recognised whole life cycle carbon assessment tools, in line with London Plan Policy SI 2, or its subsequent update and associated guidance. Developments should demonstrate actions taken to reduce life-cycle carbon emissions with the aim of achieving the upfront carbon targets set out in **Table 4.1**, or higher future standards set by national or regional policy.

**Table 4.1:** Upfront carbon requirements, in accordance with the latest RICS Whole Life Carbon Assessment Methodology (Modules A1-5)

	PLANNING APPLICATIONS BEFORE 1ST JANUARY 2030	PLANNING APPLICATIONS AFTER 1ST JANUARY 2030
Domestic	<500 kgCO <sub>2</sub> e/m <sup>2</sup>	<300 kgCO <sub>2</sub> e/m <sup>2</sup>
Non-Domestic	<600 kgCO <sub>2</sub> e/m <sup>2</sup>	<350 kgCO <sub>2</sub> e/m <sup>2</sup>

#### EXPLANATION

- 4.9 Up to a fifth of carbon emissions associated with UK building stock comes from embodied emissions associated with new builds. Embodied emissions are defined in paragraph 9.2.11 of the London Plan. Even as buildings become more energy efficient, significant emissions are associated with embodied carbon – this source can represent 40-70% of whole life carbon emissions of a low carbon building<sup>12</sup>.
- 4.10 To address this challenge and reduce whole life cycle carbon emissions, this policy seeks to ensure that new development addresses core circular economy principles in a circular economy statement (Part 1).
- 4.11 The Circular Economy Statement could include a materials audit, reviewing the materials which can be salvaged and reused on site. Enfield Council has established the Excess Materials Exchange platform, a means connecting unwanted materials with recipient projects to prevent valuable resources being discarded as waste.
- 4.12 As part of the Circular Economy Statement, developers are encouraged to provide a Circular Index calculation.

<sup>12</sup> LETI (2020)  
Climate  
Emergency Design  
Guide

This is a percentage from 0 to 100 where 100% represents retention of all materials, and 0% represents the use of completely new materials. In the case of demolition, 0% would represent all materials disposed or incinerated. We encourage developers to reach a Circular Index of 50% or above, and scores below 50% require additional justification as part of the Statement.

4.16 Key considerations for understanding the opportunities for retrofitting and reuse include:

- Is a new building necessary to meet the client's brief? If yes, why? Detail space, layout or other requirements vs the existing building configuration
- Has the brief been interrogated against the client's needs, and does it represent the most efficient solution?
- What is the condition of the existing building? Could it be repaired or reused without being demolished?
- Does retention allow the heritage significance of a site or building – or its contribution to local character and distinctiveness – to be preserved and enhanced?
- Can uses be shared or spaces be multi-functional?
- Are there options for the building to be re-configured or adapted in ways which conserve and reuse the most existing embodied carbon?
- Internal reconfiguration
  - Upwards or out-wards extension
  - Strip back to structural core and reuse
  - Reuse foundations

4.13 The Circular Index (%) is calculated as:

$$\text{Circular Index (\%)} = ((\text{kg of new materials} \times 0.1) + (\text{kg of renewable materials} \times 0.6) + (\text{kg of recycled materials} \times 0.6) + (\text{kg of reused materials} \times 0.8) + (\text{kg of materials kept in situ} \times 1.0)) / \text{Total kg of materials}$$

4.14 In line with London Plan Policy, Part 2 requires major developments calculate whole life-cycle carbon emissions. Applicants should evidence how they have taken actions with the aim of meeting the targets set out in Table 4.1 of the policy.

4.15 The targets used derive from LETI (2020) Climate Emergency Design Guide.



## DEVELOPMENT MANAGEMENT POLICY

# SE4: REDUCING ENERGY DEMAND AND INCREASING LOW CARBON ENERGY SUPPLY

1. All relevant developments (those resulting in the creation of one or more dwellings or 500m<sup>2</sup> or more non-residential GIA, including new build, change of use, conversions and major refurbishments) are required to:
  - a. install low carbon heating and hot water, there should be no on-site combustion of fossil fuels for heating. New developments should not be connected to the gas grid, except for in exceptional circumstances.
  - b. provide an energy statement demonstrating how emissions savings have been maximised on site at each stage of the energy hierarchy.
  - c. achieve carbon reduction, as far as possible on-site meeting minimum reductions as set out in parts 2 and 3, or London Plan or subsequent national policy, whichever is higher.
2. All relevant developments (those resulting in the creation of one or more dwellings or 500m<sup>2</sup> or more non-residential gross internal area (GIA), including new build, change of use, conversions and major refurbishments) should maximise energy efficiency, in alignment with 'Be Lean' stage of the energy hierarchy and demonstrate a space heating demand of 15 kWh/m<sup>2</sup>/yr. or less.
3. All relevant developments (those resulting in the creation of one or more dwellings or 500m<sup>2</sup> or more non-residential GIA, including new build, change of use, conversions and major refurbishments) should achieve an Energy Use Intensity (EUI) not exceeding the targets out set in **Table 4.2.**
4. Developments that demonstrate meeting Passivhaus equivalent certification, or subsequent replacement systems, will have demonstrated compliance with this policy.
5. All developments (resulting in the creation of one or more dwellings or 500m<sup>2</sup> or more non-residential gross internal area (GIA), including new build, change of use, conversions and major refurbishments) should aim to achieve net zero energy balance. To reach this objective, developments will be expected to install on-site renewable energy equating to a minimum of 80kWh/m<sup>2</sup>, based on the building footprint (and 120kWh/m<sup>2</sup> for industrial buildings), be met unless it can be clearly demonstrated that this is not practically viable, e.g. on a heavily over shaded site; where this would result in an unacceptable adverse impact upon a heritage asset or its setting; or where there are conflicting spatial limitations. Roof space should be optimised to deliver PVs, Air Source Heat Pumps, and/ or green roofs.

**Table 4.2:** Operational energy use targets

Domestic buildings <sup>13</sup>	35 kWh/m <sup>2</sup> GIA/yr
Industrial buildings and warehouses	35 kWh/m <sup>2</sup> GIA/yr
Schools	65 kWh/m <sup>2</sup> GIA/yr
Offices, Retail, HE teaching facilities, GP surgeries	70 kWh/m <sup>2</sup> GIA/yr
Hotels	160 kWh/m <sup>2</sup> GIA/yr

<sup>13</sup> Including student or keyworker accommodation, care homes or extra care homes

6. All major residential developments of ten or more dwellings and non-residential development of 500m<sup>2</sup> GIA or more will be net-zero carbon. In instances where it can be clearly demonstrated that no further savings can be achieved on-site, due to site constraints or limitations (for example, heritage constraints):

- a. Off-site provision to meet any shortfall is acceptable provided that an alternative proposal is identified, and delivery is certain.
- b. If neither on-site or off-site options are feasible then a cash in lieu contribution to meet net zero operational energy at a rate of £1.32/ kWh may prove acceptable.

Offset calculation formula:

$$\{[SHD \text{ (kWh/m}^2\text{GIA/yr)} + EUI \text{ (kWh/m}^2\text{GIA/yr)}] - EGI \text{ (kWh/m}^2\text{Building footprint/yr)}\} \times \text{£1.32}$$

Where:

SHD: Space heating demand in kWh/m<sup>2</sup>GIA/yr

EUI: Energy Use Intensity in kWh/m<sup>2</sup>GIA/yr

EGI: Electricity generation kWh/m<sup>2</sup> GIA Building footprint/yr

Price of energy: £1.32

7. Major developments (resulting in the creation of ten or more dwellings or 1,000m<sup>2</sup> or more non-residential GIA, including new build, change of use, conversions and major refurbishments) are required evaluate the operational energy use using realistic information on the intended use, occupancy, and operation of the building to minimise any performance gap. They shall demonstrate this through compliance with the above targets using a design for performance methodology such as Passivhaus PHPP<sup>14</sup> or CIBSE<sup>15</sup> TM54 Operational Energy or any updating successors.
8. All major developments<sup>16</sup> shall monitor and report on energy use for five years after occupation.
9. Any new energy centres should prioritise non-combustible, non- fossil fuel energy as the primary heat source. Temporary fossil-fuel primary heat sources must only be installed for a maximum of five years prior to connection to an approved low carbon heat source and interim emissions should be reflected in energy statements and subsequent calculations and offset payments.
10. Development proposals will be expected to address a site's energy infrastructure

requirements, as identified in the Infrastructure Delivery Plan and provide any necessary infrastructure upgrades as required to support the development proposal. Developments should seek to connect to a decentralised energy network where the operator is willing to extend. All such developments shall comply with the Enfield Decentralised Energy Networks Supplementary Planning Document and any updating successor.

11. If connection to a decentralised energy network is not possible, large-scale major developments proposals (200 or more dwellings or 10,000sqm or more non-residential) will be expected to consider the integration of new energy networks in the development, with consideration for future connection to the Borough's heat networks. This consideration shall form part of the development proposals and take into account the site's characteristics and the existing cooling, heat and power demands on adjacent sites where readily available.
12. All major proposals should consider opportunities to incorporate demand response and energy storage technologies.

<sup>14</sup> Passive House Planning Package

<sup>15</sup> Chartered Institution of Building Services Engineers

<sup>16</sup> As defined in Annex 2 of the NPPF

## EXPLANATION

4.17 Net-zero carbon is defined as when the amount of carbon emissions associated with the building's operational energy on an annual basis is zero or negative. A net zero carbon building is highly energy efficient and is powered by renewable energy sources whether they are on-site and/or off-site, with any remaining carbon balance being offset.

4.18 To effectively address the carbon emissions of buildings it is important to minimise energy consumption during building operation. Energy consumption should be evidenced through the provision of an energy statement. Part 2 of the policy aims to reduce space heating demand, while part 3 focuses on reducing operational energy use.

4.19 The Delivering Net Zero report (Etude et al, 2023) defines Energy Use Intensity (EUI) as 'the total energy needed to run a home over a year (per square metre). It is a measure of the total energy consumption of the building (kWh/m2/yr). The EUI of a building covers all energy uses: space heating, domestic hot water, ventilation, lighting, cooking and appliances.'

4.20 The 'UK Housing: fit for the future' report (2019) by the Committee on Climate Change highlights the imperative to build new homes to ultra-

high energy efficiency standards. The report recommends a space heating demand standard of 15-20 kWh/m2/yr, which has informed the 15 kWh/m2/yr requirement set out in Part 2 of the policy.

4.21 The standards outlined Part 3 of the policy relate to gross internal area (GIA), and excludes the contribution made by renewable energy sources.

4.22 The most up to date carbon factors must be adopted for all carbon assessments. Operational energy emissions must be reported in a standardised format, following the GLA's Energy Assessment Guidance and supporting carbon emissions reporting spreadsheet, or its subsequent updates or replacements. Part 5 of this policy indicates that renewable energy generation should be incorporated on site for all new developments. The amount of energy generated in a year should match or exceed the predicted annual energy demand of the building. When this is not technically possible and suitably justified, the applicant should pay into the Council's New Development Carbon Contribution Fund a sum of money equivalent to this shortfall. Based on the current average price and performance of a PV system, and with the addition of a 10% project management fee, an offset price of

£1.32/kWh is required by part 6 of the policy. If off-site provision is considered (in line with London Plan Policy SI2 part C2) the 'alternative proposal' should be located within Enfield. In assessing development proposals, there may be legitimate trade-offs between the use of limited roof-space for renewable energy generation to get to a net zero operational balance, and other policy requirements around climate adaptation, for instance for green roofs to provide habitat, reduce runoff and mitigate overheating. In these instances, flexibility is encouraged and decisions should be made on a case-by-case basis. Where there are conflicts between photovoltaic systems (PVs) and green roofs, decision makers are encouraged to give preference to the latter approach.

4.23 The 'performance gap' in building performance, which is the difference between anticipated energy use and actual performance, is an issue of concern. Parts 7 and 8 of this policy seeks to ensure the reporting of accurate information to inform future policy development, with the goal of closing the performance gap. Part 8 requires major developments to monitor and report their energy usage in line with London Plan paragraph 9.2.10.

4.24 Part 10 of the policy actively encourages the expansion of decentralised energy throughout the Borough. Achieving carbon-neutral development cannot entirely be achieved through building efficiency alone, hence the adoption of zero and low carbon energy generation methods are supported, including connections to decentralised energy networks. Decentralised energy networks have been identified as the cost optimal solution to decarbonising heat in Enfield, aligning with national policy direction such as the DESNZ on Heat Network Zoning, and regional policy direction as outlined in London Plan Policy SI3. At the local level, the Enfield Decentralised Energy Networks Supplementary Planning Document (SPD) supports decentralised energy networks and is further evidenced by the recently completed Local Area Energy Plan (LEAP). Identified heat network priority areas can be reviewed through the London Heat Map <https://maps.london.gov.uk/heatmap/>

4.25 Connection to an existing or future decentralised energy network may can be secured via a legal agreement as part of the planning application. The Enfield Decentralised Energy Network SPD or its subsequent update) provides more detailed technical design guidance relevant to commercial and residential developments, requiring

them to connect to or contribute towards decentralised energy networks. Where appropriate, we will work with infrastructure providers to facilitate the provision of infrastructure (including the safeguarding of routes and sites) to support new and expanding decentralised energy networks. In autumn 2021, BEIS initiated consultations on proposals for the implementation of heat network zones. The aim of the project is to develop heat networks in zones where they can provide the lowest cost low carbon heat to the end-consumer through regulation, mandating powers, and market support. Enfield has been selected as a pilot for the heat network zones project and may inform subsequent policy in respect to heat networks.

4.26 Enfield's ability to achieve Net Zero will ultimately depend on the decarbonisation of electricity consumed within the Borough, thereby replacing the direct use of fossil fuels for transportation and heating. The decarbonisation of Enfield's electricity use will be largely dependent on the rate of decarbonisation of the whole electricity system in Great Britain. Scenarios produced by the National Grid and Committee on Climate change set out possible trajectories for the decarbonisation of the grid. Enfield's has adopted a decarbonisation pathway

in line with the National Grid's 'consumer Transformation' scenario. Zero carbon grid electricity is achieved in the early 2030s, slightly ahead of the UK Government's 2035 target.

4.27 If the grid is to decarbonise, and Enfield is to achieve its net zero target, then opportunities for increasing locally-generated power need to be exploited to a much greater extent than they currently are. Based on the most recent available data, around 0.003% of Enfield's electricity demand was matched by renewable generation within its own boundary in 2020. Given the largely urban nature of the Borough, scope for developing large-scale renewable energy projects is relatively limited rooftop solar PV considered to have the greatest potential within the borough. This is supported by Part 5 of the policy.

4.28 The demand for power is expected to increase across the Borough as part of the transition towards achieving a decarbonised future. This will require a need to effectively manage both demand and supply of power. Flexible solutions such as battery technology or smart charging, involves shifting charge events to period when there is a lower overall demand on the electricity system, or higher levels of renewable energy generation. Such measures can help ease the total power demand on the electricity network, potentially avoiding the need for costly upgrades to network infrastructure and offering electricity consumers the potential for lower cost energy. These types of technologies support the shift towards electrification, which is required to decarbonise the Borough.



## DEVELOPMENT MANAGEMENT POLICY

# SE5: RENEWABLE ENERGY DEVELOPMENT

1. In determining planning applications for renewable and low carbon energy, and associated infrastructure, the following issues will be considered:
  - a. the contribution of the proposals to cutting greenhouse gas emissions and decarbonising our energy system.
  - b. local amenity, including appropriate stand-off distances between technologies (e.g. wind turbines) and sensitive uses;
  - c. impacts, including cumulative impacts on the built and natural environment, having regard to its proximity to sensitive receptors (including designated and non-designated heritage assets, high quality landscapes such as river valleys, reservoirs and regional parks, parts of the urban fringe and strategic views from the Green Belt, areas of special character and areas of Metropolitan Open Land);
  - d. suitable mitigation measures to minimise, offset and overcome any adverse impacts;
  - e. scope to reclaim the land to a suitable and safe condition and use (e.g. agriculture or nature conservation) once it ceases to operate; and
  - f. direct benefits to the area and local community. Particular support will be given to renewable and low carbon energy generation developments that are led by or meet the needs of local communities.

## EXPLANATION

- 4.29 This policy actively promotes the generation of renewable energy. Generating renewable energy plays a crucial role in helping to decarbonise the electricity supply, a key element in achieving carbon neutral development. The effectiveness of energy efficiency policies in the ELP can only take us so far.
- 4.30 According to the Committee on Climate Change (2023), their proposed pathway towards achieving a decarbonised energy system envisages that 70% of the country's energy is supplied by renewable sources by 2035<sup>17</sup>. Establishing a positive framework for the development of renewable energy is essential to support the process of decarbonising the energy system.
- 4.31 The primary goal of this policy is to ensure that potential negative impacts can be avoided or effectively mitigated, so that the scope for renewable energy to meet Enfield's needs can be optimised.
- 4.32 Furthermore, this policy encourages the integration of renewable energy generation with other forms of development, such as the installation of solar photovoltaics (PVs) over car parks.

<sup>17</sup> Committee on Climate Change (2023) 'Delivering a reliable decarbonised power system,' page 53

## DEVELOPMENT MANAGEMENT POLICY

### SE6: CLIMATE CHANGE ADAPTATION AND MANAGING HEAT RISK

1. Developments will be required to:
  - a. provide adequate mitigation measures to minimise overheating including landscaping, tree planting and the use of blue-green infrastructure; and
  - b. optimise the layout, orientation, materials, technology and design of buildings and spaces to minimise any adverse impacts on internal and external temperature, reflection, overshadowing, micro-climate and wind movement.
2. Major developments must undertake overheating assessments in line with the cooling hierarchy set out in the London Plan (or any successor plan) taking account of future climate change. Developments are required to undertake a detailed analysis of the risk of overheating and submit evidence as outlined as set out in GLA's Energy Assessment Guidance or its subsequent update.
  - a. Applicants will be expected to demonstrate how passive measures have been optimised from the outset to reduce overheating risk (e.g. form, orientation, glazing ratio).
  - b. External and passive shading will be expected to form part of major proposals – and should be demonstrated to be considered for the purpose of meeting overheating standards prior to active or user-reliant systems being proposed (e.g. boost ventilation, internal blinds or active cooling).
  - c. All modelling shall also be assessed against 2050 local weather files in addition to the current version of local data and extreme scenarios.
  - d. The energy statement should include a description for considerations for future resilience including opportunities for adaptation.

#### EXPLANATION

- 4.33 Climate change is expected to increase the severity and frequency of extreme heat events in the Borough. The escalating concern regarding heat risk is becoming an increasingly important issue, particularly in the context of a growing population and the effects of global climate change. This policy requires all new developments to be designed to effectively manage heat risk, address internal and external temperatures and improve human comfort.
- 4.34 Under this policy, development proposals should address the cooling hierarchy outlined in the London Plan to mitigate overheating and avoid reliance on air conditioning systems. The cooling hierarchy includes a range of measures such as passive ventilation, active low-carbon cooling systems, mechanical ventilation, energy efficient design, higher ceilings, shading, and green infrastructure, all of which contribute to reducing internal temperatures. The use of blue-green infrastructure and urban greening as sustainable cooling options for both internal and external environments is strongly encouraged.

4.35 To properly assess risks of overheating, applicants should refer to the latest Chartered Institution of Building Services Engineers (CIBSE) guidance on assessing and mitigating the risk of overheating in new developments, which includes TM59 for domestic development and TM52 for non-domestic development. It is also essential to reference the Mayor of London's Energy Planning Guidance or its subsequent updates.

4.36 Severe hot weather conditions can discourage outdoor activities and physical engagement. Consequently, developments are expected to be designed in a way that promotes a comfortable environment, with shaded areas integrated into the public realm and indoor amenity spaces designed to be cool and well-ventilated. If necessary, contributions to cooling measures for spaces and streets beyond the development's boundaries may be appropriate. This could, for example, enhance the comfort and appeal of the public realm for walking and cycling in line with the healthy streets approach set out in the London Plan.

4.37 All major development proposals will be required to submit an energy statement, clearly outlining how measures at the higher end of the cooling hierarchy have been prioritised and considered into the design-led approach. Proposals that use measures at the lower levels of the hierarchy will be resisted, unless there is evidence to demonstrate that this is necessary, for example, for reasons due to technical feasibility.

4.38 Recognising that the feasibility of measures should be commensurate with the nature and scale of development, it is acknowledged that minor developments, particularly householder extensions, may have limited opportunities to implement certain measures from the upper tiers. Nevertheless, developers should investigate potential measures and incorporate these wherever possible. The cumulative beneficial impacts of smaller developments can help mitigate the urban heat island effect. Therefore, the loss of established soft landscape features without replacement will be resisted in all cases and the introduction of new soft landscaping will be encouraged, wherever possible.



Firs Farm pond dipping

## DEVELOPMENT MANAGEMENT POLICY

# SE7: MANAGING FLOOD RISK

1. New development must avoid and reduce the risk of flooding and not increase flood risk elsewhere. New development must:
  - a. assess the risk of flooding from all sources including fluvial, surface water, groundwater, sewer and reservoir as identified in the Strategic Flood Risk Assessment (SFRA) or any subsequent reviews/updates of the evidence base on flooding;
  - b. be appropriate according to its flood risk vulnerability classification (as defined in the Technical Guidance to the National Planning Policy Framework);
  - c. be designed to be safe for a 1% annual exceedance probability (AEP) event with the appropriate allowance of climate change; and
  - d. be appropriately located (according to the sequential test) and informed by a site-specific Flood Risk Assessment (FRA).
2. Site-specific groundwater flood risk assessments will be required for proposals at risk of groundwater and / or include below ground elements.
3. Development proposals (including change of use) that require a site-specific Flood Risk Assessment (FRA) should be prepared in accordance with the latest SFRA. In addition, groundwater flood risk assessment may be required where basement level development is proposed. Feasibility of the development should ensure that all opportunities to avoid and reduce flood risk are identified and maximised; this should include early engagement with the Lead Local Flood Authority (LLFA).
4. All new development at risk of flooding must:
  - a. preserve overland flood and flow routes, where applicable;
  - b. ensure no net loss of flood storage on site for both fluvial and surface water flood risk, or in exceptional circumstances, provide adequate offsite compensatory storage;
  - c. demonstrate that it will be safe throughout its lifetime, taking into account the vulnerability of its users, which includes the provision of flood warning arrangements and evacuation plans;
  - d. maintain or provide new or upgraded flood infrastructure at a sufficient standard of protection and/or provide a financial contribution towards measures which reduce and mitigate against flood risk;
  - e. incorporate flood resilient and flood resistant design measures where there is residual risk;
  - f. apply appropriate construction techniques to limit potential disturbance to natural groundwater flows (for example, where basements or deep strip foundations are proposed), such as the use of drainage measures or piled foundations;
  - g. where the development is for essential infrastructure, the measures must ensure that the site is designed to remain operational when floods occur;
  - h. manage surface water as part of all development to minimise run-off through sustainable drainage systems; and
  - i. prevent the loss of permeable surfaces/ areas of soft landscaping and maximise the use of blue-green infrastructure as potential sources of flood storage.



5. Where applicable, evidence must be provided so that we can ensure requirements of the sequential test of sites across the Borough has been met and, where an exception test is required, demonstrate that:
  - a. the development would provide wider sustainability benefits to the community that outweigh flood risk;
  - b. the development is on developable previously developed land or, if this not the case, that there are no reasonable alternative sites on developable previously-developed land; and
  - c. the development will be safe without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.
6. Developments that are subject to or result in unacceptable levels of flood risk on site or increase flood risk to third parties will not be permitted due to being deemed unsafe. This includes changes of use (to more vulnerable uses), householder developments (such as extensions, basements and retaining walls) and redevelopment of brownfield sites. In some cases, permitted development rights may be removed as described in the SFRA. Proposals will be refused which provide an unacceptable standard of safety.
7. Developments in proximity to culverts and watercourses should have a minimum of 8 metre set back (unless otherwise agreed with the Environment Agency, LLFA, Thames Water and the Canal and River Trust) with a means to facilitate river naturalisation, ecological enhancements and de-culverting, which improves maintenance of land drainage, enhances local amenity and improves the ecological function of river corridors. If less than 8 metres is proposed, this must be robustly justified and evidenced.
8. Development must assess, protect and improve groundwater quality, particularly where it occurs within an inner source protection zone (as shown on the Policies Map) or on sites where historic contamination is likely to present a significant risk to groundwater.

## EXPLANATION

4.39 The number of properties at risk of flooding is high compared to most other local authorities across the country, due to the large network of watercourses in Enfield, which form a key part of its landscape. These watercourses drain from the western part of the Borough to the River Lee that flows down the eastern part of the Borough, which was historically an area of marshland. The underlying pattern of geology and the effects of urbanisation mean that Enfield is susceptible to fluvial, surface water and groundwater flooding. Careful consideration of site specifics (exact development usage and vulnerability classification), engagement with stakeholders, flood risk studies and potential mitigation measures are all methods which may allow development. Although groundwater flooding is considered to be low relative to fluvial and surface water flooding, large parts of the Borough experience localised groundwater flooding, which can be exacerbated by the development of basement levels. Therefore, groundwater flood risk assessments will be required where basement levels are proposed, as set out in the SFRA.

4.40 Enfield's drainage infrastructure consists of separate surface water and foul water drainage systems and as well as large open watercourses and drainage ditches. Most surface water outfalls into the nearest watercourse. Consequently, a range of flood risk solutions are required to manage flooding from all types of sources and ensure Enfield's residents and workers are not faced with unacceptable risks of disruption.

4.41 New development should be located appropriately to avoid risks of flooding from all sources as directed by the SFRA and NPPF. The policy criteria above will also ensure developments reduce the causes of flooding.

4.42 All developments, including change of use, must prepare a site-specific Flood Risk Assessment (FRA) in line with the guidance set out in the SFRA. In some cases, developments in flood zone 1 may be subject to the 1-in-100 year plus climate change flood extent. Assessing flood risk should also include the potential for blockages in culverts and overland flow routes.

4.43 Applying the sequential test and exception tests is crucial in directing development to areas with lower risk, unless there is a clear justification for an alternative higher risk location. Development in areas subject to flood

risk will only be acceptable provided the development is safe throughout its lifetime, provides wider sustainability benefits that outweigh flood risk, and no reasonable alternative sites on developable land exists. Where climate change is expected to increase flood risk in developed land, relocation opportunities must be sought, in line with the NPPF.

4.44 If the sequential test shows no suitable alternative sites in lower flood risk areas, and development is required, the most vulnerable elements of a development should be located in the lowest risk parts of the site.

4.45 To be classed as 'safe', the development must adhere to the following criteria:

- It should provide a dry access route above the flood level representing 100-year plus climate change scenario or, where appropriate modelled data exists, an access route within the "very low hazard" floodplain area<sup>18</sup> to and from any residential development; and
- Finished floor levels should be elevated at least 300mm (for fluvial flooding) or 150mm (for surface water flooding) above the flood level associated with a 1% Annual Exceedance Probability (AEP) plus climate change event. This should be achieved without increasing

flood risk elsewhere, with the condition there is no net loss of flood storage and overland flow routes remain unobstructed. Consequently, basement levels will not be permitted in areas subject to fluvial and surface water flood risk.

4.46 Flood resilience is a design measure that reduces the damage to buildings from flooding. Examples of flood resilient design measures include raising electrical circuits and other services and using appropriate floor and wall coverings. Flood resistance measures aim to prevent flood waters from entering properties, including the installation of flood-proof air brick covers, closed cell insulation and non-return valves for drainage systems.

<sup>18</sup> Environment Agency's Flood Risk Assessment Guidance for New Development R&D Technical Report FD2320)



Volunteer planting at Pymmes Park Wetlands

- 4.47 The flood mitigation measures employed must have regard to any specific measures identified in SFRA (at levels 1 and 2), the Local Flood Risk Management Strategy, and the Infrastructure Delivery Plan, taking into account any capacity-related issues.
- 4.48 In some cases, developments may be located in sensitive catchment areas or may remain exposed to residual flood risk. In these cases, a financial contribution will be required to support offsite flood mitigation measures, in line with the Infrastructure Delivery Plan and SFRA.
- 4.49 Development proposals must provide a sustainable drainage strategy as required by policy DM SE9, to demonstrate that the development will not increase flood risk. In some cases, it may not be possible to meet the criteria for safe development. This may be considered acceptable, as an exception to the normal rules, for developments involving changes of use in existing buildings where no viable alternatives are available. In this situation, an evacuation plan must be prepared to demonstrate the following:
- An access route within the “danger for some” or “danger for most” floodplain area (as defined by FD2320) is available to and from the development.
  - Appropriate flood resistance and resilience measures have been employed.
  - A safe, dry refuge area is available at all times (for example, if the ground floor is classified as unsafe, the refuge area should be located on an upper floor).
  - A safe access route in the “very low hazard” area of the floodplain (as defined by FD2320) will be available no longer than 24 hours after the onset of the flooding for a 1 in 100-year plus climate change event.



Pocket Park at Haselbury Road

## DEVELOPMENT MANAGEMENT POLICY

### SE8: PROTECTION AND IMPROVEMENT OF WATERCOURSES

1. Development adjacent to, or within close proximity to the Borough's network of watercourses will be expected to:
  - a. be adequately set back from the watercourse (open or culverted) to allow for maintenance, river restoration and habitat enhancement. The distance applied will be determined having regard to the nature of the development and the type of watercourse subject to further consultation with the LLFA, Environment Agency, Thames Water and the Canals & River Trust;
  - b. not involve the culverting or loss of any watercourse;
  - c. not adversely affect any waterway infrastructure, which could result in increased flood risk, land instability and/or inhibit navigation;
  - d. involve the de-culverting of a watercourse where it is deemed appropriate from consultation with the LLFA; and
  - e. enhance the ecological, flood risk, water quality aesthetic and amenity quality of the watercourse and apply the objectives of the Thames River Basin Management Plan.
2. Development on or adjacent to watercourses must not:
  - a. result in deterioration in a watercourse; or
  - b. prevent its ability to achieve the objectives in the Thames River Basin Management Plan.
  - c. Where possible, it should also implement the mitigation measures identified in Thames River Basin Management Plan.
  - d. Have an adverse impact upon the amenity value of the watercourse, including its character and heritage significance
3. Development on any land required for current and future flood management, which would adversely affect the delivery of flood defence schemes, will be refused
4. Where a Water Framework Directive assessment is required to undertake some works on or adjacent to a watercourse, the developer will need to contact the Environment Agency and provide evidence to demonstrate that the above requirements can be met or to otherwise justify the development.

#### EXPLANATION

- 4.50 The failure of flood defences could have severe consequences and pose a risk to life and property. Therefore, the protection of these assets is imperative. Consequently, new developments should maintain a set back from defences and watercourses to ensure that there is adequate space and accessibility for future maintenance. Development should also be set back from watercourses to preserve their settings, prevent the overloading of banks and to minimise the risks to the development.
- 4.51 Failure of flood risk management infrastructure, such as raised defences and culverts, can lead to rapid inundation of the areas protected by these defences, yielding unexpected and catastrophic results. It is preferable to adopt more sustainable practices, including the restoration of river corridors that provide more space for rivers to flow and flood naturally, adopting a catchment based approach.
- 4.52 The naturalisation of watercourses releases the potential for additional waterflow and flood storage capacity while simultaneously providing amenity and biodiversity value. Developers should explore opportunities for the de-culverting of existing watercourses, with a general presumption against further culverting.



## DEVELOPMENT MANAGEMENT POLICY

# SE9: SUSTAINABLE DRAINAGE SYSTEMS

1. A Sustainable Drainage Strategy will be required for all major developments or those where the inclusion of Sustainable Drainage Systems are necessary to demonstrate how the proposed measures manage surface water as close to its source as possible and follow the drainage hierarchy in the London Plan. All developments must maximise the use of and, where possible, retrofit Sustainable Drainage Systems (SuDS) which meet the following requirements:

### Suitability

2. SuDS measures should be appropriate having regard to the proposed use of site, site conditions/context (including proximity to Source Protection Zones and potential for contamination) and geology. In accordance with SuDS good practice guidance<sup>19</sup>, developments must aim to maximise source control SuDS measures.

### Quantity

3. All major developments must achieve greenfield run off rates (for 1-in-1 year and 1-in-100-year events with the allowance of climate change or achieve Qbar if one control is employed).

4. All other development should achieve as close to greenfield run off rates as possible and must maximise the use of SuDS, including source control SuDS measures resulting in net improvement in water quantity and quality.

5. For developments discharging directly to watercourses, greenfield runoff rates will not always be the optimal solution in terms of managing flood risk at catchment scale. An appropriate discharge rate must be agreed with the LLFA. Achieving greenfield runoff rates for lower order events (e.g. the 1-in-2 year event) can ensure water quality and other benefits are still achieved.

### Quality

6. All developments must have regard to best practice and follow the SuDS management train by providing a number of treatment phases corresponding to their pollution potential and the environmental sensitivities of the locality. As part of the SuDS management train, source control SuDS measures such as rain gardens, green roofs, permeable surfacing etc. must be utilised across the whole site to capture the first 5mm of rainfall to minimise the mobilisation of silts and contaminants.

7. Measures should be incorporated to maximise opportunities for sustainable development, improve water quality, biodiversity, local amenity and recreation value.

### Functionality

8. The system must be designed to allow for flows that exceed the design capacity to be stored on site or conveyed off-site with minimum impact. Clear ownership, management and maintenance arrangements must be established.

### Other

9. Where appropriate, developments must incorporate relevant measures identified in the Local Flood Risk Management Strategy<sup>20</sup>.
10. The criteria above must be demonstrated through the submission of a SuDS strategy at full planning application stage.
11. Developments must consider SuDS provision in the earliest phases of the design process as the SuDS strategy affects the layout of the development and has a direct effect on landscaping, urban greening and biodiversity.

<sup>19</sup> <https://www.gov.uk/flood-and-coastal-erosion-risk-management-research-reports/update-to-the-suds-manual>

<sup>20</sup> <https://new.enfield.gov.uk/services/environment/flooding-information-local-flood-risk-management-strategy-2016.pdf>

## EXPLANATION

- 4.53 Effective surface water management plays a vital role in reducing the risks associated with flooding, pollution and other forms of environmental damage.
- 4.54 Given that every part of the Borough either falls within an area at risk of flooding or is located upstream of such area, any form of development has the potential to increase the risk of flooding further downstream in the catchment. Even minor developments, such as changes in land use or modifications to individual properties, contribute significantly to the overall runoff characteristics within a given catchment when their cumulative effects are considered. Consequently, all developments must maximise the use of Sustainable Drainage Systems (SuDS), including previously developed sites.
- 4.55 Sustainable Drainage Strategy will be required for all major developments, as well as some other forms of developments. The Council has developed two SuDS proformas which are designed to assist developers in identifying the necessary SuDS measures based on the scale of development. Additionally, all developments must make every effort to retain and enhance permeable surfaces, flood storage and flow routes to mitigate possible increases in flood risk

elsewhere. SuDS should be provided on site so that they are managed as part of that development in accordance with the drainage hierarchy set out in the London Plan.

- 4.56 The selection of SuDS measures must be appropriate to the site and the nature of the proposed development and/or operations. Factors such as local geology, sensitive groundwater supply areas (e.g. Source Protection Zones) and the pollution potential associated with certain uses may constrain the ability of a site to rely on full infiltration. However, this should not deter the implementation of SuDS. It is possible to design solutions that capture the key benefits of SuDS, namely flood risk

**Table 4.3:** Sustainable drainage system - proformas

Minor	<ul style="list-style-type: none"> <li>Householder developments (e.g. extensions, crossovers, minor outbuildings, change of uses)</li> <li>Minor developments up to one unit, or with a footprint of less than 250m<sup>2</sup></li> </ul>
Other	<ul style="list-style-type: none"> <li>Minor developments two units or more, or with a footprint of 250m<sup>2</sup> or more<sup>21</sup></li> <li>All major developments</li> </ul>

management and pollution mitigation, for any type of development, regardless of ground conditions. This can be through the use of measures such as impermeable liners where required. Developers must use information on local conditions, including the SFRA, SWMP, LFRMS, and information held by other organisations to inform/justify their selection of SuDS measures. Developers should also note the potential need for an Environmental Permit for discharging surface water run-off and are encouraged to undertake pre-application engagement with the relevant bodies and organisations<sup>22</sup>.

- 4.57 SuDS policies at the national, regional and local levels encourage the multiple benefits offered by green infrastructure. These benefits include water quality improvement, biodiversity enhancement, amenity provision, air quality improvement, noise pollution reduction, and mitigation of the urban heat island effect. Such benefits contribute not only to public health and wellbeing but also to environmental enhancements. To facilitate effective delivery, efficient use of available space, and maximise the overall benefits, SuDS should seamlessly be integrated into landscaping schemes. Almost all landscaped features have the potential for above ground storage. Well-

<sup>21</sup> In cases where developments of 2 or more units are likely to have a significant impact on surface water drainage, the more detailed proforma should be utilised

<sup>22</sup> Further guidance on environmental permits can be found at: <https://www.gov.uk/guidance/discharges-to-surface-water-and-groundwater-environmental-permits>

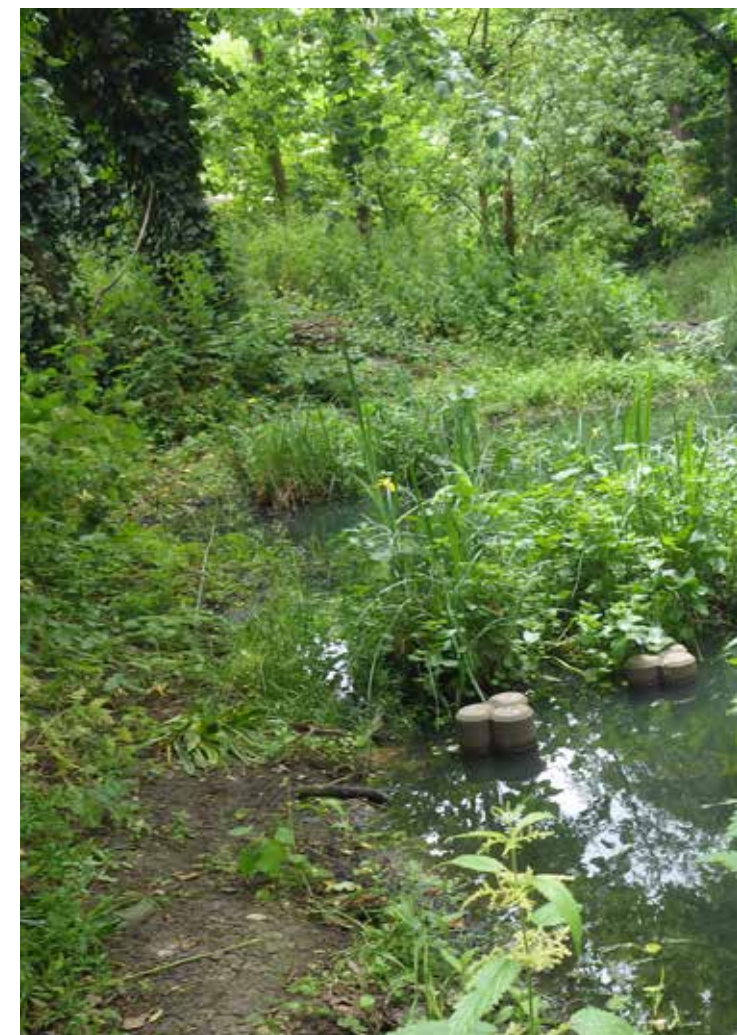
designed SuDS can also contribute to a development's fulfilment of the London Plan's urban greening factor and open space requirements.

- 4.58 To maximise SuDS performance, it is important to follow the principles of a SuDS management train. This term describes a series of SuDS components used in sequence to treat, store and control runoff. Source control SuDS measures such as rain gardens, green roofs and permeable paving, form part of the "treatment" component of the management train and should be utilised for the majority of the hardstanding and roof runoff produced on-site. These features should be designed to capture the first 5mm of rainfall and improve the water quality of the runoff generated on-site. "Pipe-to-pond" solutions where runoff is directed straight into a storage feature without passing through a source control measure should be avoided, as this often results in polluted and silted storage features which pose management problems. This also means that source control SuDS measures should be utilised upstream of proprietary treatment measures (e.g. petrol interceptors) as part of the treatment component of the SuDS management train. Depending on the pollution potential and environmental sensitivities of the site, some

developments may require a series of treatment components. Effective maintenance of SuDS is essential, and keeping SuDS above ground can simplify maintenance issues. Examples of above ground SuDS features include basins, ponds, green roofs, permeable surfaces, water butts and swales. When such features are maintained above ground, any problems that do arise are generally obvious and can be remedied using standard landscaping practices.

- 4.59 Situations may arise where an offsite contribution towards SuDS measures and flood alleviation will be required, particularly where developments fail to achieve policy requirements or are located in sensitive catchments.
- 4.60 SuDS designs should be in accordance with best practice guidance, such as the SuDS Manual, DEFRA's Non-Statutory technical standards and Enfield's Design and Evaluation Guide<sup>23</sup>.

<sup>23</sup> Further guidance on drainage strategies can be found on our website at <https://new.enfield.gov.uk/services/planning/sustainable-drainage-systems/> along with the SuDS proformas for minor and major developments.



Glenbrook SuDS





# 5 Addressing Equality and Improving Health and Wellbeing

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# INTRODUCTION

- 5.1 This section outlines policies aimed at creating healthier places and reducing inequalities across the Borough, aligning with the objectives in the Enfield Health and Well Being Strategy, Enfield Transport Plan, Blue and Green Strategy and London Plan.



Bury Lodge Wetland

## STRATEGIC POLICY

# SC1: IMPROVING HEALTH AND WELLBEING OF ENFIELD'S DIVERSE COMMUNITIES

1. Development proposals will be expected to plan for and contribute towards healthy and active lifestyles and include measures to reduce health inequalities through the provision of:
  - a. access to sustainable modes of travel, including safe cycling routes, attractive walking routes and easy access to public transport, to reduce car dependency;
  - b. access to green infrastructure, including blue corridors, open spaces and leisure, recreation and play facilities to encourage physical activity;
  - c. access to local community facilities, services and shops, which encourage opportunities for social interaction and active living;
  - d. access to local healthy food opportunities, allotments and food growing spaces;
  - e. an inclusive development layout and public realm that considers the needs of all, including groups with relevant protected characteristics such as the older population and disabled people; and
  - f. active design principles which support wellbeing and greater physical movement as part of everyday routines.
2. The following categories of developments should submit a health impact assessment showing how they will address any adverse health impacts and contribute to improving the health and well-being of the Borough:
  - Residential developments comprising 50 or more units;
  - Major and strategic development within areas of poor air quality<sup>21</sup>;
  - Education, health, leisure and community facilities of more than 250 sqm gross floor area; and
  - Where significant impacts are identified through the health impact assessment, measures to mitigate the adverse impact of the development should be incorporated within the proposed scheme and, where possible, achieve positive gains (taking account of the priorities set out in the Enfield Health and Wellbeing Strategy and any updating successor).



<sup>21</sup> As set out in the Air Quality Assessment.

## EXPLANATION

- 5.2 Health and wellbeing are cross-cutting themes, interlinked with many other parts of the ELP. Our environment significantly influences the health and wellbeing of individuals. The planning system plays a key role in enhancing the physical and mental wellbeing of the community. A healthy environment can promote wellbeing, encourage healthy lifestyles for all, and contribute to reducing health inequalities.
- 5.3 Like in other parts of London, Enfield faces a range of health inequalities, such as rising obesity rates and an increasing prevalence of chronic illnesses like diabetes, heart failure and dementia. Although the overall life expectancy is higher than the London and national average, the gap between deprived and more affluent neighbourhoods in the Borough continues to widen.
- 5.4 Health impact assessments (HIAs) are designed to screen and test the health implications arising from proposed development, particularly on vulnerable groups. They recommend measures for mitigating and enhancing these impacts. HIAs should follow the recommended guidance set out in the latest Healthy Urban Planning Checklist (Healthy Urban Development Unit). The checklist should be used at the earliest possible stage of the planning process to inform

the design, layout and composition of the proposed development including ongoing management or monitoring arrangements. The level of detail required will depend on the scale, nature and location of the proposed development.

- 5.5 The list set out in part 2 of the policy is not exhaustive. There may be other categories of development where HIAs are required within an Environmental Impact Assessment (EIA) under the appropriate regulations, particularly if it would affect sensitive or vulnerable populations.
- 5.6 New development proposals are required to contribute towards funding infrastructure and services to meet the needs arising from new development. Infrastructure to help improve the health and wellbeing of Enfield's residents is expected to be delivered on-site as secured by S106 obligations. Suitable off-site or financial contributions will be sought to address the needs arising from the development, ensuring that proposals meet the objectives set out in part 1 of the policy.



Rain Garden - London Road North



## DEVELOPMENT MANAGEMENT POLICY

# SC2: PROTECTING AND ENHANCING SOCIAL AND COMMUNITY INFRASTRUCTURE

1. Development involving the loss or release of a community building or use to other uses will not be supported unless evidence can be provided as part of the planning application to demonstrate the community building has been:
  - a. offered to the market for the range of existing lawful uses (typically non-residential institutions, such as places of worship, schools and community halls) over a 12-month period, at a market rent or sale price benchmarked against other equivalent properties in the area;
  - b. declared surplus to requirements where the loss, or partial loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to sustain and improve services or to meet future population needs;
  - c. shown to be unsuitable in size and scale to its location which already has good access to facilities which meet similar local needs where these arise; and
  - d. the opportunities to share the use of the existing site or co-locate services have been fully explored and are shown to be impractical.
2. New community facilities should:
  - a. be located within or adjacent to the Borough's designated town centres (as shown on the Policies Map) and neighbourhood shopping parades, unless they are within walking distance of public transport, pedestrian and cycling routes or form part of a recognisable or planned cluster/hub of community facilities or are embedded within the communities they serve.
3. New or improved community facilities should:
  - a. be outward-facing, creating a strong active frontage which is not set back from the street so that they are welcoming, safe and inclusive; meet the identified or future local need;
  - b. optimise the use and capacity of the site;
  - c. avoid the loss of housing and employment floorspace and significant harm to the amenities of neighbouring properties and uses;
  - d. operate as a multifunctional space offering fair and affordable access to the public (including protected groups) and sufficient capacity/flexibility to meet a range of needs (e.g. shared spaces or co-located uses), especially outside of core hours; and
- e. put in place appropriate maintenance and management arrangements, taking account of the needs of other infrastructure providers.
4. Developer contributions will be sought towards new school places to meet the needs arising from new housing development (excluding care homes), taking account of available capacity within existing schools and the number of pupils it will generate, from early years through to secondary education. New or expanded schools for larger sites will be expected to incorporate specialist provision where demand exists and make reasonable adjustments to support the needs of the disabled and mobility impaired. In exceptional circumstances, a contribution towards off-site outdoor play space will be accepted in the vicinity of the school in lieu of on-site provision. These provisions and contributions will be captured through Planning obligations.
5. Developer contributions will be sought towards additional health and social care facilities, taking account of the latest strategic health needs assessment, pharmaceutical assessment and relevant NHS strategies and discussions with relevant organisations.



## EXPLANATION

5.7 This policy aims to ensure that new or enhanced community facilities are provided in association with development. The goal is to meet the changing demands and identified needs of the Borough's growing population. Ideally, these facilities should be located near defined town centres (in chapter 10) and other easily accessible locations, such as public transportation corridors. In the context of this policy, community provision includes:

- educational and training facilities;
- healthcare amenities;
- children's play areas;
- places of worship;
- burial grounds;
- libraries;
- pubs and cultural establishments; and
- services related to community safety and security, such as police and emergency services.

5.8 Proposals involving the loss of an existing community use will be resisted, except in exceptional circumstances, as set out in part 1 of this policy. In cases where the loss of a community use can be justified, the applicant will need to explore the opportunity to accommodate an alternative community use which would better meet local needs, in line with relevant strategies.

5.9 Community facilities should be designed to operate as flexible and multi-purpose spaces capable of accommodating a range of uses and activities tailored to suit the needs of diverse groups, organisations and individuals. These facilities should also be accessible to all users and designed to be visible from the street, which includes having active frontages and welcoming entrances facing the public realm.

5.10 Where appropriate, planning obligations will be sought to secure new and improved community facilities, suitably located in the Borough to mitigate the impact of new development, as defined in part 2 of this policy. Estate regeneration schemes and other major developments are expected to provide essential services (e.g. health, educational and childcare facilities) on-site or within close proximity, easily accessible by walking such as a neighbourhood shopping area to meet the needs arising from the new occupants.

5.11 All major developments that involve the provision of community facilities (e.g. secondary schools and primary healthcare centres) must optimise the use of the site through a design-led approach. Developers will be expected to test the feasibility of innovative design options, such as multi-storey buildings, above ground floor level outdoor social spaces, flexible spaces and the co-location of community facilities (e.g. early year facilities within primary school sites and active ground floor units along the main streets).

5.12 New educational facilities, including specialist provision, are expected to comply with relevant guidance from the Department for Education, Sport England and other relevant national governing bodies. Planning applications will need to include details of the indicative catchment area of the proposed school and provide an assessment of the impact of the scheme on the local highway network and pedestrian access and cycle movement through the site. Future needs will be met through the expansion or redevelopment of existing school sites and the allocations of new sites as shown on the Policies Map.

5.13 Early discussions with the NHS and the use of the NHS Healthy Urban Development Unit's "Planning Contribution Model for London" as a tool to calculate costs and financial contributions are strongly encouraged. Typically, these contributions will fund capital projects. However, in designated opportunity areas, it may be appropriate to seek a revenue contribution over a fixed period to cover the gap between the arrival of a new population and their inclusion within the Department of Health funding allocations.

5.14 The Council will continue to work with infrastructure providers and relevant groups to ensure that community facilities and services are developed and modernised to meet changing requirements and reflect the new approaches to service delivery.



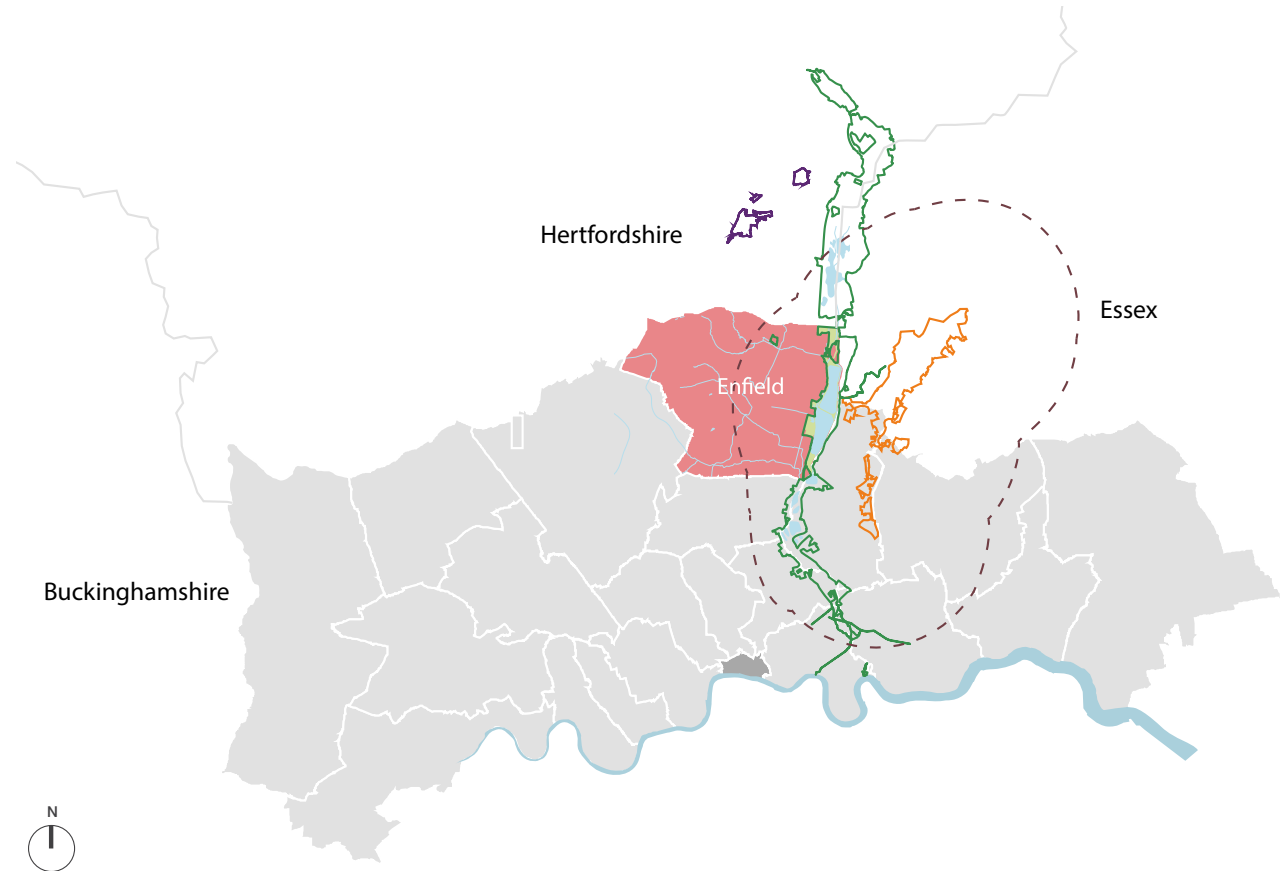
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# INTRODUCTION

- 6.1 This chapter relates to the ‘green’ components e.g. parks, open spaces, woodlands, street trees and footpaths, and the ‘blue’ elements e.g. reservoirs, lakes and waterways, of Enfield’s infrastructure. The following policies set out below explain how this network will be protected, maintained and enhanced through new development in line with the placemaking principles set out in chapter 2 of the plan and the long-term vision of Enfield as a ‘deeply green and distinct place’.



Boundaries of key cross-boundary networks

## STRATEGIC POLICY

# BG1: BLUE AND GREEN INFRASTRUCTURE NETWORK

1. Proposals will be expected to contribute to the creation of a more integrated, multi-functional and accessible blue and green infrastructure network and address deficiencies in quantity, quality and access across the Borough. This will be achieved through:
  - a. protecting and enhancing areas of Green Belt and Metropolitan Open Land to maintain their function, quality and openness;
  - b. ensuring development protects and enhances significant ecological features, achieves biodiversity net gain and maximises opportunities for urban greening through appropriate landscaping schemes and the planting of street trees;
  - c. reviewing Sites of Importance for Nature Conservation and areas of biodiversity deficiency to ensure development contributes as appropriate to the Borough's nature recovery network in line with emerging statutory requirements;
  - d. improving the quality, character, value and accessibility of existing publicly accessible open spaces and water spaces across the Borough, in line with the priorities of Enfield's Blue and Green Strategy or successor documents;
  - e. maximising green grid links to enhance access through walking, cycling and public transport to key destination points (e.g. town centres), community facilities and publicly accessible open spaces, especially along rivers and waterways;
  - f. protecting, improving and enhancing access to blue spaces and the wider water environment and improving relationship with the river and naturalising the riverbank through the removal of hard engineered walls and culverts and introducing new habitats to the river corridor;
  - g. protecting and enhancing existing residential moorings located on the River Lee and River Lee Navigation;
  - h. maximising opportunities to create and increase publicly accessible open space and outdoor sports (including playing pitches and ancillary sporting facilities) with a range of sizes across a range of users, particularly in locations which experience the highest level of deficiency within the Borough;
  - i. protecting and enhancing the Borough's habitat and wildlife resources, including linking green spaces with identified wildlife corridors, protecting and enhancing species and habitats identified in the Blue and Green Infrastructure Audit and London Biodiversity Action Plan or updated equivalent, and creating new nesting and roosting sites;
  - j. supporting community food growing through development and building new partnerships with social enterprise and voluntary organisations that aspire to designate important local open spaces as local green spaces; and
  - k. maximising opportunities to preserve, enhance and better reveal the significance of Enfield's historic landscapes, including watercourses.
2. Future blue-green interventions will be prioritised in the following locations (as shown on **Figure 2.4: key diagram**) through:
  - a. creation of a continuous 'green-loop' – a walking and cycling route extending from the open countryside, via the river valleys, into the main urban area and



- onto the Lee Valley Regional Park and Enfield Chase;
- b. provision for professional and community sports, recreation and leisure facilities, including ancillary and related uses set out in Policy CL4);
- c. expansion of routes into the Lee Valley Regional Park where appropriate alongside open spaces and river corridors;
- d. naturalisation and catchment restoration of Salmons Brook, Turkey Brook and Pymmes Park through natural flood management
- e. creation of a new publicly accessible restored landscape at Enfield Chase comprising new woodland, open space and extensive landscape restoration;
- f. new continuous and publicly accessible linear parks (including Brooks Park and Edmonton Marshes) across strategic development sites;
- g. grey-to-green corridors: Public realm improvements along main routes (e.g. A10, A406 and A101) and at key stations and town centre gateways, such as sustainable drainage systems (e.g. rain gardens, buffer strips and wildflower verges), civic squares and water features;
- h. new crossings/bridges over the A10, A406 and Lee Valley line to overcome east-west severance;
- i. sensitive restoration and enhancements of Registered Parks and Gardens (Forty Hall, Trent Park, Grovelands Park, Myddelton House Gardens and Broomfield Park) and associated visitor attractions; and
- j. revitalisation of open spaces and leisure/recreational activities at Picketts Lock and Ponders End.

## EXPLANATION

- 6.2 As an outer London Borough, Enfield boasts some of the finest parks, gardens, woodlands and open spaces in the UK, attracting millions of visitors every year. These include:
- over 1,000 hectares of open space, making it the second largest expanse in London along with more than 330 hectares of publicly accessible natural and semi natural greenspaces<sup>22</sup>
  - over 300 hectares of woodlands and scrublands;
  - over 20,000 street trees;
  - reservoirs and 6 freshwater lakes;
  - the presence of the Green Belt and Metropolitan Open Land covering over 40% of the total land area;
  - 41 sites of nature conservation importance; and
  - approximately 100 km of watercourses, which is the longest length of any London borough.
- 6.3 Currently, there is approximately 1 hectare of publicly accessible natural and semi-natural green space (designated as SINC)s per 1,000 residents in the Borough. There is a similar amount of formal parks and gardens, alongside other greenspaces such as amenity space, green chains, allotments and community gardens, cemeteries and churchyards, and

<sup>22</sup> Enfield Blue and Green Infrastructure Audit 2020

formal outdoor sports provision which together equate to over 3 hectares of publicly accessible greenspace per 1,000 residents on average. This suggests that as a whole, Enfield meets Natural England's Headline Green Infrastructure Standards<sup>23</sup>. However, with just one Local Nature Reserve in Enfield at Covert Way, there is room for improvement, and with additional population growth there will be a need for both enhancements to existing green spaces and the creation of new ones.

6.5 Many of the Borough's conservation areas contain extensive green spaces or important incidental spaces, often designed as part of planned estates, such as Trent Park and Forty Hall. Important historic landscapes are also present at Myddelton House, Capel Manor and West Lodge Arboretum. Grovelands Park, Trent Park and Bloomfield Park are identified on the heritage at risk register and require sensitive restoration.

6.6 This policy, alongside Enfield's Green and Blue Infrastructure Strategy 2021, and Enfield's Recreational Strategy 2023, aims to promote the continued protection, management and expansion of Enfield's blue and green network as an integrated whole. This response is directed toward addressing the climate change emergency and the on-going health challenges. Detailed boundaries, which include nature conservation sites, recreational strategies parks, public rights of way, and watercourses are set out on the Policies Map.

6.7 Enfield's long-term aspiration is to become the greenest borough in London, a cornerstone of London's nature recovery as articulated in Enfield's Blue and Green Strategy. To realise this vision, a series of strategic or landscape-scale interventions have been identified across the Borough as identified in the key diagram to help us in achieving this goal.

6.8 Development proposals will be expected to deliver improvements to open spaces, sustainable drainage systems, river corridors, green chain links and ecological networks. These enhancements should be in line with the principles of environmental gain set out in the government's 25 Year Environmental Plan.

6.9 Enfield's Blue and Green Infrastructure Strategy should be used as a starting point to guide the provision of blue and green infrastructure within new developments. Good practice guides and tools are also available from the Mayor of London such as the All London Green Grid Supplementary Planning Guidance, and government

<sup>23</sup> <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/GIStandards.aspx>

<sup>24</sup> Enfield Blue and Green Infrastructure Audit 2020



Pymmes Park Path

## Blue and Green Enfield

agencies, including Natural England's Climate Change Adaptation Manual and Natural Green Space Standards. Blue and green infrastructure must be an integral component of new neighbourhoods and should be seamlessly integrated into the wider network, such as the linear corridors, strategic nodes and green grid links.

6.10 We will work with developers and other partners to facilitate the implementation of projects and programmes set out in Enfield's Blue and Green Infrastructure Strategy and other relevant strategies. This collaboration will take into account the priorities identified in the latest audits and future management and maintenance arrangements. Funding will be sourced from developer contributions and various external funding sources.

- Rain gardens
- Constructed wetlands strategic opportunities
- Existing constructed wetlands
- Green links
- Green loop
- ▨ Lee Valley Regional Park
- Existing woodland
- New Parks
- Green Belt
- Metropolitan open land
- Local open space
- Watercourse

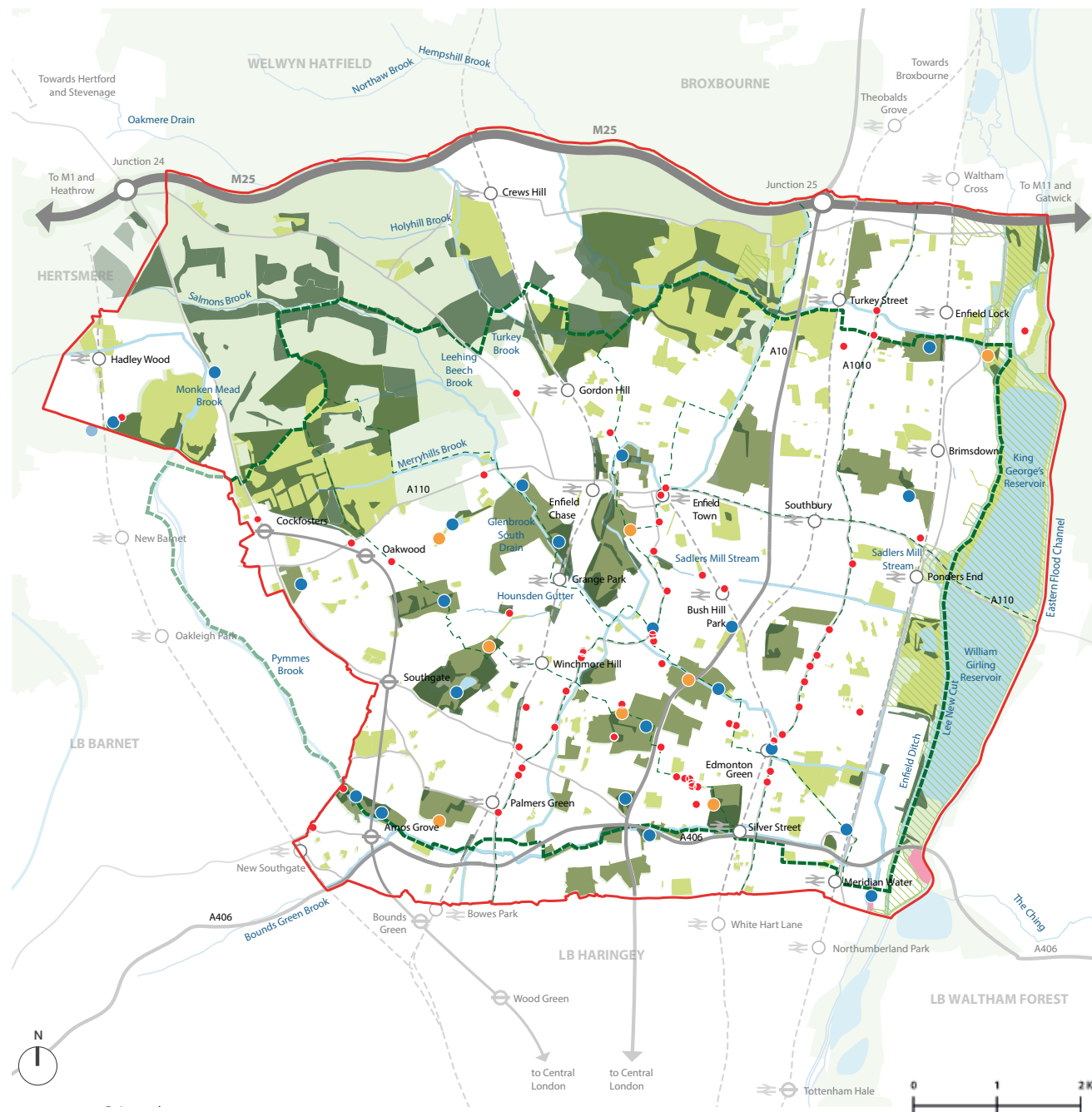


Figure 6.1: Enfield's blue and green network



Blue and Green Enfield

Corridors of activity and movement



Strategic nodes:

1. Enfield Town
2. Meridian Water
3. Ponders End waterfront
4. Crews Hill
5. Enfield Lock
6. Edmonton Green
7. Angel Edmonton
8. Ponder End / Albany Park
9. Firs Farm
10. Forty hall
11. Whitwebbs Park
12. Broomfield Park
13. Grovelands Park
14. Trent Park

Urban green grids

Strategic links

Green Loop route

London National City Park

Lee Valley National Park

Expansion of the borough's cycle and pedestrian network

Sporting excellence

Expansion of the open spaces and route network into the Lee Valley Regional Park

Green Loop

Enfield Chase restoration

Grey-to-green corridors

River and wetland restoration programme

Historic landscape restoration programme

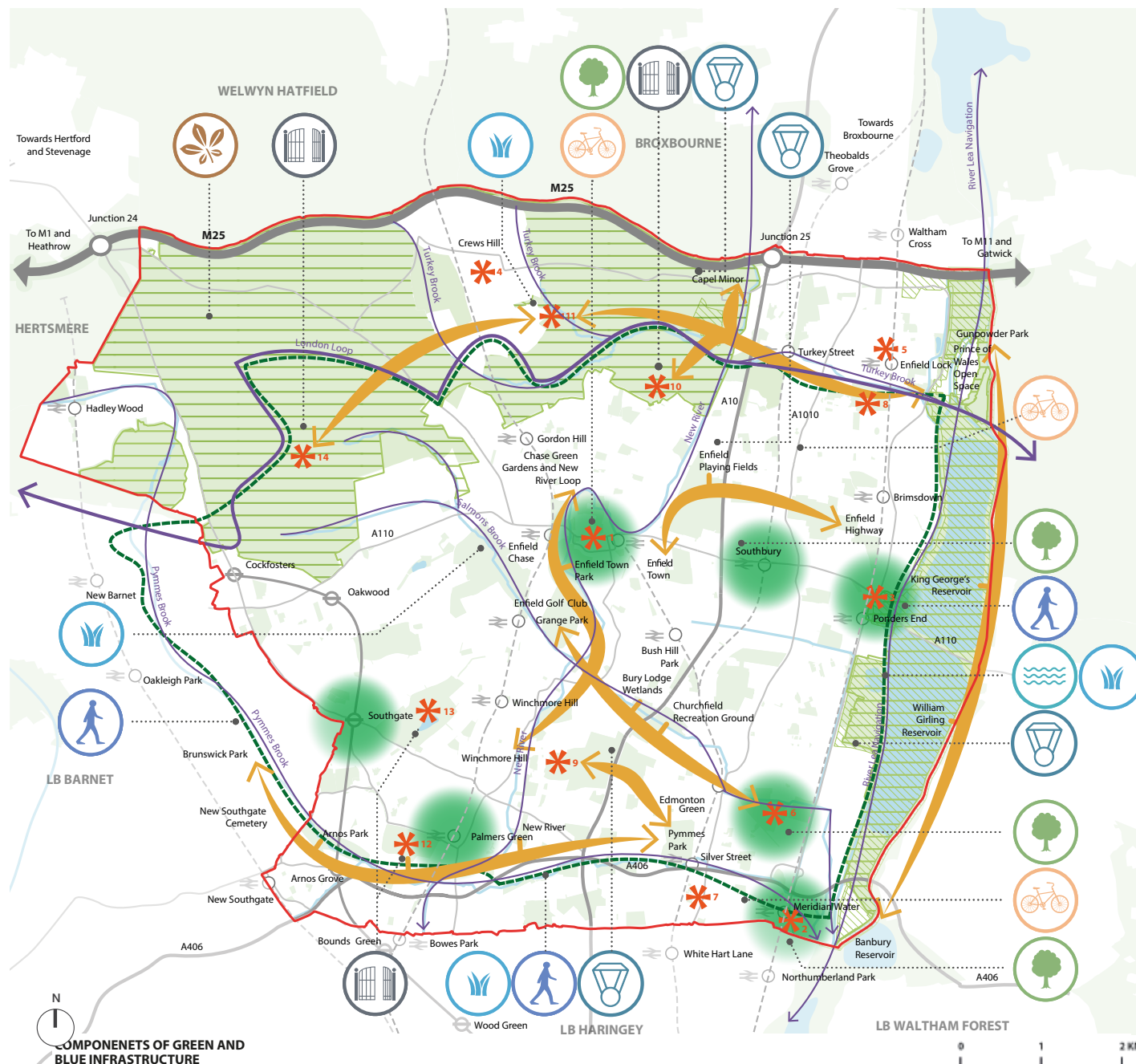


Figure 6.2: Components of the Borough blue and green infrastructure



## STRATEGIC POLICY

# BG2: PROTECTING NATURE CONSERVATION SITES

1. Development will be expected to protect, maintain and enhance the biodiversity and geodiversity value of the Borough's international, national and local wildlife and geological sites in line with the following principles:
  - a. where development has the potential for a likely significant effects on any Special Protection Areas (SPAs), Special Areas of Conservation (SACs) or Ramsar site (and any other sites protected under the Habitats Regulations), either alone or in combination, it would only be permitted if it can demonstrate through a Habitats Regulation Appropriate Assessment that:
    - i. there will be no adverse impact upon the integrity of the designated site, taking into consideration the site's conservation objectives either alone or in combination with other plans and projects;
    - ii. adverse impacts on site integrity can be mitigated; and
    - iii. where the above cannot be met, development would only be considered if it meets requirements set out in the Habitats Regulations. Applicants should, in consultation with
  - Enfield Council as Competent Authority, and Natural England, screen applications for Appropriate Assessment.
  2. Development will not be permitted where it would adversely affect (directly or indirectly) Sites of Special Scientific Interest (SSSIs). Exceptions will only be made where the benefits of the development would clearly outweigh the impacts on the special conservation features of the site and appropriate measures are provided to mitigate and/or compensate harmful impacts. Where SSSIs are essential to the conservation objectives of SACs, SPAs or Ramsar sites, for example as the underlying designations or as 'functionally linked' habitats, the requirements in paragraph 1 apply.
  3. Development affecting the integrity of a Site of Importance for Nature Conservation (as designated on the Policies Map), priority habitats/species, non-designated sites or features of biodiversity interest (directly or indirectly) will only be supported where:
    - a. the mitigation hierarchy has been applied in line with the London Plan to offset the loss of habitats and species;
    - b. it will protect, restore, enhance and provide appropriate buffers around wildlife and geological features as well as links to the wider ecological network; and
    - c. the benefits of the proposed development would clearly outweigh the adverse impact on the biodiversity and geodiversity value of the site.

## EXPLANATION

- 6.11 This policy sets out a hierarchy of designated and non-designated nature conservation sites, from international to local scale. As the hierarchy implies, the level of protection afforded to nature conservation varies according to the value and status of the site.
- 6.12 While there are no designated sites of international importance in the Borough, new development could have the potential to adversely affect the integrity of the Lee Valley Special Protection Area and Ramsar site (and any functionally linked habitat), Epping Forest Special Area of Conservation (SAC) and Wormley Hoddesdonpark Woods (SAC) from the effects of air pollution and increased recreational pressure. Development will be resisted where it would cause significant adverse harm to the integrity of these sites either alone or in-combination.
- 6.13 Sites of Importance for Nature Conservation (SINCs) are also known nationally as Local Wildlife Sites. SINCs have been designated as part of this Plan using up-to-date information<sup>25</sup>, and can be viewed in the Policy Map. These designations raise awareness of its importance for wildlife particularly with regard to planning and land management decision making.

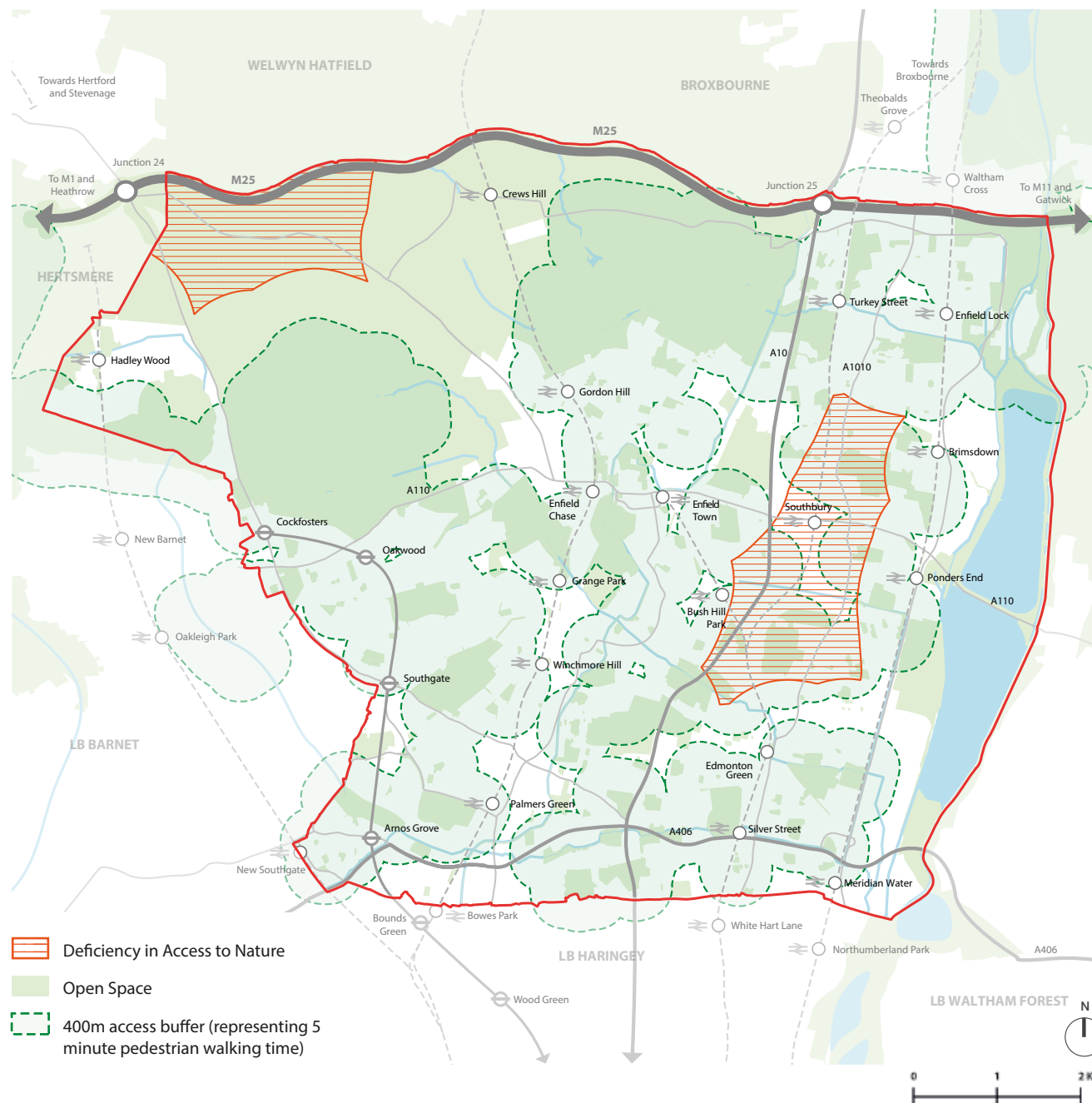


Figure 6.3: Deficiency in access to nature

<sup>25</sup> Review of Sites of Importance for Nature Conservation An Addendum to the Enfield Blue and Green Strategy – Land Use Consultants (November 2020)

## STRATEGIC POLICY

# BG3: PROTECTING EPPING FOREST SPECIAL AREA OF CONSERVATION

1. New development which will have an adverse impact on the site integrity of Epping Forest Special Area of Conservation (SAC), either alone or in-combination with other plans and projects, will not be permitted unless it can demonstrate that adequate measures have been put in place to avoid and mitigate such impacts.
  2. The Council, as the competent authority, will be responsible for determining whether development would have an adverse impact on site integrity at the SAC, taking into consideration the output of an Appropriate Assessment completed in compliance with the Habitats Regulations, and having regard to representations made by Natural England.
- Recreational Impacts**
3. All additional residential development (including strategic allocations) within 6.2km of the boundary of the Epping Forest SAC (known as the “Zone of Influence”), will need to put in place adequate measures to avoid and mitigate potential adverse impacts on the integrity of the SAC. These must be delivered prior to occupation and in perpetuity and agreed with Natural England. Accordingly, developments will need to meet the following requirements:
    - i. All developments of one or more residential unit, including HMOs and other non C3 uses, within the 6.2km Zone of Influence will be required to make a financial contribution towards the Council’s Recreational Mitigation Strategy or provide bespoke mitigation in agreement with Natural England.
    - ii. All developments within the 6.2km Zone of Influence will be required to make a financial contribution towards the Epping Forest SAC Strategic Access Management and Monitoring (SAMM) Strategy per net additional dwelling, indexed in line with CIL payments from the year of implementation. This will be secured via a unilateral undertaking (UU) agreement.
  4. Applicants on larger schemes outside of the Zone of Influence may also need to secure appropriate mitigation and avoidance measures in the form of recreational mitigation to offset any potential effects arising from increased recreational pressure on the Epping Forest SAC (either ‘alone’ or ‘in combination’ with other relevant plans and proposals) in consultation with Natural England, Epping Forest Conservators and other relevant bodies.
  5. Over the lifetime of the Local Plan, should the Council not be able to demonstrate there is sufficient capacity for mitigation, the Local Plan will be reviewed. The Recreational Mitigation strategy will be reviewed every five years in line with this plan, and is intended to provide mitigation in perpetuity, costed at 80 years of maintenance with an endowment function intended to provide in perpetuity mitigation. Natural England reserves the right to object to planning applications where the Strategy is not being implemented, and Enfield Council will prepare a Recreational Mitigation Implementation Strategy within three years of the adoption of this plan and will monitor SANG delivery and take-up in its Annual Monitoring Report.

6. Bespoke recreational mitigation, which is capable of demonstrating no adverse impact upon the integrity of the SAC either alone or in-combination with other plans and projects, must be agreed with the Council and Natural England. Bespoke mitigation must be in place before occupation of development, provided in perpetuity and delivered alongside SAMM contributions.
7. Air quality  
  
See policy ENV1



## EXPLANATION

- 6.14 Epping Forest SAC has been designated under the Conservation of Habitats and Species Regulations 2017 (as amended) due to its diverse range of habitats, including Atlantic acidophilous beech forests and wet and dry heathland, as well as its qualifying species such as the stag beetle (*Lucanus cervus*). The SAC is coincident with Epping Forest Site of Special Scientific Interest (SSSI), which comprises 41 SSSI units. Presently, only nine of these units are within a favourable condition, while the rest are considered to be an unfavourable condition. The core of the Epping Forest Special Area of Conservation (SAC) is situated in the Epping Forest District. However, significant areas of the SAC extend into north London, with the closest being in the London Borough of Waltham Forest, approximately 300 metres east of the Enfield borough boundary and around 1 kilometre east of the nearest developed area.
- 6.15 In the context of the ELP's preparation, a Habitats Regulations Assessment (HRA) has been undertaken. This assessment found that Epping Forest SAC is vulnerable to high levels of existing recreational pressure stemming from activities such as dog walking and mountain biking. It also revealed that the SAC is also sensitive to changes in air quality.
- 6.16 Planning applications for development that have the potential to have a significant effect upon a Habitats site on their own or in-combination with other plans and projects, will be subject to a HRA in accordance with the Conservation of Species and Habitats Regulations 2017 (as amended). As the competent authority, the Council will be responsible

for determining whether development could have an adverse impact on site integrity within the SAC. This determination will take into consideration the output of an Appropriate Assessment, and will have regard to representations made by Natural England.

## Addressing Recreational Pressures

- 6.17 Due to concerns over the impact of recreational pressure on Epping Forest SAC, visitor surveys were commissioned in both 2017<sup>27</sup> and 2019<sup>28</sup>. These surveys collated data on the impacts of recreation, the origins of visitors, and how the SAC is used by visitors. The evidence gathered indicated that the SAC is sensitive to threats and pressures related to public access and disturbances, including issues such as trampling, leading to soil compaction and vegetation wear, erosion, damage to veteran tree roots, excessive dog-waste, fire risks, direct damage to veteran trees and intensive mountain-biking, amongst other impacts<sup>29</sup>. The 2017 report identified that 75% of visitors travelled up to 6.2 kilometres to reach the SAC, and this distance was used to define a Zone of Influence (Zoi) for recreational impacts. The Zoi identified involves multiple local authorities, with seven of them contributing to over 2% of visits to the SAC. This visitor evidence base has informed the development of local plans by local planning authorities (LPAs) located within this Zoi.
- 6.18 To meet Habitats Regulations requirements and to demonstrate that adequate mitigation measures for avoiding and minimising potential adverse recreational impacts on the site integrity of Epping Forest SAC, the evidence from visitor surveys conducted in 2017 and 2019 indicates that a strategic recreation and access mitigation



solution must comprise the following two key components:

- Provision of suitable alternative natural greenspaces, part of a recreational strategy aimed at diverting visitors away from the SAC to prevent recreational impacts; and
- Implementation of strategic access management and monitoring measures (SAMM) directly within the SAC to mitigate on-site recreational impacts.

### Strategic Access Management and Monitoring Strategy (SAMMS)

- 6.19 The Epping Forest Strategic Access Management and Monitoring Strategy (SAMMS) Governance and Tariff Schedule has been developed and agreed upon by all relevant parties. This strategy will ensure the implementation of mitigation measures at the SAC. It identifies the measures that are capable of being delivered within the SAC to mitigate impacts on-site. The Strategy also details the mechanisms for delivery and monitoring, including securing financial contributions from new residential developments within the ZOI. Any development resulting in a net increase in new homes within the ZOI will be subject to development contributions. The current SAMM charge per net additional unit in 2022/23 is £45, payable upon commencement. This will be annually adjusted in line with the Community

Infrastructure Levy (CIL) charging schedule and reviewed as part of future plan reviews. In exceptional circumstances the authority will determine where this payment can be covered through Community Infrastructure Levy Payments.

### Recreational Mitigation Strategy

- 6.20 The purpose of recreational mitigation is to redirect potential new users away from the SAC, thereby preventing recreational impacts. The Council has prepared a Recreational Mitigation Strategy to provide strategic recreational mitigation for developments set out in the ELP, including allowances for unforeseen development. This Strategy to provide strategic recreational mitigation for development has been agreed with Natural England. The Recreational Mitigation Strategy includes guidance on how such mitigation can be delivered through the enhancement of open spaces, provision of green links and improvements to existing green infrastructure assets.
- 6.21 The Council will provide strategic mitigation capacity as set out in the Recreational Mitigation Strategy to help facilitate planning applications for development allocated in the ELP. Development contributions are required for strategic recreational mitigation in cases where there is a net increase in new homes within the zone of influence. The current estimate of recreational mitigation in 2022/23 is £406 per dwelling, to be paid upon commencement through S106 agreements or unilateral undertakings.

This fee will be annually adjusted in line with the CIL charging schedule and reviewed as part of future plan reviews. In exceptional circumstances, the authority will determine where this payment can be covered through Community Infrastructure Levy Payments.

- 6.22 Where developers propose a bespoke solution not included in the agreed Recreational Strategy, this will be assessed on its own merits under the Habitats Regulations and will be agreed with the Council in consultation with Natural England.
- 6.23 When considering the comprehensive approach outlined in Recreational Mitigation Strategy, including the rigorous monitoring at the planning application stage, project specific HRA, the co-development of a Recreational Mitigation Implementation Strategy three years from the adoption of this plan and the regular review of the wider Recreational Mitigation Strategy and oversight by the Epping Forest SAC Technical Oversight Group and SAMMS measures, Enfield Council as a Competent Authority under the Habitats Regulations 2017 can confidently conclude, based on sound scientific evidence, the absence of adverse effects due to recreational impacts arising from the ELP on the Epping Forest SAC.

### Air Quality

- 6.24 See policy ENV1

<sup>27</sup> Footprint Ecology. Liley, D., Panter, C., Weitowitz, D. & Saunders, G. (2018). Epping Forest Visitor Surveys 2017. Unpublished report by Footprint Ecology for the City of London Corporation as Conservators for Epping Forest.

<sup>28</sup> Footprint Ecology. Liley, D. (2020). Epping Forest Visitor Surveys 2019. Unpublished report by Footprint Ecology for Epping Forest District Council.

<sup>29</sup> Natural England. 2016. Site Improvement Plan Epping Forest V1.1. Available at: <https://publications.naturalengland.org.uk/publication/666344685463142>

Blue and Green Enfield

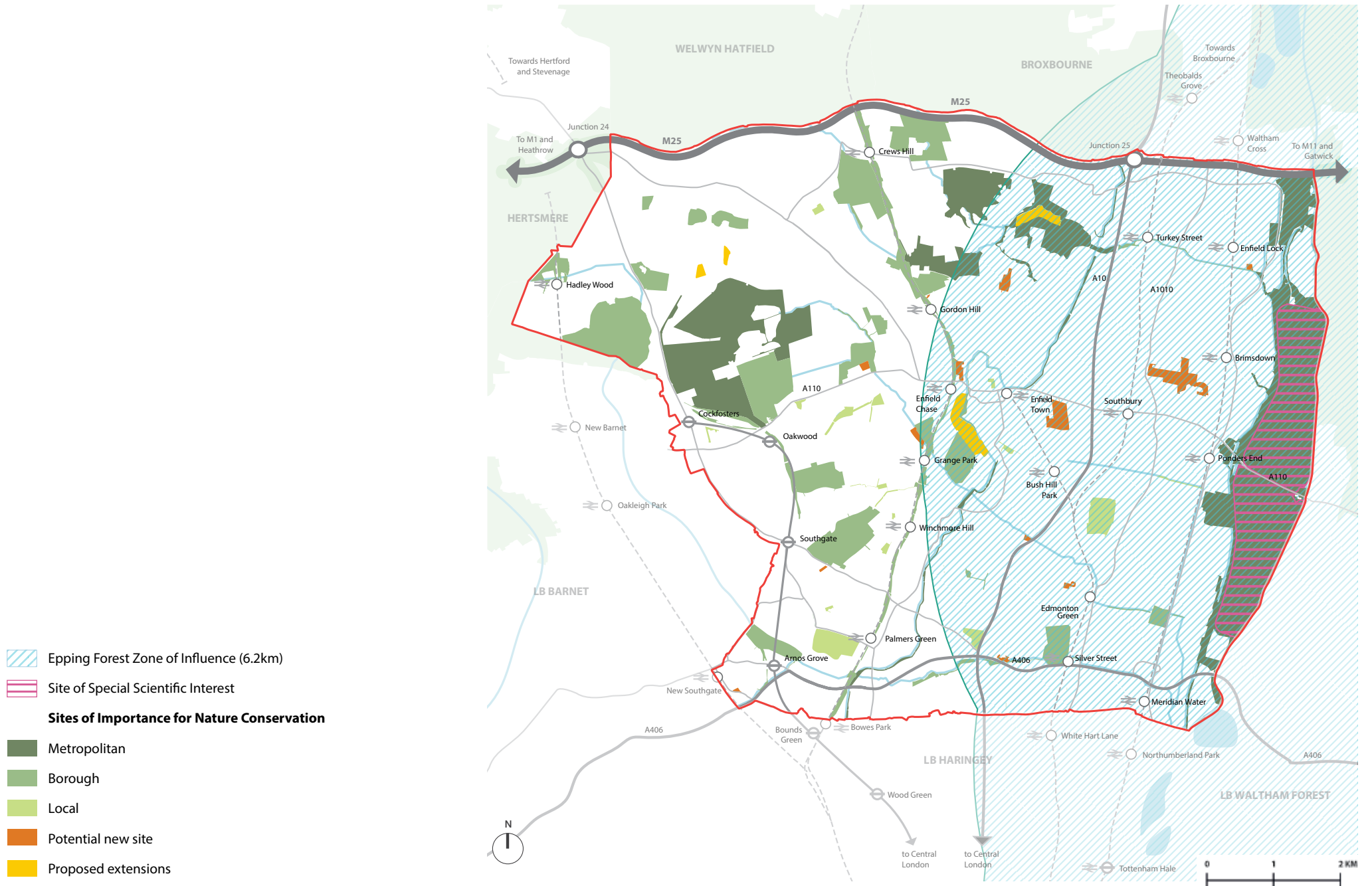


Figure 6.4: Biodiversity and geodiversity sites

## STRATEGIC POLICY

# BG4: BIODIVERSITY NET GAIN, LANDSCAPE RESTORATION AND OFFSETTING

1. All development proposals shall be considered in light of the mitigation hierarchy (avoid, mitigate and compensate) to protect most valuable ecological features of the site and minimise harm to nature. Measures will also be sought to increase or improve biodiversity through the restoration and re-creation of priority habitats and ecological networks and the protection and recovery of protected wildlife populations, especially where there are gaps across existing corridors.
2. Applicants must submit an action plan setting out how biodiversity will be improved as a result of the development to offset the loss or degradation of natural habitat on site (using the latest DEFRA metric model). The action plan will need to provide evidence of how the development will achieve a minimum of 20% net gain, including habitat creation, preferably on site. DEFRA has now confirmed a draft list of eight irreplaceable priority habitats which cannot form part of the net gain calculations and where bespoke mitigation must be agreed where harm is identified.
3. Where the 20% minimum requirement cannot be met on site, or would be better served elsewhere, adequate off-site compensation provision must be provided to an equivalent of better standard to offset the loss of habitats arising from the proposed development.
4. All proposals for biodiversity net gain in Enfield will be required to have regard to emerging Enfield Chase Landscape Recovery Strategy and subsequent London Local Nature Recovery Strategy. The Blue and Green Infrastructure Strategy sets out the evidence demonstrating that there are clear ecological benefits to investing in biodiversity net gain within Enfield. For the purposes of the Biodiversity Metric Calculation, the Enfield Chase Landscape Recovery Area is defined as having High Strategic Significance. Proposals which could lead to losses of biodiversity within the Enfield Chase Landscape Recovery Area will be resisted, even where compensatory credits can be provided elsewhere as this could compromise the area's strategic significance. Particular priority will be given towards contributions to native tree planting, river naturalisation and other habitat creation schemes in this area which compliment public accessibility.

## EXPLANATION

- 6.25 This policy sets out how development proposals will be expected to enhance and increase biodiversity and mitigate or offset the harm arising from the loss of natural habitats (e.g. trees and river corridors) and ecological features, in response to the plan's objective to create a distinct and leading part of London. Net gain<sup>30</sup> is used as a proxy to measure the potential harmful effects arising from a development and calculate biodiversity net gain (e.g. habitat creation or enhancement).
- 6.26 The Environment Act introduced 10% net gain for major developments from 12 February 2024 and minor developments on 2 April 2024. The ELP, once adopted, will require a higher requirement of 20% net gain to support the authority's ambitious nature recovery plans which have been recognised by the Department of Environment, Food and Rural Affairs (DEFRA) through the Landscape Recovery programme. This requirement has been tested for viability impacts. Net gain measurements should be calculated using Defra's biodiversity metric (an online tool) to establish the nature of the harm to biodiversity and the quality of the new green benefits arising from development as well as the anticipated costs of achieving a 10% level of net gain. In line with best

practice, the provision of compensation to address residual biodiversity impacts will not be permitted unless the steps of the mitigation hierarchy (enhance, avoid or minimise, restore, compensate and offset habitat loss) set out in London Plan have been followed and all opportunities to avoid and then minimise negative impacts have been pursued.

- 6.27 Developers will be expected to submit a detailed action plan to ensure that biodiversity measures can be properly considered at the planning application stage, including details of the pre-development biodiversity value of the site and the steps taken to avoid any adverse effects from development.
- 6.28 As a general rule, biodiversity gain should be provided on site. Where this is not practicable or viable (e.g. due to its size or location), off-site mitigation measures will be sought from developers to achieve net gain of at least an equivalent standard in line with the provisions set out in the biodiversity metric. Any contributions will be calculated on a site-by-site basis, based on the cost of mitigation.

- 6.29 Contributions will be sought towards enhancements to Enfield's emerging nature recovery network and the DEFRA funded Enfield Chase Landscape Recovery Programme as well as to the creation of buffer zones, removal of invasive species, planting of native species and river restoration projects (as set out in Enfield's Blue and Green Strategy and Biodiversity Action Plan). Applicants should also consider opportunities to upgrade and enhance existing sites of nature conservation importance (as shown on the Policies Map) and habitat corridors within non-designated areas. In line with DEFRA guidelines these measures will need to be maintained over a minimum of 30 years.

<sup>30</sup> Biodiversity net gain is the achievement of measurable gains for biodiversity through new development and occurs when a development leaves biodiversity in a better state than before development.

<sup>31</sup> The government is considering how mandatory net gain will apply to different sites. There may be targeted exemption for some brownfield sites, as well as those with specific ownership characteristics, such as self-build schemes. Householder development (such as extensions) may also be exempt and the government is considering how net gain will apply to minor development schemes, including whether they are subject to a lower net gain requirement.



## STRATEGIC POLICY

### BG5: GREEN BELT AND METROPOLITAN OPEN LAND

1. Enfield's Green Belt and Metropolitan Open Land as designated on the Policies Map, will continue to be protected against inappropriate development. Permission will not be granted for inappropriate development (as defined by the NPPF) unless very special circumstances (VSC) are demonstrated<sup>32</sup>.
2. Certain forms of development are not considered inappropriate in the Green Belt. Proposals will be permitted where they are consistent with the exceptions listed in national planning policy<sup>33</sup>, are of high quality design and protect, conserve and, where feasible, enhance areas of ecological value as well as public access.

#### EXPLANATION

6.30 The Green Belt is a permanent area of open countryside that wraps around the north and east of the built-up area of Enfield and contains a mix of arable farmland, green spaces and woodlands. Meanwhile, Metropolitan Open Land consists of strategic open areas within the built-up-area that contributes to the physical structure, including several public parks like Trent Park, Grovelands Park and Broomfield Park, as well as parts of the Lee Valley Country Park. It is important to note that Metropolitan Open Land is afforded the same status and level of protection as the Green Belt in line with the London Plan. This policy seeks to protect and safeguard the extent of the Green Belt and Metropolitan Open Land along with their fundamental qualities, as shown on the Policies Map).

ecosystem services based on a natural capital accounting approach including biodiversity net gain, recreational opportunities, flood risk mitigation, improvements to water quality, as well as other diverse cultural and health-related benefits. Following the United Nations Millennium Ecosystem Assessment<sup>34</sup> these services can be broadly categorised into provisioning services, regulating services, cultural services, and supporting services. The development of these services, for example through Enfield's Landscape Recovery work with DEFRA, will complement the ELP.

6.31 Within this context, these green assets contribute to the overall suburban and rural setting of the Borough. They facilitate access to green and blue spaces, offering opportunities for outdoor sports, recreation and connectivity to the wider blue and green infrastructure network. Such areas contain diverse uses including agriculture, open spaces, wildlife sites and historic assets. These multifunctional benefits can provide

<sup>32</sup> NPPF paragraphs 147 to 151.

<sup>33</sup> NPPF paragraph 149

<sup>34</sup> <https://www.millenniumassessment.org/en/index.html>



Edge of Green Belt

Blue and Green Enfield



Figure 6.5: Green Belt and Metropolitan Open Land, Rural Enfield and Lee Valley Regional Park

## STRATEGIC POLICY

# BG6: DEVELOPMENT IN THE OPEN COUNTRYSIDE AND GREEN SPACES INCLUDING IN THE GREEN BELT AND METROPOLITAN OPEN LAND

1. Inappropriate development within the Green Belt and Metropolitan Open Land (as shown on the Policies Map) will not be permitted. Development that is not inappropriate will only be permitted where:
  - a. the siting, scale, height and bulk of the proposed development is sympathetic to and compatible with the primary aim of preserving the openness of the Green Belt;
  - b. it has regard to site contours, displays a high standard of design and landscaping to complement and improve its setting, and takes all measures to ensure that the visual impact on the wider Green Belt and historic landscape/features is minimised;
  - c. the nature, quality, finish and colour of materials blend with the local landscape (as defined in the Character of Growth Study) to harmonise with surrounding natural features and historic character; and
  - d. appropriate parking provision, safe access, egress and landscaping is provided to ensure vehicles are parked safely and that the development does not prejudice the openness of the Green Belt and Metropolitan Open Land.
2. Limited infilling within existing settlements (villages and hamlets) and the partial or complete redevelopment of previously developed sites within the Green Belt will be permitted where it can be demonstrated that:
  - a. the development would not lead to any significant increase in motorised traffic generation, as evidenced through a suitable traffic modelling tool,
  - b. the development would not have an adverse impact upon the historic character (including landscape character).
3. Agricultural, horticultural and forestry workers accommodation will only be permitted within the Green Belt and Metropolitan Open Land where it can be demonstrated that:
  - a. the associated agricultural unit is economically viable and has sound long-term prospects;
  - b. the dwelling is essential to sustain the viability of the farming enterprise;
  - c. there is no suitable alternative accommodation in the vicinity of the proposed site;
  - d. no existing dwelling serving or closely associated with the holding has been sold, leased or otherwise disposed within the past three years; and
  - e. it is of a scale, design and layout appropriate to its surroundings.
4. Wherever possible, worker accommodation within the Green Belt and Metropolitan Open Land should be sited as close as possible to existing buildings or dwellings.

## EXPLANATION

6.32 Development that is not inappropriate in the Green Belt is defined in the NPPF. This includes some forms of development on previously developed sites, limited infilling within existing settlements and essential housing for agricultural and forestry workers. Nevertheless, there are some situations that may allow certain developments to take place in the Green Belt that under any other circumstances would not be allowed. These situations are known as ‘very special circumstances’ (VSC). When attempting to prove VSC, the onus is on the applicant, who must prove that the exceptional nature of the proposal outweighs the harm it might have on the Green Belt.

6.33 Applicants should, through design and access statements, demonstrate how their development has been designed to reduce the visual impact on the Green Belt. Furthermore, they should clarify how it will improve the attractiveness and quality of the landscape through implementing positive enhancements like including hedgerows and tree planting of native species. Case law indicates various factors that should be considered in these case-by case assessments, including but not limited to:

- the potential impact on both spatial and visual characteristics of ‘openness’, meaning the visual impact and volume of the proposal can be relevant;
- the duration of the development, including its remediability, with consideration for any provisions to return land to its original state or to an equivalent or improved state of ‘openness’; and
- the degree of activity likely to be generated, including considerations related to traffic generation.’

6.34 Limited infill, partial or complete redevelopment of previously developed sites, and temporary accommodation will not be inappropriate, provided that they meet the criteria set out in parts 2 and 3 above and adhere to the requirements set out in national policy. Specifically, the development should not have a greater impact on the openness of the Green Belt than existing development, and should not cause substantial harm to openness where development re-uses previously developed land, while also contributing to meeting the needs for affordable housing.



## STRATEGIC POLICY

# BG7: ENHANCING THE BENEFICIAL USES OF THE GREEN BELT AND METROPOLITAN OPEN LAND

1. The beneficial use and management of the Green Belt and Metropolitan Open Land (MOL) will be supported, particularly where it is integrated with the wider blue-green infrastructure network and consistent with the strategic purposes of these designations.
2. Planning permission for the development of sites that have been removed from the Green Belt or Metropolitan Open Land through this plan will not be granted unless appropriate measures to enhance environmental quality and accessibility in the remaining parts of the Green Belt/MOL have been secured. These enhancements should be obtained through developer contribution or alternative means.
3. Where enhancements have been identified as part of the concept masterplans included as part of the Local Plan, such improvements must be included in the development proposals.
4. The priorities for enhancements to retained areas of Green Belt are the Proposed Enfield Chase Landscape Restoration scheme and the Lee Valley Regional Park (as shown on the policies map respectively) and green linkages to these projects, depending on which site is most proximate to development.
5. Specific enhancements projects proposed by Enfield Council in areas of remaining Green Belt are set out below with further site specific schemes to be determined through the planning application process where necessary. These projects form part of a wider emerging vision for Rural Enfield supported by the Environment Agency and Greater London Authority [See **Policy PL9**]:
  - a. Making 23 hectares of land publicly accessible as a natural burial site at Sloeman's Farm – (fully funded);
  - b. Restoration of 50 ha of council-owned former Whitewebbs golf course into publicly accessible parkland and wildflower meadows and creation of habitat bank at Whitewebbs Wood, subject to planning permission – (expected to be fully funded);
  - c. Making at least 60 hectares of land publicly accessible around Rectory Farm – (fully funded);
  - d. Reforesting at least 60 hectares of land with 135,000 trees – (fully funded);
  - e. London Loop Path – converting a 3.3km footpath from Lavendar Hill to Hadley Road to a 3m wide bound gravel path – (fully funded);
  - f. Creating 50 ponds and wetland scrapers to provide valuable habitats and nature recovery – (fully funded);
  - g. Salmons Brook River Restoration project – (expected to be fully funded by Environment Agency) subject to planning permission;
  - h. Further foot and cycle paths and other amenity features– estimated cost £3,500,000 – full funding required through S106 subject to planning permission; and
  - i. Rectory Farm Visitors Centre to include mountain biking trail centre, wild swimming lake, art trail, performance space and play features– estimated cost £5,483,400 – full funding required through S106 subject to planning permission.
6. Any compensatory improvements not set out above must be provided in accordance with the following hierarchy:

- a. compensatory improvements to remaining Green Belt/MOL land in an area identified for environmental improvements as part of the Council's Green Infrastructure Audit and Strategy and in line with the emerging Spatial Vision for Enfield Chase Landscape Restoration.
  - b. compensatory improvements to remaining Green Belt/MOL land adjacent to, or in close proximity to, the development site; and
  - c. compensatory improvements to remaining Green Belt/MOL land adjacent to, or in close proximity to, the settlement or area accommodating the development.
7. In the event that it is robustly demonstrated that none of the above options can be satisfied (e.g. as land is not available), then the Council will accept a commuted sum that it will use to undertake any further compensatory improvements and maintenance and monitoring of the schemes set out above in other areas of ownership based on an equivalent value including capital costs. Compensatory improvements should prioritise areas with low environmental quality to deliver biodiversity and wider environmental net gains.

## EXPLANATION

6.35 A positive approach will be adopted in the planning of the Green Belt, provided it is consistent with Green Belt law and policy, including wider placemaking strategies and the enhancement to green infrastructure functions. Opportunities for multifunctional enhancement should focus on enhancing multiple aspects, such as natural capital, the quality of the landscape and visual amenity, recreational amenities, sustainable water management, combatting the urban heat island effect, carbon capture and storage, biodiversity, food growing or improving damaged and derelict land.

6.36 This approach should enhance the beneficial use of this land through positive management to deliver multifunctional benefits. As stipulated in Paragraph 142 of the NPPF, plans should set out ways for compensating for the removal of land from the Green Belt by offsetting compensatory improvements to the remaining Green Belt land's environmental quality and accessibility. There are a range of potential improvements that can be pursued to fulfil this requirement and the following are provided as examples, but it is recognised that there may be others:

- establishment or enhancement of green infrastructure;
- planting of woodlands;

- enhancements in landscape and visual aspects (beyond those needed to mitigate the immediate impacts of the proposal);
- improvements in biodiversity, habitat connections and natural capital;
- development of new or enhanced walking and cycle routes; and
- improved access to new, enhanced or existing recreational and playing field provision.

6.37 The Enfield Chase Landscape Restoration project, funded by DEFRA, aims to restore a natural landscape that brings benefits both people and wildlife. This is achieved directly through the restoration of habitats and the creation a new publicly accessible space for various recreational and cultural activities in a natural environment. It also indirectly benefits the community by supplying locally grown produce and reducing the risk of flooding in downstream urban areas. This project will look to cover more than 1,500 hectares, primarily consisting of farmland owned by the council.

6.38 The Enfield Chase Landscape Restoration Project offers an opportunity to re-purpose Enfield's Green Belt for the 21st century. By reinstating the land and transforming it from farmland into woodlands, meadows and wetlands, all while enhancing public access and promoting sustainable commercial activities, there is significant potential to provide a wide range of benefits.

## DEVELOPMENT MANAGEMENT POLICY

# BG8: PROTECTING OPEN SPACE

1. Development involving the loss of designated open space (with the exception of Metropolitan Open Land) will be resisted unless:
  - a. it provides essential ancillary facilities (e.g. changing rooms, play equipment and footpath/cycle links) that will enhance the function, use, accessibility and enjoyment of the existing open space including for underrepresented groups; and
  - b. it is temporary in nature and the open space will be restored back to its original purpose; and
  - c. it provides new outdoor uses, the recreational and sporting benefits of which would outweigh the harm resulting from its loss; and
  - d. replacement open space can be re-provided (as part of the wider development site or within a suitable alternative location within the catchment area) of equivalent or better-quality provision which is accessible to the public.
2. Developments on existing designated open space (as shown on the Policies Map) will be expected to:
  - a. promote the multifunctional and shared use of the existing open space, including schools, private sports facilities and playing pitches, subject to satisfactory management arrangements being put in place; and
  - b. avoid harm to the ecological, heritage, cultural or recreational value of the existing open space or the flood risk levels within and beyond the boundaries of the site.
3. Development will not be permitted on private or semi-private outdoor amenity space such as residential gardens and communal areas within housing estates and other similar non-designated open spaces (e.g. food growing plots) unless the loss of such space can be compensated and the development has overriding planning benefits. Amenity spaces should be designed to be flexible so it can be easily adapted in response to changing needs, such as growing food.

## EXPLANATION

- 6.39 This policy aims to ensure that new development does not unduly harm the integrity and open character of designated open space as indicated on the Policies Map. Instead, it should contribute to the enhancement and/ or expansion of these spaces in alignment with the overarching vision of creating a deeply green place. Some types of development such as changing rooms, play equipment and seating will be acceptable in principle within areas of open space. However, these developments should be proportionate to the scale and function of the existing open space and serve to be ancillary to its main function.
- 6.40 In some cases, existing open space could be replaced or re-provided, particularly as part of a comprehensive redevelopment and/or estate regeneration scheme. This should be considered when it enhances the quality of open space provision within or close proximity to the development site. For instance, it could facilitate the reconnection of previously inaccessible or fragmented open areas or provide a larger and more useable area of consolidated open space. The protection of outdoor sport and recreational facilities against unjustified loss will be resisted, in line with the requirements set out in the NPPF.

## DEVELOPMENT MANAGEMENT POLICY

### BG9 WATERCOURSES

1. Development within or adjacent the Borough's watercourses will be expected to:
  - a. avoid the net loss or covering of watercourses (unless it is a water-dependant or water-related use in appropriate locations and of appropriate scale);
  - b. incorporate suitable setbacks, typically 8 metres, to protect the water's edge and contribute towards its restoration as well as active frontages along the waterfront, where appropriate;
  - c. conserve and enhance views across the water and its open character; and
  - d. provide ecological and biodiversity enhancements to water spaces, having regard to the principles of the Biodiversity Action Plan and the design/landscaping of the public realm.
2. Development within or adjacent to the Borough's waterspaces should promote opportunities that facilitate:
  - a. continuous public access along towpaths, especially where there is fragmentation;
  - b. the provision of water-related uses and sport and recreation activities, notably at Meridian Water and Ponders Lock where this would not conflict with the conservation of designated sites;
  - c. sustainable and/or electric water-borne freight and passenger transport along the River Lea Navigation, where possible and where this would not conflict without the conservation of designated sites;
  - d. de-culverting urban rivers to create naturalised edges, improve links to green spaces and increase the visibility of the riverside, where possible; and
  - e. improved awareness and understanding of the cultural value of the Borough's watercourses
3. Permanent residential and commercial moorings (e.g. marinas and boatyards) alongside associated ancillary facilities and access requirements will be supported where they are located away from the main course of the River Lee and the Lee Navigation Canal and do not have adverse impacts on navigation, biodiversity, micro-climate, amenity of surrounding residents and the public enjoyment of the water space.





EXPLANATION

6.41 This policy seeks to protect, maintain and enhance the quality, quantity, accessibility and usage of the Borough’s existing network of watercourses, as shown on **figure 6.7**. In the context of this policy, watercourses relate to any body of water, whether permanently or intermittent, that is present in the Borough, as detailed in **table 6.2**.

6.42 Collectively, these assets have played a critical role in the development of the Borough and London as a whole, acting as important trade routes, water supply hubs and sources of energy and heat. The River Lee, Enfield Lock, Lee Navigation and New River also have significant industrial heritage and nature conservation value. Nevertheless, a considerable portion of this network remains inaccessible or hidden from public view, due to factors like underground culverts, for instance, along the Salmon Brook and New River Loop/Saddlers Mill Stream), elevated embankments as seen at William Girling Reservoir and the lack of crossing points.

Table 6.2: Categories of watercourses

CATEGORY	DESCRIPTION	EXAMPLES
Watercourses	Main rivers and other smaller streams, whether they are open or culverted.	<ul style="list-style-type: none"><li>• River Lee, Turkey Brook, Salmons Brook and</li><li>• Pymmes Brook (among other smaller ones)</li></ul>
Inland waterways	Navigable stretches of water	<ul style="list-style-type: none"><li>• River Lee Navigation</li></ul>
Artificial watercourses	Man-made structures originally constructed to convey drinking water to London	<ul style="list-style-type: none"><li>• New River – main section runs north-south through the Borough</li><li>• New River Loop – an abandoned section which routes through part of Enfield Town and surrounds.</li></ul>
Reservoirs	Man-man structures which supply drinking water to London	<ul style="list-style-type: none"><li>• Lee Valley Reservoir Chain (William Girling and King George V)</li><li>• Lakes (Trent Park Lower Lake and Grovelands Park)</li><li>• Nearby assets (e.g. Banbury Reservoir and Lockwood Reservoir)</li></ul>

- 6.43 Any proposals seeking to improve public access to the Chingford reservoirs will need to consult with Thames Water to ensure the continued functionality and structural integrity of these sites, while also addressing potential public safety and health risks. Furthermore, some of these reservoirs are part of a network of designated sites in the Lee Valley Special Protection Area (SPA) and Sites of Special Scientific Interest (SSSI). Therefore, consultation with Natural England is likely required, particularly where changes are being made to their management, including changes in access to functionality linked habitats.
- 6.44 Developments situated along or in proximity to waterfront areas will be expected to provide financial contributions to deliver improvements to open spaces, natural habitats, flood alleviation and public access. This emphasis is particularly within areas that lack open spaces and nature deficiency and are suffering from fragmentation. In cases where development is located near a watercourse, it should actively contribute towards the restoration and naturalisation of the river or stream while making the most of opportunities to enhance the floodplain through natural flood management techniques.
- 6.45 There is a strong presumption against development which adversely affects the character and effective operation of the water network. For example, this applies when development plans involves the loss or covering of watercourse, such as culverting or the creation of development platforms. New developments should aim to maximise the benefits of their proximity to waterside areas and their natural settings.
- 6.46 Proposals which generate freight water-borne movements will be encouraged along the Lee Navigation, especially where industrial premises like the Edmonton Ecopark are located in the vicinity. Applicants will need to demonstrate using robust evidence that their operations will not excessively disrupt the local habitats or deterioration of water quality.



Salmons Brook

## DEVELOPMENT MANAGEMENT POLICY

# BG10: URBAN GREENING AND BIOPHILIC PRINCIPLES

1. New development will need to demonstrate how it will exceed the urban greening factor targets set out in the London Plan and how the green features (e.g. brown roofs and living walls) will be maintained throughout the life of the development in line with the principles of biophilic design.
2. New development will be expected to promote opportunities to restore, create and enhance Enfield's tree and woodland resource and improve links to existing assets, including the Lee Valley Regional Park, Enfield Chase, Trent Park and Salmons Brook, with priority given to:
  - a. densely built-up urban areas (e.g. Edmonton, Ponders End, Southbury, Brimsdown and Southgate) which are deficient in terms of access to nature, open space and woodland and experience high levels of deprivation;
  - b. areas of poor air quality along busy radial and orbital routes (e.g. A10, A110 and A406);
  - c. the arc of publicly-owned land between Enfield Chase, Crews Hill and Lee Valley Regional Park; and
  - d. areas of flood risk (including river corridors) to mitigate the impact of new development on the wider catchment.
3. In particular, new development will be required to:
  - a. retain and protect trees and hedgerows of landscape, heritage and biodiversity value on and adjacent to the site, especially those which are healthy and offer a clear public amenity benefit;
  - b. use available roof space and vertical surfaces to install green or brown roofs, living walls and low zero carbon technologies (subject to viability and other planning considerations);
  - c. maximise the provision of soft landscape treatment, amenity space (e.g. garden terraces) and new tree planting (including the use of large, shade-producing trees, pollinator friendly, non-native species and indigenous species, where possible); and
  - d. provide adequate separation between the built form and the trees (including having regard to shading arising from existing trees and buildings and proximity to wildlife sites).
4. Development that will involve the loss or deterioration of ancient woodland, veteran trees, ancient hedgerows, trees covered under preservation orders and other trees of significant amenity or biodiversity value, either directly or indirectly, will be resisted. Where exceptional circumstances can be demonstrated to justify the removal of such trees, adequate compensation measures must be put in place (subject to consultation with Natural England and the Woodland Trust) through a long-term management plan.
5. All new streets (including new cycle lanes and roads) should be tree-lined. Proposals to remove trees on existing streets will be resisted, in particular where they make a positive contribution to local character. Any improvements to the public realm must include a high proportion of greenery (including trees, landscaping and other types of planting) and active spaces.

## EXPLANATION

6.47 This policy seeks to maximise the opportunities for encouraging the greening of both the urban and rural environments in the Borough. This enhancement can be achieved through various means, including landscaping, the establishment of new woodlands and street trees, creating garden roofs and spaces, employing soft landscaping treatments, other types of planting and restoring channelised or culverted watercourses where it is deemed as appropriate. The implementation of such measures will not only improve the aesthetic value of the Borough but also deliver multiple environmental benefits. These benefits encompass improvements in biodiversity, management of surface water run-off and attenuation, reduction of urban heat, noise attenuation, energy savings, improved insulation and water purification to remove pollutants.

6.48 The specified target is based on the urban greening thresholds and a scoring matrix set out in the London Plan. Applicants will need to meet this target or provide compelling evidence to justify why it cannot be achieved. The urban greening assessment to accompany the planning application should assign particular priority to biodiversity enhancements and measures related to climate change mitigation and adaptation. Furthermore, the assessment should outline the long-term maintenance plans for the urban greening measures. We will take a flexible approach where delivery of the urban greening factor would detract from the heritage significance of a building, monument or conservation area or historic park and garden. Urban greening should also form an integral part of the design and layout of public realm schemes and small-scale developments.

6.49 Urban greening measures, such as green or brown roofs, living walls, trees and landscaping should be seamlessly integrated into the design and layout of new developments. This integration maximises environmental benefits by promoting habitat creation, improving building insulation, supporting sustainable drainage and providing cooling effects. The specific type and extent of green roofs or living

walls required will depend on factors such as the proposed development's structure, orientation, and function of the roofspace, as well as the site's character and context, such as its proximity to sensitive receptors, such as noise-intensive activities and heritage constraints. Extensive green roofs are required to have a substrate depth of 75-150mm, unless it can be demonstrated that this is not feasible. Varying substrate depth within this range maximises biodiversity benefits. For recreational or amenity spaces, intensive green roofs with deep substrates should be installed to attenuate surface water runoff and harvest rainwater on site. Further guidance on the installation and maintenance of living roofs or walls can be found in the Green Roof Organisation Code.

6.50 Applicants are advised to seek qualified expertise from a suitably qualified arboriculturist prior to the initial design phase to ensure that any works to trees are carried out in line with relevant British standards and other guidance. Where development necessitates the removal of trees and hedgerows, it must be replaced with provisions of equivalent value, following requirements set out in CAVAT, i-Tree Eco, or another similar valuation system. Where appropriate, planning conditions or legal



agreements will be used to secure the retention of existing trees and landscape features within the site, especially those significant for amenity and nature conservation.

6.53 Tree-lined streets within new developments should feature a mix of native species (semi-mature) and other green elements, such as sustainable urban drainage, to ensure species diversity and resilience against diseases. Whenever possible, new trees should be evenly distributed on both sides of the street. These streets must be well-connected, providing multiple direct routes to key designations like town centres. Particular attention should be given to ensuring accessibility and safety, especially for elderly or disabled people.

6.51 Works involving protected trees (e.g. TPOs) or trees situated within conservation areas must ensure the long-term health of each tree and retain and enhance amenity value of the surrounding area. Where appropriate, new TPOs will be introduced within and adjacent to new development to protect the amenity of important trees. Enfield has vast tracks of ancient woodlands, much of which forms part of the former royal hunting ground, known as Enfield Chase and remains vulnerable to land use change.

6.52 Green and brown roofs or low/zero carbon technologies provide design solutions for energy efficiency targets set out in policies (see chapter 4). These solutions are cost effective for carbon abatement schemes. Where it is claimed that such installations technically unfeasible or economically unviable due to site constraints, design and orientation etc, this must be clearly evidenced within the sustainable design and construction statement.



Heatherwick Studio, ©Hufton+Crow

Maggies, Leeds

## DEVELOPMENT MANAGEMENT POLICY

# BG11: ALLOTMENTS AND COMMUNITY FOOD PRODUCTION

1. Proposals will be expected to include measures that increase or promote food production (from productive landscaping through to food growing spaces, such as roof gardens, allotments and community orchards) and access to healthy and affordable food. Existing allotment sites are shown on the Policies Map.
2. Existing allotments will be protected from development. Proposals should not result in a net loss of allotment provision.
3. Provision of allotments and community food growing sites will be supported as part of new development (including within site allocations) to meet identified needs, especially within areas of deficiency and parts of the urban fringe. Food growing provision will be sought within areas of incidental open space within housing estates and business parks, areas of good quality agricultural land (e.g. farm enterprises), and vacant or underused sites (as a meanwhile use).
4. New food growing spaces should be accessible to everyone and integrated with other uses (e.g. sport and play facilities) and supporting services (e.g. water supply and irrigation), where possible.





## EXPLANATION

6.54 Enfield benefits from good access to agricultural farmland and water resources, stands as a leading centre in the development of sustainable food production and horticulture. The spectrum of food growing spaces includes allotments, nurseries, garden orchards like Forty Hall, community supported agriculture in the form of farm shops, and various commercial production enterprises, including London's only commercial-scale vineyard at Capel Manor. We aim to promote local food cultivation in Enfield, fully maximising on the benefits these spaces offer, such as fostering social interaction, reducing stress and anxiety, promoting physical activity and providing places to relax and unwind. It is incumbent upon us by law to ensure we provide a sufficient number of allotment plots to meet both current and future demands. However, many allotments in the Borough, particularly those in urban areas are operating near or at capacity, with some plots remaining overgrown and neglect. Waiting lists for allotments are also increasing, with pronounced deficiencies in the Lee Valley, Palmers Green, Bush Hill Park and Winchmore Hill areas.

6.55 The provision of food growing opportunities within new developments could take the form of dedicated food growing spaces or as integral components of communal planting schemes, such as fruit bearing trees, shrubs and bushes. Particularly on constrained or tightly defined sites, developments should utilise rooftops, walls or balconies for growing spaces and employ innovative solutions, wherever possible. Community or private food growing facilities should be designed to be affordable, functional and accessible to all who wish to take part. Participants should also have access to essential support services, including water sources (such as water butts or mains water supply) and secure tool storage. In instances where a health impact assessment is required as part of a planning application, it should include consideration of how the development will support access to green spaces, encourage physical activity and provide access to healthy food.



Forty Hall Farm

## DEVELOPMENT MANAGEMENT POLICY

# BG12: BURIAL AND CREMATORIUM SPACES

1. Land will be set aside (as shown on **Figure 2.1: Key Diagram** and Policies Map) to meet the current and future burial needs of Enfield. New burial, memorial and associated facilities will be required to fit sensitively into the Rural Enfield designation.
2. Development involving the provision of reuse, expansion, extension of existing locations – and new burial and/or cremation spaces or related facilities must demonstrate how it will:
  - a. adequately meet the requirements of the various faith groups within the Borough, including groups where burial is the only option;
  - b. be appropriately located and within close proximity to the community it is tended to serve;
  - c. appropriately respond to potential flood risk (as shown on the Policies Map) and air and water pollution issues through the incorporation of mitigation measures; and
  - d. respond to the historic character and significance of the burial ground or landscape.
3. New cemeteries or burial grounds in the Metropolitan Green Belt or Metropolitan Open Land will only be permitted where it can be demonstrated that there are no suitable sites outside of Metropolitan Green Belt or Metropolitan Open Land. These sites do not have to be within the Borough boundary of Enfield.
4. Sites set out in **Table 6.3** are allocated for burial and cremation uses and defined on the Policies Map. Further information on site allocations is presented on the site proformas in Appendix C. The proformas indicate key requirements and considerations that need to be taken into account as sites come forward for development.

**Table 6.3:** Sites allocated for burial and/or cremation uses

SITE ID	SITE ADDRESS
<b>RUR.08</b>	Sloeman's Farm for burial
<b>URB.37</b>	Church Street recreation ground for crematorium

## EXPLANATION

- 6.56 Enfield, much like many other London boroughs, is facing a serious shortage of burial space. This predicament is expected to exacerbate as the population grows and the lack of funeral space leads to escalating costs. Among London boroughs, Enfield one of the highest demands for burial space, but this space is running out due to land shortages and rising demand for burial services. By the end of this decade, Enfield Crematorium will be at full capacity.
- 6.57 Faith communities in the Borough have specific requirements for burials. Muslim burials are primarily taken place at the Tottenham Cemetery in Edmonton, and there are four Jewish cemeteries within the Borough: Western Synagogue Cemetery, Federation of Synagogues Cemetery, Western Synagogue Cemetery and Adath Yisroel Cemetery and Bulls Cross. The Council will continue to work with religious groups and other partners, including cross-boundary authorities to meet future burial need requirements as well as tackle burial space shortages during the plan period.
- 6.58 To meet the diverse needs of the Borough's communities throughout the plan period, the approach for securing sufficient burial space in the right locations is set out in this policy. This approach includes the reuse and intensification of existing sites such as churchyards and cemeteries in the urban area, as well as the provision of new burial spaces including allocations in the Green Belt and extensions to existing designated sites and adjoining undeveloped land.
- 6.59 Newly designated burial plots should be located away from areas of flood risk as shown on the Policies Map, areas with poor air quality, and sources of groundwater pollution. Groundwater risk assessment may be required and should be undertaken in line with the Environment Agency's approach to Groundwater Protection and Cemeteries and Burials<sup>36</sup>. Proposals will be refused if they are at risk of flooding or would cause flooding to existing burial plots regardless of the absence of other suitable sites within the Borough.



## DEVELOPMENT MANAGEMENT POLICY

# BG13: BLUE AND GREEN INFRASTRUCTURE PLANS

1. An integrated blue-green infrastructure plan, included as part of a Design and Access Statement must be submitted alongside major planning applications to demonstrate how the development will:
  - a. prevent net loss, damage or deterioration to blue-green assets (including areas of amenity, heritage and ecological value);
  - b. contribute towards delivering identified opportunities and priorities set out in the Blue and Green Strategy, particularly in areas where there is poor or unequal access to open space and nature as identified in the Blue and Green Audit (2020);
  - c. establish a clear hierarchy of open spaces and public rights of way through the site and integrate them into the wider blue-green network;
  - d. incorporate appropriate landscape and green elements (including new native planting, setbacks/ buffer zones and water features) to reinforce and enhance the open character of open spaces and routes along the corridors and strategic nodes shown on figure xx and mitigate the impacts of pollution;
  - e. help people and wildlife adapt to the impacts of climate change, including naturalised forms of flood storage and additional tree planting;
  - f. take account of the need for tranquil spaces and offer generous biodiversity rich open spaces;
  - g. maximise public access and use of blue-green infrastructure, with clear demarcation between public and private spaces and routes; and
  - h. maintain and manage blue-green features throughout the life of the development (including safety and security arrangements, staffing and upkeep of facilities).
  - i. maximise opportunities to preserve, enhance and better reveal the existing historic environment.



## EXPLANATION

- 6.60 Natural England has published extensive guidance in the form of the Green Infrastructure Framework, which forms part of the Government's 25 Year Environment Plan to support the greening of towns and cities and their connection with the surrounding landscape as part of the wider Nature Recovery Network in England. This guidance supports applicants to meet the NPPF 2023 requirement for new development to be planned to address climate change through the planning of green infrastructure.
- 6.61 Natural England's Green Infrastructure Standards for England set out the ambition for major developments to provide a green infrastructure plan and this policy implements that recommendation.
- 6.62 The policy requires the preparation of blue and infrastructure plans to accompany planning application submissions to ensure proposals protect and enhance blue and green infrastructure and contribute to meeting the objectives set out in Enfield's Adopted Blue and Green Strategy (2021).

- 6.63 Blue and green infrastructure plans will help to guide the design and layout of major developments by integrating proposals for onsite biodiversity net gain and urban greening, sustainable drainage features and public access to enable Enfield's nature and landscape recovery. The intention is that these plans embed both the overarching principles and proposed interventions to the blue-green infrastructure network set out in Policy BG1 and provide the basis for the forthcoming statutory planning of Local Nature Recovery Strategies.
- 6.64 Developers should undertake an evaluation of the green and blue assets and facilities in the vicinity of the proposed development, considering factors like their quantity, accessibility, quality and their significance to the local communities. Each plan should set out a clear vision of how blue and green infrastructure will be transformed and should outline the priorities and planned interventions across the site and wider area.



Worcester Primary School Rain Garden



# 7 Design and Character

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# INTRODUCTION

- 7.1 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.
- 7.2 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.
- 7.3 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.



Jim Stephenson and Karakusevic Carson Architects

Duajrdin Mews



## STRATEGIC POLICY

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

1. 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 well-designed 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;
  - b. **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;
  - c. **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.
  - i. **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

- 7.4 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.
- 7.5 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.
- 7.6 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.
- 7.7 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.
- 7.8 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/>.
- 7.9 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.

## SCALE OF CHANGE RECOMMENDATION

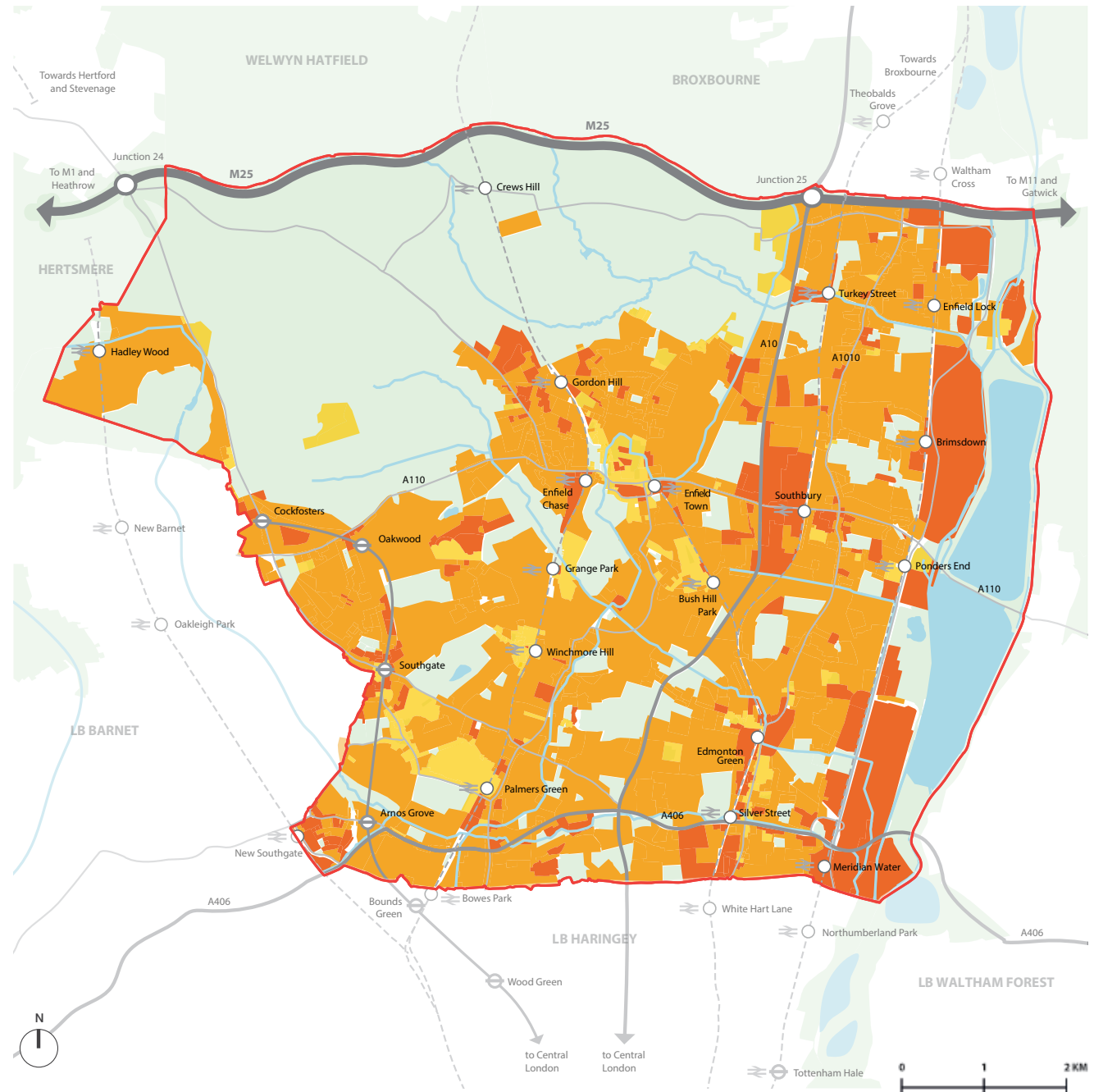
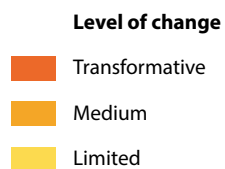


Figure 7.1: Scale of change recommendation

## DEVELOPMENT MANAGEMENT POLICY

# DE2: DESIGN PROCESS AND DESIGN REVIEW PANEL

### 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 pre-application advice. Planning applications for significant major development should be informed by a thorough and genuine pre-application 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 post-planning:

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.
  - b. ensuring the wording of the planning permission, associated conditions and legal agreements provide clarity regarding the quality of design;
  - c. 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.
- 7.11 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.

- 7.13 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.
- 7.14 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.

- 7.15 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;
  - b. 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

7.19 Development should be sufficiently 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.

7.20 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.

7.21 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.

7.22 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.

7.23 Looking beyond statutory minimum requirements and embracing a holistic approach to inclusive design (such as that demonstrated by the DisOrdinary Architecture Project, Many More Parts than M) is strongly encouraged.



Trent Park House

## STRATEGIC POLICY

# DE4: PUTTING HERITAGE AT THE CENTRE OF PLACE MAKING

1. 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;
  - b. realise opportunities to enhance the Borough's cultural, built and landscape heritage;
  - c. better reveal heritage which is not formally recognised, valued or understood;
  - d. seek to sustain and 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;
  - h. 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 Enfield's 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 non-designated 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

- 7.24 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.
- 7.25 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.
- 7.26 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

- 7.27 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.
- 7.28 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.
- 7.29 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

- 7.30 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.
- 7.31 Some of these landscapes have 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.
- 7.32 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

- 7.33 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).
- 7.34 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.
- 7.35 Early engagement with GLAAS will help ascertain at an early stage the presence of significant buried heritage assets

## Heritage at Risk

- 7.36 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

## 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**), shorter-distance 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
<b>1. Barn Hill</b>	Epping Forest District Council off Daws Hill near Sewardsbury Essex E4
<b>2. King's Head Hill</b>	London Borough Waltham Forest – Kings Head Hill junction with The Ridgeway Chingford E4 7EA
<b>3. Mansfield Park</b>	London Borough Waltham Forest – entrance junction of Mansfield Hill / The Ridgeway / Old Church Road Chingford E4
<b>4. Broomfield Park</b>	Range of views from north west corner of the park (Cannon Hill / Aldermans Hill entrance) looking south into Haringey
<b>5. The Ridgeway (A1005)</b>	Spectacular and extensive range of long distance views from The Ridgeway down to Chase Court Gardens junction
<b>6. Whitewebbs Lane</b>	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.
<b>7. Rammey Marsh</b>	Long distance views across the marshes to the open Essex countryside beyond the M25.
<b>8. Clay Hill</b>	Views from junction with Theobalds Park Road, Flash Lane and Strayfield Road.
<b>9. Approach to Enfield Town</b>	From the top part of Windmill Hill near the junction with The Ridgeway down to Chase Court Gardens junction
<b>10. Ponders End</b>	From the bridges over the railway line Nag's Head Road (A110) and Meridian Way (A1055)
<b>11. New Southgate</b>	View from Station Road looking south towards Alexandra Palace
<b>12. Forty Hall</b>	Views from / to Forty Hall across the historic parkland

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



## EXPLANATION


- 7.37 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.
- 7.38 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.**
- 7.39 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.
- 7.40 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.
- 7.41 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



## 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
  - 12 New Southgate
  - 13 Forty Hall

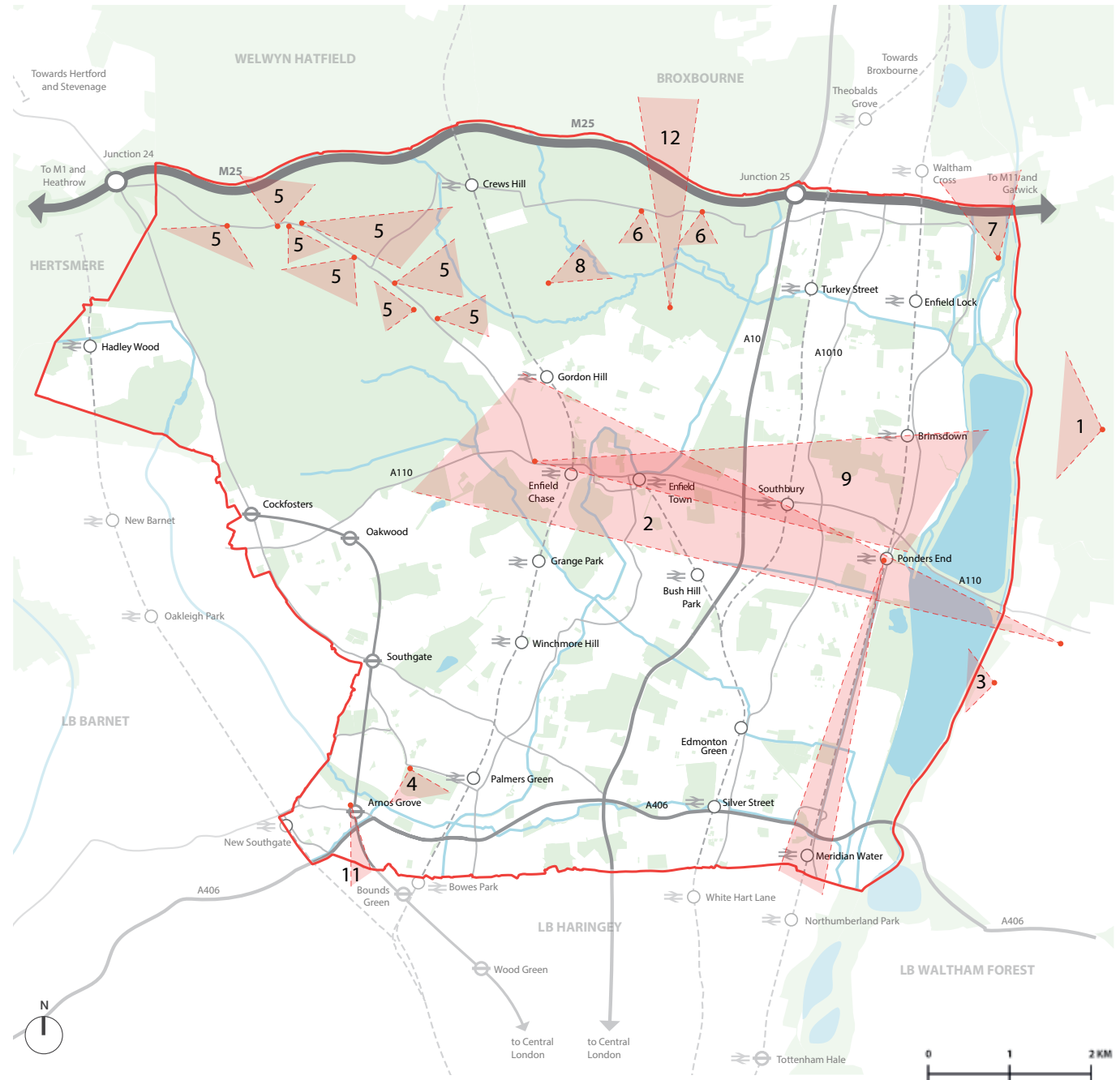


Figure 7.2: Important Local Views

## DEVELOPMENT MANAGEMENT POLICY

# DE6: TALL BUILDINGS

### Definition

1. 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 5.7.3** 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. Within the areas marked as Potentially Appropriate for Tall Buildings (Industrial Intensification Only), tall buildings will be considered as part of proposals for industrial intensification. These buildings will be highly visible and therefore will need individual assessment as their acceptability.

4. **Figure 7.4** also shows the maximum height that is acceptable in design terms. Proposals for height above this level must therefore be justified with reference to the requirements of other development plan policies and/or material considerations.
- 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.
6. 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.
7. 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).

8. Exceptions to these locations for ancillary and operational equipment, such as communications equipment and industrial stacks, may be acceptable where they do not significantly or adversely impact on the skyline.

### Impact on heritage assets:

9. 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.
10. 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

11. 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.
  - c. 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.
12. 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.

13. Applicants must submit 3D models of their designs in an agreed format to allow a full assessment of the tall building (or cumulative impact of a cluster of tall buildings) across the borough as part of the planning application process.

## Safety

14. 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.
15. 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.

## DEFINITION OF TALL BUILDING

\*Refer to Appendix D for detailed maps and guidance

### Borough Wide Definition Map

This map has been produced in line with policy D9 of the London Plan, which requires boroughs to provide local definitions of what constitutes a “tall building”, applying an effective minimum height of 21m.

Enfield is a predominantly low rise borough (typically 2-4 storeys). Therefore, for the majority of the borough, the definition of a “tall” is any part of the building (including roof plant) at 21m or above. Areas where the local context warrants a different definition are spatially defined here.

This map only describes what height is defined as a “tall” for the purposes of applying tall building policies. It does not set out where tall buildings are considered appropriate, nor does it imply that heights up to the definition will be acceptable.

#### Key

- London Plan Minimum Definition - 21m
- Locally Defined Building Height - Area X - XXm

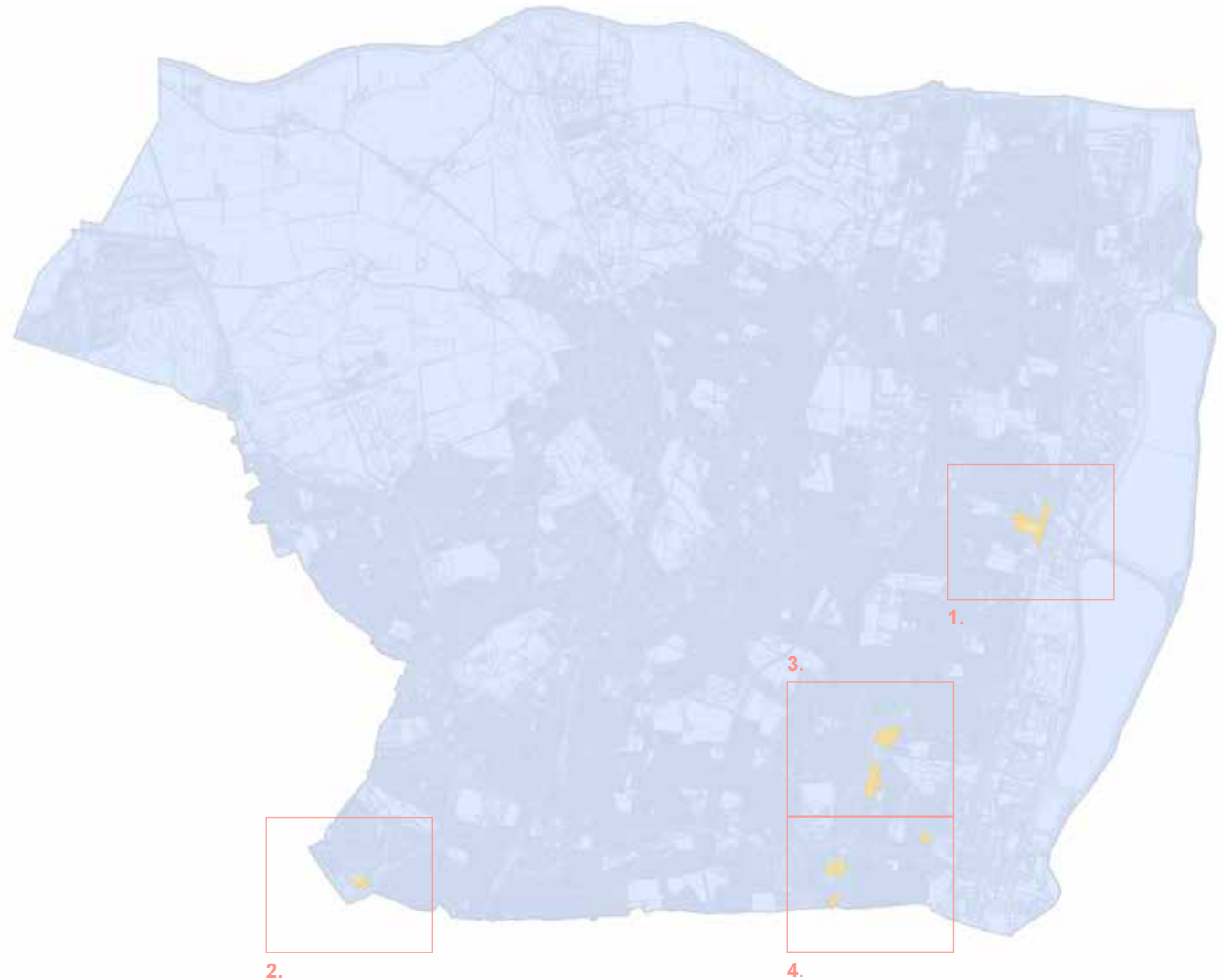


Figure 7.3: Definition of tall building



## APPROPRIATE LOCATIONS FOR TALL BUILDINGS

\*Refer to Appendix D for detailed maps and guidance

### Borough Wide Locations Map

This map shows the proposed areas that could potentially accommodate tall buildings with all other areas being inappropriate. This does not preclude the assessment process required for tall buildings and proposals will still have to adhere to a high standard of design. This map is for information only. Policy maps are shown in each sub area. be acceptable.

#### Key

- 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
- Potentially appropriate for tall buildings enabling industrial intensification only
- Train / Underground Station
- Conservation Area
- Listed Building
- Local Heritage Assets (2018)
- Registered Parks and Gardens
- Major Centre
- District Centre
- Large Local Centre
- Water
- Green Belt

#### Area - Tall Buildings

1. Area\_01\_Cockfosters
2. Area\_02\_Enfield Town
3. Area\_03\_Southbury
4. Area\_04\_Brimsdown
5. Area\_05\_Ponders End
6. Area\_06\_Southgate
7. Area\_07\_New Southgate
8. Area\_08\_Palmers Green
9. Area\_09\_Edmonton Green
10. Area\_10\_Angel Edmonton
11. Area\_11\_Meridian Water

#### Area - Industrial Tall Buildings

- I1. Area\_I1\_South East Enfield
- I2. Area\_I2\_Southbury
- I3. Area\_I3\_Brimsdown
- I4. Area\_I4\_Ponders End
- I5. Area\_I5\_North Enfield

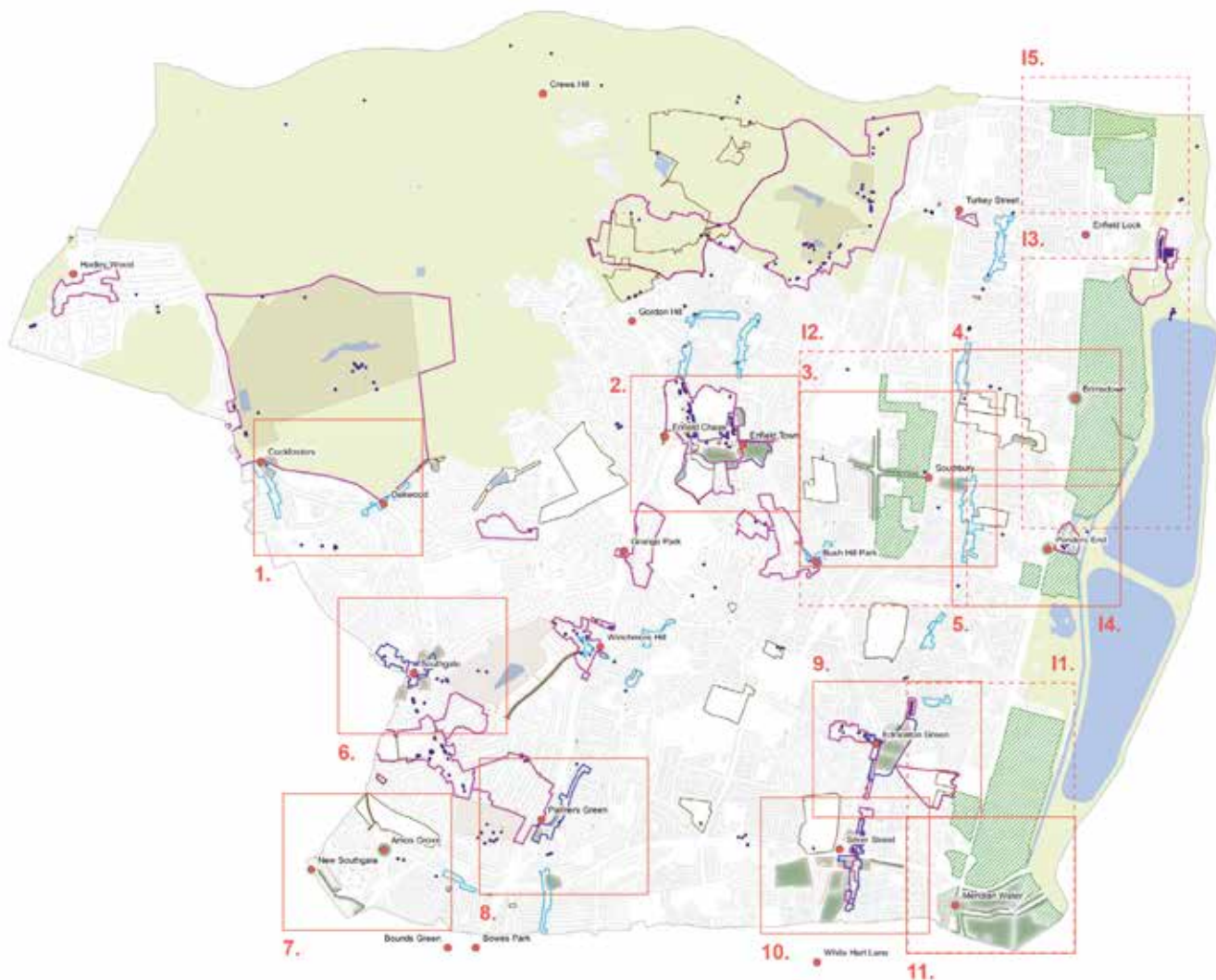


Figure 7.4: Appropriate location for tall buildings

## EXPLANATION

### Definition

7.42 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

7.43 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.

7.44 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.

7.45 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 wider borough legibility.

7.46 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.

7.47 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 CoG report appendix). 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.

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.

7.50 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.

7.51 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.

7.52 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.

7.48 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

7.49 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

## 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;
  - b. adopt a consistent palette of materials and street furniture along routes, squares and road verges which can be maintained and replaced/repared 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;
  - d. 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 well-lit 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;



- e. provide seating and shelter at appropriate locations, which responds to micro-climate conditions, for example, provision on the sunny side of the street.
  - f. prioritise and support active modes of travel including travel pedestrian and cycle movement;
  - g. promote road safety, safer cycling and pedestrian movement around town centres and transport nodes and consider appropriate traffic-calming measures within residential areas;
  - h. incorporate appropriate safety and counter-terrorism measures to mitigate risks (e.g. anti-social behaviour) without compromising the aesthetic and functionality of streets and public spaces, particularly within crowded spaces or important civic spaces;
  - i. ensure electric vehicle charging points are located in accessible locations, avoid creating obstructions on footways and are integrated sensitively to reduce visual impact and clutter.
5. Contributions will be sought towards public realm improvements from residential developments comprising 11 or more units in the place making areas (see **policies: SS1 and PL1-11**). Contributions from non-residential uses will be assessed on a site-by-site basis, taking account of the location, nature and scale of the proposed development and the extent of public access to the site and wider public realm.



Enfield Town, public realm improvements



Dugdale Centre

## EXPLANATION

- 7.53 The public realm can be defined as any space that is freely accessible and open to everyone. A Supplementary Planning Document (SPD) or any subsequent planning mechanism, defining the network and hierarchy of public realm throughout the Borough, along with design guidelines and material palettes, will be prepared to provide a more detailed illustration of how this policy should be put into practice.
- 7.54 The public realm is the key connecting element that runs through Enfield, offering a shared experience for all residents, employees and visitors. Enfield's public realm should:
- be liveable – by focussing on improving the health, wellbeing and reducing impact of noise levels for all users;
  - be inclusive – by providing a safe, convenient, legible and accessible environment for all users; and
  - be high quality by creating locally distinctiveness areas with a strong sense of place; supporting active modes of travel, creating places that encourage people to pause and spend time, fostering sustainability, featuring active frontages and natural

surveillance, and integrating defensible space to ensure privacy, incorporating planting and access to nature, providing high quality detailing and street furniture and implementing effective maintenance arrangements.

- 7.55 The design of the public realm should denote the importance of routes and spaces by following a well-defined street hierarchy, helping people to understand the structure of, and navigation of the Borough.
- 7.56 Enhancements to the public realm will be particularly focussed around town centres, conservation areas, commercial areas, civic spaces (including schools, recreation and leisure facilities), transport hubs, cycle paths, footpaths, and green and blue infrastructure, where they are most frequently experienced. The provision of high quality, attractive and functional public spaces is particularly essential for the success of higher density development.



## DEVELOPMENT MANAGEMENT POLICY

# DE8: DESIGN OF BUSINESS PREMISES

1. All new business premises must make efficient use of land and maximise their contribution to the urban environment. Having regard to viability and the operational requirements of the proposed use, a proposal for business premises will only be permitted where it:
  - a. facilitates movement through the retention, improvement or provision (where there are opportunities for meaningful connections) of suitably located, safe, overlooked and publicly accessible routes including those running along the edges of the site;
  - b. wherever possible, locates servicing, parking and refuse to the rear, sensitively locating and screening these areas where visible from the public realm;
  - c. positively addresses the public realm: publicly accessible and more active areas should front the public realm and be located close to the site entrance. Ground floor uses adjacent to the public realm should have high levels of visual permeability. The building itself should form the secure line wherever possible to reduce the need for other means of enclosure. Building entrances should be prominently located and clearly indicated through the architecture and/or massing of the building. The amount and location of fenestration, landscaping, means of enclosure, architectural detailing and lighting should all help to create a pleasant and safe environment for pedestrians, cyclists and vehicles at all times of the day;
  - d. clearly differentiates between public and private areas and respects any appropriate, existing building lines. In the absence of such a feature, the development should establish one;
  - e. provides inclusive access arrangements and encourages commuting via cycle and on foot, and where possible provides supporting facilities such as showers and lockers;
  - f. is flexibly designed so as to be suitable for a number of different businesses and to facilitate conversion to alternative uses, subdivision and/or amalgamation of units;
  - g. through layout, landscaping and other site features, helps to mitigate the potential for negative impacts on surrounding uses, including consideration of access arrangements for different uses within the site and wider area;
  - h. ensures that the massing and facades of buildings are made visually interesting through consideration of architectural detailing, height variation and fenestration as necessary. Consideration will need to be given to how the development will appear when viewed from the immediate surroundings and in longer views;
  - i. respects the grain, heritage and character of the surrounding area, (for example by wrapping larger buildings in smaller units to maintain activity, character and visual interest where the context is finer grained);
  - j. uses materials that are high quality and considers how, through the use of local materials and those used in surrounding buildings, a distinct character and area identity can be created, enhanced or preserved;
  - k. maximises opportunities for the inclusion of urban greening/SuDS measures and integration with existing blue and green infrastructure;
  - l. creates a good quality internal environment including provision of natural daylighting and ventilation;
  - m. does not conflict with historic land / building use where this use contributes to the character, appearance and significance of a heritage asset; and

- n. avoids and minimises harm to the significance of heritage assets (including their settings) or local character and maximises opportunities for enhancement.
- 2. Proposals involving co-location with residential uses will be supported where it:
  - a. falls outside the designation of Strategic Industrial Location (SIL), and where it involves Locally Significant Industrial Sites (LSIS), complies with **policy E3**;
  - b. minimises overlooking between residential and industrial units (e.g. using top-lighting or angled windows for employment uses along sensitive elevations) and ensures good quality amenity space for each dwelling.
  - c. incorporates measures to ensure acoustic and other environmental mitigation (such as odours, dust and vibration). This can be achieved, for example, with the introduction of winter gardens, triple glazing or mechanical ventilation into the residential buildings on effected facades; and
  - d. addresses movement, access and servicing by separating routes for different uses.
- 3. Larger proposals (e.g. with multiple buildings/occupiers) must consider providing or improving access to walking and cycling infrastructure; sustainable public transport; green spaces/pocket parks; places to eat and drink; creche/ nursery and other ancillary facilities for employees.

## EXPLANATION

- 7.57 Many people spend a large portion of their lives in areas accommodating industrial and employment uses, and as such, they should be attractive and comfortable environments that provide amenities and facilities that contribute to a good quality of life. This policy will help to secure improvements to the urban environment, create flexible, sustainable buildings, facilitate access to and through employment areas and encourage new businesses to locate to Enfield. The policy is reinforced by best practice urban design publications such as the Industrial intensification and co-location Study (Mayor of London, 2020) and Practice Note on Industrial Intensification (Mayor of London, 2018). The rationale for promoting a higher quality environment is supported by evidence contained in the Enfield Characterisation Study (2011). The criteria within the above policy will be applied to all development proposals for industrial and commercial purposes.
- 7.58 The highest standards of design will be sought in areas where a higher quality environment is necessary, including within regeneration areas and commercial centres, adjacent to open spaces or waterways; in the transition zone with other uses; or along public routes connecting people and facilities.



Troubadour, Meridian Water Studios



## DEVELOPMENT MANAGEMENT POLICY

# DE9: SHOPFRONTS AND ADVERTISEMENT

1. Development involving the creation of new, or alterations to existing non-residential ground floor frontages and shop fronts outside of SIL and LSIS will only be supported where:
  - a. the frontage maintains visual interest and does not have a detrimental impact on the street scene;
  - b. the frontage respects the rhythm, style, materiality and proportions of the building(s) or group of buildings of which they form part of (including the upper floors), avoiding damage to existing pilasters, capitals and other significant features, and where possible reinstating lost features important to the character of the street or building;
  - c. separate access to the upper floors of the building is maintained.
  - d. any security shutters proposed are internally mounted, located behind the fascia and visually permeable;
  - e. it does not create an excessively deep fascia zones (except where it would respect the original character of adjoining premises);
  - f. the street number is displayed within the frontage;
  - g. no more than 10% of the glazed area is obscured, and a window display is included and maintained at all times. Window displays should be lit at night using dedicated energy efficient fittings; and
  - h. new and redeveloped shopfronts established on corner sites will be expected to address both elevations to help activate the public realm and contribute to natural surveillance.
2. Advertisements must be of an appropriate size and type in relation to the premises and to the street scene:
  - a. Adverts should not become visually dominant, nor lead to visual clutter;
  - b. Advertisements should not normally extend above the ground floor;
  - c. Fascia boards must be of a height and depth consistent with the traditional proportions of the building;
  - d. Advertisements should not normally project forward of the building line unless this is part of an established and positive character; and
  - e. Internally illuminated signs, box fascias or projecting box signs will not be supported in conservation areas or where they negatively impact designated or non-designated heritage assets. They will also be refused elsewhere in the Borough unless the proposal is: of limited height; recessed into the fascia area (not projecting forward from the building façade); contained between flanking pilasters; or where the proposed advertisement type is a positive feature of the building upon which it is proposed. Internal illumination of the entire sign will rarely be acceptable. Externally illuminated fascias, halo lighting and bracketed sign boards may offer an acceptable alternative.
3. Within conservation areas and for other designated and non-designated heritage assets, the size, siting and illumination of new advertisements must conserve or enhance the heritage asset and protect the special characteristics and overall visual amenity of the heritage asset and its setting. Opportunities should be taken to replace existing advertising signage where it is of a design, location or materials that cause harm to the heritage asset or its setting.
4. Historic shopfronts and/or surviving details must be retained.
5. The local planning authority will consult Highways England on the road safety aspects of advertisements proposed alongside the Strategic Road Network (SRN). Advertisements that are deemed to be detrimental to the safety of the SRN by virtue of their location, size and/or illumination will be refused.

## EXPLANATION

- 7.59 To ensure shopfronts are attractive, secure and characterised by high-quality design, this policy requires that new shopfronts and related alterations respect the scale, character, materials and features of the buildings of which they form part and of the surrounding context.
- 7.60 The term “ground floor frontages” refers to all non-residential development outside designated industrial areas. The majority of these developments are those offering services to the public that are traditionally integrated within the street and located in town or local centres. However, these policies also apply to business premises located away from such centres. Ground floor frontages are defined as any ground floor element of a building that directly abuts the public realm.
- 7.61 The attractiveness of individual shops and other business premises concentrated within Enfield’s town centres is of great importance to the vitality of existing shopping streets and the overall perception of the Borough. Applicants are encouraged to draw inspiration from surrounding buildings, similar buildings elsewhere, historic records (e.g. photographs) and any remaining architectural features to develop an appropriate shopfront and advertisement designs<sup>38</sup>.
- 7.62 Larger businesses sometimes occupy adjacent buildings, which may be of a similar age and character or may have been built at different periods. In either case, it is rarely appropriate to attempt to visually unite historically separate shop units. Separate vertical sub-divisions should be maintained. In cases where these subdivisions have been removed in the past, they should be reinstated as part of proposals for new shop fronts. Similarly, where adjoining buildings have different floor heights, ceiling heights or building lines, it is almost never appropriate to impose uniform alignments of fascias, either in elevation or in plan.
- 7.63 In the right context, advertisements can enhance the appearance and vitality of an area. However, where they are poorly designed or located and where too many signs have been installed, they can cause considerable damage to visual amenity by cluttering the built environment and detracting from the quality of the area.
- 7.64 Internally illuminated projecting box-signs often create unnecessary visual obtrusion in the street scene, appearing awkward during daytime and distracting at night. In many cases, bracketed signboards that are externally illuminated as appropriate can serve as an acceptable alternative. However, just like any signage, particular care should be taken to ensure that no architectural features are not damaged during the installation of any sign.
- 7.65 The recent tendency of installing disproportionately deep fascias will be resisted, notwithstanding the existence of any deep fascias on adjoining premises. Every effort will be made to secure the reinstatement of fascias according to the traditional proportions of the buildings to which they are fitted.
- 7.66 The requirement to light window displays at night and include visually permeable, internally mounted shutters reflects the need to maintain safety and reduce the fear of crime within centres outside of business hours. It is necessary to limit the degree to which glazed areas are obscured (i.e. items fixed directly to the glazing which prevent visual permeability) to maintain both visual amenity and safety through protecting active frontages. This requirement will normally be implemented through a planning condition as part of a planning consent.
- 7.67 Shop fronts should use a consistent palette of materials and consider their relationship with the neighbouring shop fronts to create a cohesive aesthetic along the shopping street or place, thereby enhancing the public realm.
- 7.68 Access to upper floors of buildings must always be maintained to preserve the adaptability of the building. In cases where separate access to different uses on upper floors does not exist, efforts will be made to secure its provision through negotiation when examining new shop front proposals, encouraging access to these via main routes and street frontages to encourage continuous activity.
- 7.69 Fascias, like shop fronts, should be divided in accordance with the architectural pattern and traditional divisions of the buildings on which they are fixed. Burglar alarms should be positioned in the least obtrusive location possible preferably immediately above the fascia) and any associated wiring should be run within the building or otherwise concealed.

<sup>38</sup> Including archive images held in the borough’s Local Studies Library and Archive

## DEVELOPMENT MANAGEMENT POLICY

# DE10: CONSERVING AND ENHANCING HERITAGE ASSETS

1. Proposals affecting a heritage asset, including through development within its setting, must be informed by an analysis of significance which identifies:
  - a. significance of heritage assets affected by proposals;
  - b. contribution made by their setting;
  - c. extent of the impact of the proposal on the significance of any heritage assets affected (including the contribution of their setting); and
  - d. steps taken to avoid or minimise harm.

The level of detail should be proportionate to both the significance of the heritage asset(s) affected and the scale of development. Planning applications with insufficient information will not be validated.
2. Great weight will be given to the conservation of heritage asset and consideration of harm will be weighed against all other material considerations.
3. Enfield will support development which:
  - a. aligns with the aims and objectives of the Heritage Strategy, Conservation Area Character Appraisals and Management Plans;
  - b. demonstrates an understanding of context and significance;
  - c. conserves and enhances the significance of heritage assets
  - d. secures the optimum viable use of a heritage asset which is consistent its conservation;
  - e. makes a positive contribution to local character and distinctiveness;
  - f. provides sufficient information on detailing and materiality to demonstrate a high-quality intervention which responds to local characteristics and architectural detailing
  - 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.
4. Development proposals which seek to improve the energy efficiency of a heritage asset or introduce alternative energy sources will be required to:
  - a. adopt a 'whole house approach'
  - b. take into account the construction of the building
  - c. identify alterations which are suitable, well integrated, and sustainable;
  - d. demonstrate that proposals have been informed by a detailed understanding of the significance of the heritage asset
  - e. minimise and clearly justify any residual harm
  - f. explain how and when the intervention can be reversed.
5. Development which causes cumulative harm to heritage asset(s) 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. Where demolition is proposed, it should be demonstrated that all options for retention, repair and re-use have been fully explored including those options which may not realise the highest economic viability of the asset.

7. Proposal within, or affecting the setting of, a Registered Park and Garden should:
  - a. align with the objectives of the relevant Management Plans;
  - b. demonstrate a clear understanding of the history, design character and significance of the landscape and its setting. This should include an analysis of phasing, topography, planting/arboriculture, vistas/views, garden buildings, statuary, railings, surfacing and lost features.
  - c. realise opportunities to enhance RPGs on the Heritage at Risk Register in collaboration with Historic England and other relevant stakeholders with the aim to remove entries from the Heritage at Risk Register;
  - d. retain and enhance their significance and not prejudice future restoration
  - e. protect significant views within, from and towards RPGs; and
  - f. ensure the restoration of the RPG following temporary limited interventions such as events
  - g. make section 106 contributions to secure heritage benefits within the RPG

where harm cannot be minimised or otherwise mitigated.

8. Where a development has the potential to impact archaeological remains, developers should submit with their planning application an Archaeological Desk Based Assessment and potentially an evaluation report in order to assess the significance of the archaeological resource. Desk Based Assessments should identify opportunities for community participation and improving public understanding.
9. 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.
10. Planning contributions will be sought towards Conservation Area Appraisal and Management Plans from developments comprising 50 or more residential units within or impacting a Conservation Area. Contributions

from non-residential schemes will be assessed on a site-by-site basis, taking account of the location, nature and scale of the proposed development and extent of public accessibility to the site.

11. Proposals affecting heritage assets secure opportunities to conserve, enhance or better reveal heritage significance through Section 106 agreements where harm cannot be minimised or otherwise mitigated.



Myddleton House



## EXPLANATION

### Preparing an application

7.70 Development proposals that have the potential to impact the historic environment are much more likely to gain the necessary permissions and create successful places if they are designed with the knowledge and understanding of the significance of the heritage assets they may affect. Developing proposals before assessing their significance can lead to abortive work, increased costs and delays. Therefore, it is strongly encouraged to engage early before formally submitting an application.

7.71 In situations, where development may affect a heritage asset or its setting, applicants are encouraged to use design and construction professionals with appropriate heritage expertise. Where structural interventions are required, additional weight will be given to plans authored by a CARE Registered Engineer (or similar accredited professional) or subjected to their peer review.

7.72 The plans and supporting information submitted must provide sufficient detail for the impacts on the historic environment to be assessed. Typically, outline planning applications will not normally be considered appropriate for developments which may affect a heritage asset or its setting and

reliance on conditions to demonstrate acceptability will be resisted.

7.73 It is important to note that many heritage assets may remain undiscovered or lack official recognition. Developing a comprehensive understanding of the context and engaging with the Council will allow for these assets to be identified at an early stage.

7.74 Applications should demonstrate how proposals are consistent with relevant character appraisals, management plans and good practice guidance.

### Development

7.75 Heritage assets constitute an irreplaceable component of the Borough's unique character and identity. There is a strong presumption against granting planning permission that could cause harm to a heritage asset. The Council will apply a weighted or tilted balancing exercise, giving the conservation of heritage assets considerable importance and weight against other considerations.

7.76 The enhancement of a heritage asset can take many forms, including, but not limited to restoration, repair, removal of inappropriate development, increased accessibility, improved visibility, increased educational value, conversion to a more appropriate use or enhancing the asset's setting. Rarely will there be no opportunity for enhancement.

7.77 Harm may arise from works to a heritage asset or from development within its setting. In situations where there appears to be a conflict between the proposed development and the conservation of a heritage asset, the Council will consider whether the development's benefits could be achieved in a less harmful way, before proceeding to weigh benefits against any harm.

7.78 Conservation is an ever-evolving practice and not all previous developments may be consistent with current best practices or national / local policies. The Council will support development which seeks to address previous interventions which have had a negative impact upon the character, appearance or significance of a heritage asset or its setting.

7.79 Where the significance of a heritage asset has been compromised in the past by development that was unsympathetic to the asset or its setting, consideration will be given to the cumulative impact of incremental harm. Where harmful development has already occurred, the Council will not support development which repeats or reinforces previous harmful development.

7.80 The Council will not support developments which have a detrimental impact upon the character, appearance and significance of a heritage asset listed on the Heritage at Risk Register. Cumulative harm to these fragile assets must be exceptional.

## Setting and Views

- 7.81 The term ‘setting’ of a heritage asset can be defined as the surroundings in which an asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.
- 7.82 It is important to note that the lack of visibility from the public realm does not equate to a lack of harm. The built environment is experienced in the round and consideration must be given to the impact upon views of heritage assets from private land as well as from within the public realm.
- 7.83 The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places.

## Responding to Climate Change

- 7.84 In 2019 Enfield Council declared a climate emergency. As part of the declaration, holistic approaches to improving the energy efficiency of traditional buildings will be supported. Assessments should demonstrate a clear understanding of construction, location, environment, historic significance, services, and occupant behaviour. Applicants are also encouraged to consider the existing embodied carbon within the fabric of traditional buildings; the carbon required to implement the proposed intervention; the carbon payback period; and alternative options for realising a similar carbon reduction. Harmful interventions should, where possible, be reversible.
- 7.85 Where development proposals include the demolition in whole or part of a heritage asset, it is important to recognise the carbon embodied within the existing structure and include this in a whole life assessment of the buildings carbon emission.

## Archaeology

- 7.86 Development should improve understanding and awareness of the archaeology within the Borough, while maximising opportunities for community engagement and participation.

- 7.87 Depending on the significance of the asset and the nature of the works proposed, there may be the need for a Written Scheme of Investigation to ensure appropriate investigations are carried out before, during and after implementation. This scheme is designed to ensure that information about the asset is recorded and disseminated appropriately, and it is more likely to be required where assets with multiple layers of historic fabric are affected and/or the proposals involve significant loss thereof. The extent and complexity of the scheme should be proportionate to the importance of the asset and the potential impact of the proposal.
- 7.88 In some instances it may be necessary to document buildings, or parts of buildings, which will be lost as a result of demolition, alterations, or neglect in accordance with Historic England’s guidance.

## Access

- 7.89 Historic buildings and landscapes are often perceived as barriers to participation. In most cases, heritage assets are capable of some access enhancements without harm to the significance of the asset. Applicants should undertake access audits of heritage assets at the earliest opportunity to identify enhancements that are consistent with the significance of the asset and with guidance provided by Historic England.

## DEVELOPMENT MANAGEMENT POLICY

# DE11 : LANDSCAPE DESIGN

1. Proposals will be expected to take account of the quality, distinctiveness and the sensitivity of the Borough's Areas of Special Character and other areas of landscape character (including the river valleys of Salmons, Turkey and Pymmes Brooks) and restore, conserve and enhance:
  - a. the landscape character and distinctiveness of the area, including its biodiversity and heritage/cultural value and tranquillity;
  - b. the distinctive setting and identity of settlements (beyond the urban area) and buildings and the wider landscape, including strategic and local views;
  - c. the visual quality of the rural-urban fringe, marking a clear distinction between the urban edge and wider countryside;
  - d. the historic pattern of woodland, forests, trees, field boundaries, vegetation and other distinctive landscape features;
  - e. the special qualities of the historic landscapes, rivers, waterways, wetlands, lakes and ponds, and their surroundings; and
  - f. the topography of the area, including sensitive skylines, ridgelines and geological features.
2. Where impacts are likely to be significant, an assessment of the potential impact of the proposed development on the Borough's landscape (as defined in the Characterisation Study) will be required, taking account of its time-depth, scale, massing, design, height, form, layout and orientation and the measures to mitigate or minimise any adverse impacts (e.g. cumulative).
3. All developments will be expected to provide a high quality, comprehensive hard and soft landscape scheme that:
  - a. includes links to the wider blue-green infrastructure network;
  - b. retain existing landscape features (e.g. garden buildings/structures, historic layout, trees, shrubs, hedges) which contribute positively to the setting and character and historic significance of the area;
  - c. provides sustainable drainage systems and designs that facilitate floodplain compensation and preservation of flood flow routes, where appropriate;
  - d. includes generous tree, shrub and hedgerow planting consisting of appropriate species and nursery stock in the context of location, role and prominence of the landscape feature, and to provide year-round interest;
  - e. incorporate suitable wildlife habitats, including micro-habitats
  - f. create new areas of landscape planting which are visually attractive, safe and easily accessible, using local styles and materials, where possible or recreate areas of lost or eroded historic landscape character;
  - g. contextually appropriate, robust and low maintenance surfacing materials within public areas, including more attractive finishes (including block paving) in key focal spaces and lightly trafficked carriageways; and
  - h. a long-term management strategy with clear responsibilities and regimes to maintain the upkeep of all external areas.

## EXPLANATION

7.90 Enfield's landscape and topography includes a variety of elements, ranging from farmland and woodland ridges like Enfield Chase in the west, to open parklands like Trent Park, landscaped gardens like Forty Hall, river valleys like the Lee in the east. This diverse landscape reflects its important position between urban London and rural Hertfordshire. Detailed information of the characteristic traits of the Borough's landscape can be found in various sources, including the Enfield Area of Special Character review, Enfield Characterisation Study, Heritage Strategy and conservation area management plans.

7.91 Development proposals will be required to assess the proposed impact on the Borough's landscape preferably through a comprehensive design and access statement. This assessment should demonstrate how the need to respect the character and appearance of the Borough's landscape, including its valued features like woodlands, farmlands, public parks and historic landscapes, has been taken into consideration. Development should aim to retain positive features and views, and should explore opportunities for improving the landscape's character.

7.92 Landscaping should be an integral part of any development scheme, and it should be addressed early in the planning process. Detailed landscaping plans should be approved before any works commences on site. New planting becomes particularly important for development sites that border the countryside, helping to soften the transition between the urban and rural areas.



Lee Valley



## DEVELOPMENT MANAGEMENT POLICY

# DE12: CIVIC AND PUBLIC DEVELOPMENTS

1. Development involving the construction of civic buildings, institutions and other buildings providing services to the public will be supported where it:
  - a. faces onto the street/public realm (including all main entrances) and includes an active frontage (windows and doors that provide a visual connection and provide activity);
  - b. is designed to provide a landmark appropriate to the importance and setting of the function, aiding legibility of the wider area;
  - c. builds flexibility into its design and layout to provide adaptable spaces that can be used to meet current and future needs and facilitates ancillary/alternative uses (e.g. community uses for parts of schools);
  - d. is designed to be naturally lit and ventilated to provide a comfortable environment that encourages social interaction (e.g. use of high ceilings in communal spaces);
  - e. communicates the importance and function of the building through architectural cues and appropriate and attractive signage, which is integrated into the built fabric;
- f. positively addresses the public realm through means of enclosure, landscaping, street furniture and the location and design of parking and servicing (car parking should be located at the rear of the building, where possible);
- g. puts inclusive access arrangements in place so that all users can move freely throughout the site; and
- h. maximises opportunities for the inclusion of urban greening, biophilic design principles and integrates/engages with existing blue and green infrastructure where possible.
- i. Respects the heritage of an area and responds to local character and distinctiveness
2. Large-scale civic developments (especially those occupying more than one building) must consider whether public access through the site is necessary to facilitate movement within the area. In this instance, way-finding infrastructure may also be required.

### EXPLANATION

- 7.93 This policy should be read alongside policy SC2. Civic and public buildings and institutions are defined as any building that provides public services, or to which the public has a high degree of access. These can include, but are not limited to, police and fire stations; educational and health care facilities, leisure and cultural venues; community halls and gathering spaces; administrative centres and government buildings. By their very nature, these buildings tend to stand out from surrounding uses and act as prominent landmarks.
- 7.94 This policy seeks to ensure that new public buildings of civic importance or extensions or alterations to existing civic buildings and spaces achieve the very best standards of design. It should enhance the surrounding public realm, fostering a sense of identity and civic pride, while championing urban greening and the principles of sustainable design.
- 7.95 In some instances, larger institutions can inadvertently create a barrier to movement, especially when security measures are implemented to limit access to the site. Measures complying with part 2 of the policy, such as the creation of internal streets, can maintain security while preserving or creating public routes along desire lines. The term 'public access' includes internal routes and circulation, serving purposes like parking, drop-off provision and other points of access and egress.

## DEVELOPMENT MANAGEMENT POLICY

# DE13: HOUSING STANDARDS AND DESIGN

1. New residential development will only be supported if it:
  - a. is appropriately located, taking into account the nature of the surrounding area, land uses, access to local amenities, and any proposed mitigation measures;
  - b. is of an appropriate scale, bulk and massing;
  - c. protects the amenity of occupiers of existing and proposed homes in terms of daylight, sunlight, outlook, privacy, overlooking, noise and disturbance, having regard to best practice, including Building Research Establishment (BRE) guidance on daylight and sunlight;
  - d. meets or exceeds the minimum internal space standards set out in the London Plan (and its successors) having regard for the need to use land efficiently;
  - e. provides a well-designed, flexible and functional layout, with adequately sized rooms in accordance with the Mayor of London's Housing Supplementary Planning Guidance, Building Regulations, BRE Home Quality Mark and other best practice guidance documents;
  - f. meets standards in local and the Mayor of London's guidance relating to accessible housing. Ten per cent of all units (of different sized homes) should be wheelchair accessible or easily adapted for wheelchair users to meet national standards for accessibility and adaptability (Category M4(2) of the Building Regulations). The building as a whole should be designed to be accessible for wheelchair users. All buildings with wheelchair or adaptable housing at above ground floor must include two lifts providing access to those units. Circulation spaces and lifts must be designed to comfortably accommodate buggies and wheelchairs, including waiting areas adjacent to lifts;
  - g. provides adequate access, parking, cycle parking and refuse storage in line with other policies in the development plan, but which do not, by reason of design or location, adversely affect the quality of the street scene;
  - h. ensures that hardstandings do not dominate or cause harm to the character or appearance of the property or street, and are permeable wherever possible;
  - i. ensures that boundary treatments do not dominate or cause harm to the character or appearance of the property or street and maintain visibility splays. In the case of front boundary treatments, the height should not normally exceed 1m;
  - j. is attractive and well designed with no visible external difference between tenures within a local area;
  - k. ensures that habitable rooms (of both new and existing properties) have at least one window where the distance to unobscured windows and/or unscreened private external amenity space of neighbouring residential occupiers is at least 18m, unless it can be demonstrated that this would not result in housing with inadequate daylight/sunlight or privacy for the proposed or existing development.
    - The distance should be measured via a 45 degree line from the edge of windows.
    - This standard does not apply to new windows in the same development that are positioned on facades on an internal corner of a building, e.g. on two adjacent sides of a courtyard).

- This does not apply to the relationship of windows to neighbouring ground floor gardens, where views up to windows will be expected, or landscaped podiums where a visual connection between homes and the amenity space is beneficial.
  - The relative angles of windows (and potential loss of privacy) will be considered where proposals seek to reduce this distance.
  - Habitable room windows fronting a public or communal areas on the same level must have a minimum 1.5m of “defensive space” in front of them. This would normally take the form of private amenity space or planting.
2. Even where it meets BRE guidance on daylight and sunlight, no part of a proposed development should have elements above ground floor that are likely to cause significant visual obstruction within 11 metres (horizontally) of an existing residential window serving a habitable room (drawing a 45 degree line from the edges of the existing window). This standard does not apply to parts of proposals that follow an established building line (e.g. the rear walls of existing houses).
  3. New residential development above ground floor must be set back from the edge of existing amenity space by a minimum of 1.5 metres for every total storey of new development proposed, irrespective of daylight and sunlight implications. i.e. beginning with 3 metres for 2-storey development. This standard does not apply to parts of proposals that follow an established building line (e.g. the rear walls of existing houses).
  4. Side and rear facing windows overlooking adjacent sites (at a distance of less than 11m) will not be permitted above ground floor unless:
    - a. they are necessary to achieve positive surveillance (such as the overlooking of side alleys, streets); or
    - b. they do not result in an adverse degree overlooking and loss of privacy to existing occupiers; and
    - c. it can be demonstrated that their including will not preclude development of a similar form on the adjacent site.
  5. Consideration may be given to the use of high-level windows or obscured glazing, obscured view/angled windows, use of level changes, staggered windows that achieve the above objectives.
  6. Development must maximise dual aspect dwellings as defined in Housing Design Standards LPG (2023).

## EXPLANATION

- 7.96 This policy will secure the implementation of high quality, sustainable development, that has regard for and enhances local character, addresses the existing and future needs of residents, and protects the residential amenity of neighbouring properties.
- 7.97 The policy brings together several best practice standards set out in the London Plan Guidance, Building Research Establishment, National Design Guide and National Model Design Code, and describes how this guidance applies in Enfield. Application of many of the principles set out will be context-specific. Where possible, a standard has been derived as follows:
- 7.98 Front boundary treatments are limited to 1m, to continue to prevent the proliferation of very large, out of character and oppressive front boundary treatments, which damage the relationship of the property with the street as described in Enfield's Characterisation study (2011).
- 7.99 Distancing between developments serves a number of purposes: it helps to maintain a sense of privacy; prevents new development from being perceived as oppressive and/or overbearing; and ensures that all occupants have adequate access to daylight and sunlight. The standards for residential extensions are set out in Policy DE15 and should accord with the above standards. The policy cannot cover every possible scenario, and it is accepted that certain building forms, site constraints and architectural techniques may mean the aims of the policy can be achieved with different standards. However, such cases are likely to be an exception and will need a clear and convincing justification.
- 7.100 The common used standard of 18m between habitable room windows is used across London (see London Plan Housing SPG standard 28 and para 2.3.36) and provides clarity for developers. A 45-degree line from the edge of the window is used, because an investigation of typical arrangements shows this sufficiently limits sight lines into habitable rooms. The standard does not apply across internal corners of the same development because this would severely limit development, and in this scenario, all residents will be aware of the relationship when choosing whether to occupy a property.
- 7.101 The 1.5m "defensive space" in front of habitable rooms originates from best practice established in the Urban Design Compendium (English Partnerships, 2000). Similar standards are missing from later guidance documents, but the principle of privacy remains (see London Plan Housing SPG standard 28 and para 2.3.36. Also implied as a necessary code in the National Model Design Code Fig. 19). It is helpful to reintroduce clarity on what is required. Allowing approach to the window severely damages privacy and results in curtains and shutters being closed, damaging active surveillance of the street.
- 7.102 Part 2 protects outlook. It is sometimes possible to meet BRE standards for daylight and sunlight but cause oppressive visual intrusion. Part 2 ensures this will not be the case. Similarly, Part 3 protects the enjoyment of amenity spaces (for example, building a 2-storey wall along a garden boundary would cause unacceptable and oppressive enclosure of the existing space).
- 7.103 Side-facing windows could cause unacceptable loss of privacy to adjacent occupiers if built close to the boundary. Similar to separation distances between habitable rooms, a baseline standard is required to prevent this. 11m has historically, and successfully, been established in Enfield as the standard.
- 7.104 The policy cannot cover every possible scenario, and it is accepted that certain building forms, site constraints and architectural techniques may mean the aims of the policy can be achieved with different standards. However, such cases are likely to be an exception and will need a clear and convincing justification.



## DEVELOPMENT MANAGEMENT POLICY

# DE14: EXTERNAL AMENITY STANDARDS

1. New development must provide good quality, external private amenity space that is not significantly overlooked by existing development and meets or exceeds the following minimum standards:

**Table 7.2:** Minimum external amenity space

MAXIMUM INTENDED OCCUPIERS	MINIMUM EXTERNAL AMENITY SPACE
1	5sqm
2	5sqm
3	6sqm
4	7sqm
5	8sqm
6	9sqm
6+	9sqm+1sqm for each potential additional occupier

2. All amenity space contributing to the minimum standard must:
  - a. be a minimum of 1.5 metres wide and be provided in one contiguous area. Additional amenity space does not have to meet this requirement; and
  - b. have level access from the dwelling it serves.
3. All private ground floor amenity space, which is the primary source of amenity for a home, must be located at the rear or side of the building (the latter being acceptable if this is adequately screened from publicly accessible areas without the need for occupiers to erect personalised screens).
4. Private amenity space should achieve good levels of sunlight in line with BRE guidance.
5. In addition to private amenity space, developments containing homes with two or more bedrooms must either have larger private amenity spaces or have access to a communal amenity space (either at ground floor or as a podium courtyard/roof terrace) that:
  - a. is not accessible to the public;
  - b. is of a suitable size and containing facilities and landscaping suitable to the number and type of units it serves. As a minimum, this should allow space for external dining, soft landscaping, areas for relaxation and play;
  - c. is overlooked by windows and/or balconies of the development it serves;
  - d. is directly accessed from communal circulation cores (and each individual dwelling on the same level where possible);
  - e. is accessible to wheelchair users and other disabled people; and
  - f. has suitable management arrangements in place.

## EXPLANATION

7.105 Amenity spaces associated with housing provides opportunities for recreational activities, exercise, sports, biodiversity, socialising, and engaging in interests such as gardening and food growing. Having access to multi-functional amenity space can enhance the 'liveability' and overall enjoyment of people's homes.

7.106 Private amenity space refers to open space that are exclusively accessible to the resident/residents of the dwelling. This does not include spaces used for purposes like access roads, driveways, garages/car ports, parking spaces, outdoor storage or landscaped areas primarily meant for providing a setting for the development, such as front gardens.

7.107 A minimum standard of provision is necessary to ensure that any amenity space provided is functional. It is acknowledged that including private amenity spaces as part of flatted developments may present different challenges than housing schemes due to the higher numbers of units which are accommodated and distributed across different storeys on the site. However, both types of development must provide access to good quality amenity space through a combination of private and communal areas.

7.108 The overall quality and design of amenity spaces are also important for their effective functionality. Elements such as screening to facilitate privacy, accessibility, and adequate sunlight to extend their usage, along with proper management arrangements, contribute to creating inviting spaces that encourage leisure and relaxation.

7.109 In areas subjected to excessive noise or air pollution, the consideration of winter gardens as an alternative to external balconies for amenity space may be deemed more appropriate, provided it aligns with acceptable design and access to natural light.

7.110 The standards for private amenity space do not take into account the potential for loss of amenity space resulting from permitted development extensions. In these circumstances the Council may remove permitted development rights to ensure that the minimum standard of amenity space is retained.

7.111 The minimum requirement will not represent an acceptable standard of provision on all sites, as there will be cases where new developments are expected to provide more amenity space. For instance, when the development is located within an area identified as deficient in open spaces or play areas, or where amenity space makes a greater contribution towards setting and the character of areas, having regard to Conservation Area Appraisals and Management Plans and other aspects of the evidence base.

7.112 In the Design and Access Statement, the development should demonstrate how the design of the amenity space accords with best practice.



Roof terrace

## DEVELOPMENT MANAGEMENT POLICY

# DE15: RESIDENTIAL EXTENSIONS

### 1. Extensions

- a. Proposed extensions will only be permitted where:
  - i. the impacts on the amenities of the original building and its neighbouring properties are limited and acceptable;
  - ii. adequate amenity space and the satisfactory access to existing garages or garage/parking spaces is retained; and
  - iii. there is no adverse visual impact upon local character including designated and non-designated heritage assets.
- b. Single storey extensions:
  - i. should not usually exceed 3 metres in depth beyond the original rear wall in the case of terraced and semi detached properties, or 4 metres for detached dwellings except where the extension is to achieve common alignment with its neighbours
  - ii. for proposals in excess of the above, the extension should not breach a 45 degree line drawn from the edge of the nearest window of any adjacent property, unless other site circumstances (such as topography, orientation or a high degree separation between properties) would convincingly justify a more flexible approach..
  - iii. in the case of a flat roof, the single storey extension should not exceed a height of 3 metres from ground level when measured to the eaves, with an allowance of up to 3.5 metres (total height) to the top of a parapet wall.
  - iv. for pitched roofs the extension should not exceed 4 metres in height when measured from the ridge and 3 metres at the eaves.
- c. Extensions above ground floor must:
  - i. not exceed a line taken at 45-degrees from the edge of the nearest window (above ground floor) of any of the adjacent properties;
  - ii. where appropriate, secure a common alignment of rear extensions; and
  - iii. not be highly visible from the public realm if this adversely impacts on the character of the area.

### 2. Side extensions

- a. Extensions to the side of existing residential properties will only be permitted where:
  - i. they do not result in the creation of a continuous façade of properties or ‘terracing effect’ which is out of character with the locality. In all cases a minimum distance of 1 metre from the boundary with adjoining property should be maintained, unless this would be out of character with the context. A greater distance may be required depending on the size and nature of the residential plots, local character, and to prevent adverse impacts on the streetscene and residential amenity;

### 3. Extensions for corner plots

- a. On a corner plot, both side and rear extensions should maintain an acceptable distance from the back edge of the pavement on both streets. This will be assessed having regard to the following:
  - i. the need to maintain a relationship with the established building line and views to the properties along the side street;

- ii. the character of the local area;
- iii. the bulk/dominance of the structure along the street frontage and its desired subordination in relation to the original dwelling;
- iv. the need for adequate visibility splays; and
- v. the need to preserve the lateral separation between dwellings where this makes a positive contribution to local character

#### 4. Roof extensions

- a. Roof extensions to residential properties will only be permitted where they are:
  - i. of an appropriate size and location within the roof plane and, in the case of roof dormers, are visually subordinate, inset from the eaves, ridge and edges of the roof as well as any existing features such as valley gutters and chimneys (insets should normally be a minimum of 500-750mm, depending on the size of the roof);
  - ii. in keeping with the character and materiality of the property, and not dominant when viewed from the surrounding area;

- iii. locating rooflights roofslopes not visible from the highway with their placement, size and number being considered so as to relate to the style, proportions and arrangement of the lower elevation and the prevailing roofscape of the locality.

- b. Roof extensions to the side of a property must not disrupt the character or balance of the property or a pair or group of properties of which the dwelling forms a part.

- c. Roof dormers on front facing roofs will generally only be permitted if they do not materially affect the character of the area and are not dominant or intrusive when viewed from the surrounding area.

- d. Placement of rainwater goods, soil pipes and other services/vents should not be to the aesthetic detriment of the property or roofscape.

- e. Proposals for flat roof dormers within a conservation area, or setting of a listed building, will be refused.

#### 5. Outbuildings

- a. Outbuildings to residential properties will only be permitted where:
  - i. the building is ancillary to the use as a residential dwelling;

- ii. the design has regard to topography (e.g. the additional impact that an elevated position might have);
- iii. it does not project forward of the front building line; and
- iv. it maintains an adequate distance from the dwelling and is of an appropriate height and bulk so as not to adversely impact on the character of the local area and amenities of neighbouring properties.

- b. The size, scale and siting of the development must not have an unacceptable impact on the adjoining properties in line with other policies in this plan.

#### 6. Alterations

- a. Where permitted development rights have been withdrawn to safeguard the character and appearance of a Conservation Area, permission for alterations will only be permitted where:
  - i. They align with Conservation Area Management Proposals
  - ii. Respect the key characteristics of the Conservation Area with regard to details and materiality
  - iii. Provide sufficient information to demonstrate regard for local character
  - iv. Do not cause cumulative harm.



## EXPLANATION

- 7.113 Extensions to residential properties offer an efficient and, in challenging housing markets, often a more affordable and practical solution for adapting to household changes. However, it is important to acknowledge that extensions may disrupt the established pattern and form of development, potentially impacting residential amenity. There should be no chamfering of edges to avoid the policy requirements. While a well-designed extension with a single stepped wall may be acceptable, it is essential to ensure that any step should be of a reasonable length and that the overall aesthetic is not compromised at the expense of maximising extension depth.
- 7.114 Side extensions, especially those developed in close proximity to the side boundaries adjoining neighbouring properties, can create a ‘terracing’ effect. In such cases, semi-detached or detached properties become attached via extensions to those adjoining properties. In many cases, this would be out of keeping with the character of the locality and therefore a clear separation between the built form needs to be maintained.
- 7.115 As a minimum, there should be a one metre separation from the side boundary. However, in situations where this would result in a very large extension due to the size and nature of the residential plot, a greater distance may be required. The determination of the degree of separation should consider the impacts on the street scene and residential amenity (in terms of privacy, outlook, daylight, and sunlight). Developers should also consider the need for appropriate access for ongoing maintenance purposes.
- 7.116 Corner or end of terrace properties occupy prominent places along multiple street frontages. It is crucial to maintain their relationship with both streets and ensure active frontages on both sides. When designing side and rear extensions for these properties, it is important to consider the overall appearance of the whole building and the group of buildings of which they form a part in mind. Generally, extensions should be subordinate to the original dwelling and not overly dominant in the street scene. Exceptions may be considered where an extension can be designed to create a frontage that turns the corner and addresses both streets, subject to the area’s character.
- 7.117 Roof and side extensions, due to their visibility, can have a more discernible impact on the streetscene. Uniformity in architectural treatments, such as roof lines, and the rhythm of building widths are key to maintaining a continuity of character across parts of Enfield. Side facing dormers, in particular, can result in awkward development forms and disrupt the balance of rows of terraced or semi-detached houses, especially where roof treatments are mirrored.
- 7.118 In cases where a property is located within a conservation area or the setting of a listed building, it is uncommon for flat roof dormers to be considered appropriate. When proposing new dormers, they should respect the prevailing character and appearance of the roofscape and not contribute to additional or cumulative harm. It is essential to recognise that the lack of visibility from the public realm does not equate to a lack of harm. Therefore, consideration will be given to the impact upon all types of views at varying scales. The placement and design of dormers should be visually subordinate to the roofslope and relate to the style, proportions and arrangement of the lower elevation. Where a dormer has the potential to cause harm to a heritage asset, a greater level of detail will be required at planning application stage to ensure a high-quality intervention.
- 7.119 Outbuildings can provide spaces for activities ancillary to the residential dwelling, such as space for a study, gym, playroom or summer house. The scale of the outbuilding will be expected to be in proportion to its ancillary function, ensuring it remains subordinate within the site.
- 7.120 Extensions have the potential to increase flood risk. While the specific requirements are not repeated here, applicants should refer to **policy SE7** on managing flood risk for detailed guidance.
- 7.121 To protect particularly important features within Conservation Areas, an Article 4 Direction may be issued. Where planning permission is required for certain works planning applications must preserve and enhance these features in accordance with the Conservation Area Management Proposals. These proposals have been developed to address key issues and vulnerabilities effectively.

# 8 Homes for All

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# INTRODUCTION

- 8.1 The ELP is committed to facilitating the delivery of new housing that meets the local community's needs. One of the primary responsibilities of the Plan is determining the quantity, distribution and type of new homes to be provided. The Borough's initial approach is to optimise the use of previously developed land, reducing the need for new land in non-urban areas. This involves redeveloping existing sites at higher densities in the suburban areas, changing the use of some employment sites, incorporating tall buildings in the placemaking areas, and developing other previously developed windfall sites.
- 8.2 The Council has determined that, in order to meet the housing demand in the Borough, there will be a need to control the amount of planned development and redevelopment on land currently designated as Green Belt. Strategic locations for this purpose are outlined in Policies SS1: Spatial Strategy and the rural placemaking Policies: PL10 and 11. Additionally, strategic Policies for housing (H1), employment sites (E1) and burial and cremation needs (BG12) have identified further sites.
- 8.3 To support housing growth for all, the Council will actively monitor the housing land supply to ensure that a five-year supply of deliverable sites is maintained as required by legislation. The Council will also regularly review and update the data related to housing land supply through the Authority Monitoring Report which is accessible at <https://new.enfield.gov.uk/services/planning/monitoring/>.

## STRATEGIC POLICY

# H1: HOUSING DEVELOPMENT SITES

1. The Local Plan will provide 33,280 new dwellings in the Plan period 2019 to 2041.
2. The sites set out in **Table 8.1** are allocated for housing and where appropriate mixed uses development are defined on the Policies Map. The sites have been selected on the basis of a methodology which prioritises the development of brownfield sites. **Policy SS1** sets out the Borough-wide spatial strategy proposed to accommodate planned growth more fully. Further information on site allocations is presented on the site proformas in **Appendix C**. The proformas carry the status of policy and indicate key requirements and considerations that need to be taken into account as sites come forward for development.

**Table 8.1:** List of sites to be allocated for housing development

SITE ALLOCATION REFERENCE	SITE ADDRESS	PROPOSED LAND USE	ESTIMATED CAPACITY
<b>Enfield Town (PL1)</b>			
SA1.1	Palace Gardens Shopping Centre Enfield	Mixed use (housing and town centre uses)	329
SA1.2	Enfield Town Station and the Former Enfield Arms, Genotin Road	Mixed use (housing and town centre uses at ground floor)	79
SA1.3	Tesco Superstore, Southbury Road	Mixed use (housing and supermarket)	303
SA1.4	Enfield Civic Centre	Mixed use (housing and office uses)	114
SA1.5	St Anne's Catholic High School for Girls, Enfield	Housing	131
SA1.6	100 Church Street, Enfield	Housing	78
SA1.7	Oak House, 43 Baker Street,	Housing	47
<b>Southbury (PL2)</b>			
SA2.1	Colosseum Retail Park	Mixed use (housing and town centre uses)	1,587
SA2.3	Morrisons, Southbury Road	Mixed use (housing and supermarket)	646
SA2.4	Southbury Leisure Park	Mixed use (housing and town centre uses including the re-provision of leisure/recreation uses i.e. cinema)	605
SA2.5	Tesco store, Ponders End, 288 High Street, Enfield	Mixed use (housing and supermarket)	521
SA2.6	Sainsburys Crown Road	Mixed use (housing and supermarket)	868



SITE ALLOCATION REFERENCE	SITE ADDRESS	PROPOSED LAND USE	ESTIMATED CAPACITY
<b>Edmonton Green (PL3)</b>			
SA3.1	Edmonton Green Shopping Centre	Mixed use (housing and town centre uses)	1,423
SA3.2	Chiswick Road Estate (Osward and Newdales)	Housing	299
<b>Angel Edmonton (PL4)</b>			
SA4.1	Joyce Avenue and Snells Park Estate	Housing (with some supporting non-residential uses such as social infrastructure)	1,188
SA4.2	Upton Road and Raynham Road Estates	Housing (with some supporting non-residential uses such as social infrastructure)	134
SA4.3	Langhedge Lane Industrial Estate	Mixed use (housing and reprovision	120
SA4.4	South-east corner of the North Middlesex University Hospital Trust, Sterling Way	Mixed use (housing and offices)	260
SA4.5	Public House 50-56 Fore Street London	Mixed use (housing and town centre uses at ground floor)	58
<b>Meridian Water (PL5)</b>			
SA5.1	Meridian Water Phase 1, Willoughby Way	Residential-led mixed use	977
SA5.2	Meridian Water Phase 2 (Orbital Business Park)	Residential-led mixed use	2,236
SA5.3	Former Ikea store	Residential-led mixed use	1,507
SA5.4	Tesco Extra, 1 Glover Drive;	Residential-led mixed use	819
SA5.5	Meridian 13 (Teardrop site)	Residential-led mixed use	356
SA5.6 <sup>39</sup>	Meridian East (Harbet Road)	Residential + light Industrial in new LSIS + intensified SIL area	815

<sup>38</sup> To be read in conjunction with Policy E1

SITE ALLOCATION REFERENCE	SITE ADDRESS	PROPOSED LAND USE	ESTIMATED CAPACITY
Southgate (PL6)			
SA6.1	Southgate Office Village 286 Chase Road.	Mixed use (housing and offices with a ground floor café)	200
SA6.3	Minchenden Car Park and Alan Pullinger Centre, 1 John Bradshaw Road, Southgate	Housing	33
New Southgate (PL7)			
SA7.1	Former Gasholder site between North Circular Road and Station Road	Mixed use (housing with ground floor commercial uses)	182
SA7.2	Aldi (formerly Homebase), Station Road, New Southgate	Mixed use	203
SA7.3	Ladderswood Estate	Housing with some supporting non-residential uses such as social infrastructure	107
SA7.4	Arnos Grove Station Car Park	Housing (with some non-residential uses i.e. café/retail)	162
SA7.5	Coppice Wood Lodge	Housing	45
Palmers Green (PL8)			
SA8.1	Morrisons, 19 Alderman's Hill	Mixed use (housing and supermarket)	130
SA8.2	Lodge Drive Car Park (including the Depot)	Housing	124
SA8.3	Corner of Green Lanes and the North Circular	Mixed use (housing with the re-provision of existing use)	129
SA8.4	Travis Perkins, Bridge Drive, Broomfield Lane	Mixed use (housing with re-provision of existing use)	84

SITE ALLOCATION REFERENCE	SITE ADDRESS	PROPOSED LAND USE	ESTIMATED CAPACITY
Chase Park (PL10)			
SA10.1	Chase Park South	Housing including older persons (with supporting non-residential uses such as social infrastructure) - large scale new settlement	Approximately 3,600 homes in total of which 2,550 within the plan period including 95 homes for older persons
SA10.2	Arnold House (66 Ridgeway) & Land to the rear of 66 The Ridgeway (west)		
SA10.3	Chase Park North East		
SA10.4	Chase Park North West		
Crews Hill (PL11)			
SA11.1	Crews Hill North West	Housing (with supporting non-residential uses such as social infrastructure) - large scale new settlement	Approximately 5,500 homes in total of which 3,350 within the plan period
SA11.2	Crews Hill South West		
SA11.3	Crews Hill; North East		
SA11.4	Crews Hill		
SA11.5	Crews Hill South		
SA11.6	Crews Hill East		
Other proposed site allocations outside of the place making areas (urban areas)			
URB.01	Land known as Brimsdown Sports Ground	Housing with supporting non-residential uses to support open space	225
URB.02	Cockfosters Station Car Park	Housing	351
URB.03	Former Chase Farm Hospital	Housing with some supporting non-residential uses such as social infrastructure)	344
URB.04	Blackhorse Tower	Housing	216
URB.05	New Avenue Estate	Housing with some supporting non-residential uses such as social infrastructure)	204
URB.06	Former Middlesex University, Trent Park	Community uses with a limited amount of other enabling uses such as housing	251

SITE ALLOCATION REFERENCE	SITE ADDRESS	PROPOSED LAND USE	ESTIMATED CAPACITY
URB.07	Sainsburys Green Lanes	Mixed use (housing and supermarket)	368
URB.08	Hoe, Eastfield, Cherry and Bouvier Estates	Housing (infill)	240
URB.09	Exeter Road Estate	Housing with some supporting non-residential uses such as social infrastructure)	129
URB.10	Alma Estate	Housing with some supporting non-residential uses such as social infrastructure)	Estimated gross capacity of 1204 homes with 127 remaining (net) to be delivered
URB.11	The Former Royal Chace Hotel	Housing (including older persons)	64 C3 + 92 C2
URB.12	241 Green Street	Mixed use (housing and non-residential commercial use at ground floor)	92
URB.13	Hertford Road, Archers and Roman Way, Larksfield Grove Carterhatch, Lytchet Way and Sherbourne Avenue Estate,	Housing (infill)	199
URB.14	Four Hills Estate, Lavender Hill	Housing (infill)	99
URB.15	Kettering Road Estate	Housing (infill)	90
URB.16	188-200 Bowes Road	Housing	86
URB.17	Main Avenue Site	Housing (infill)	80
URB.18	Land at Ritz Parade	Mixed use	71
URB.19	Albany Leisure Centre and Car Park	Housing with some supporting non-residential uses and re-provision of leisure centre	85
URB.20	Cuckoo Hall Lane Estate	Housing (infill)	59
URB.21	Moorfields Health Centre	Housing with some supporting non-residential uses such as social infrastructure)	52



SITE ALLOCATION REFERENCE	SITE ADDRESS	PROPOSED LAND USE	ESTIMATED CAPACITY
URB.22	Oakwood Station Car Park	Housing	52
URB.23	Stoneleigh Avenue Estate	Housing (infill)	42
URB.24	Fore Street Estate	Housing (infill)	39
URB.25	Pevensey Avenue	Housing (infill)	36
URB.26	Fords Grove Car Park	Housing	29
URB.27	South Street	Housing (infill)	29
Other proposed site allocations outside of the place making areas (outside urban areas)			
RUR.01	Land opposite Enfield Crematorium (known as The Dell). Great Cambridge Road	Housing with some supporting non-residential uses such as social infrastructure	291
RUR.02	Land between Camlet Way and Crescent West, Hadley	Housing	160

## EXPLANATION

### Meeting housing targets

8.4 Enfield faces a number of substantial housing challenges which the plan aims to address. Like many other London boroughs, there is a significant need for housing of all types, especially affordable housing that aligns with the London Plan. This need has been exacerbated in recent years due to housing not keeping pace with housing targets, including the need for larger family homes set out in Enfield's Local Housing Needs Assessment 2020.

8.5 London's housing need was determined to be some 66,000 additional homes per year during the examination of the London Plan. However, while the London Plan 2021 sets out a requirement to 2029, there are complexities in planning for housing growth to the end of Enfield's plan period in 2041 and beyond, as set out in Chapter 2. With no clear target from the Spatial Development Strategy and the requirement to plan for 15 years in national policy, Enfield has taken a capacity-based approach to set its housing target post 2029, in line with Paragraph 4.1.11 of the London Plan. The approach is set out in more detail in the Housing Topic Paper (2024) and is calculated through the estimation of deliverable, developable and potentially

developable supply by drawing on: 1) the 2017 London SHLAA (for large sites); 2) rolling forward the housing capacity assumptions applied in the London Plan for small sites; 3) taking into account additional capacity as a result of any committed transport infrastructure improvements; and 4) identifying further local capacity in addition to the first point. This will also ensure that the NPPF requirement to identify land for homes is satisfied<sup>39</sup>. More detail is set out in the Housing Topic Paper (2024).

8.6 Enfield faces significant constraints on its housing capacity, particularly in the urban areas and including from the intensification of the existing housing stock through conversions and extensions. These challenges are elaborated on in more detail in the Exceptional Circumstances Topic Paper (2024). The Council is concerned about the demographic and social implications of building smaller homes and risks associated with the delivery of brownfield sites in urban areas in the timescales specified in the ELP.

8.7 Allied to this is the pressing need for more affordable housing in Enfield for the most vulnerable residents, compounded by the presence of over 3,000 households living in long term temporary accommodation,

and over 100 families living in hotels. In simple terms, Enfield Council needs to be able to source around 50 homes per month to meet the needs of those households newly approaching the Council for emergency accommodation. To reduce the use of hotel accommodation the Council requires a minimum of 100 properties per month. The Council's current ability to source around 10 properties per month within an hour and a half travel of Enfield falls significantly short of these requirements. Given the mixed tenure cross subsidy model required to build affordable housing today, delivering a larger number of market homes than are currently built is critical to delivering a higher amount of affordable housing to enable families to be moved out of temporary accommodation in Enfield, particularly those in hotels and hostels without proper access to facilities for families.

8.8 Enfield faces significant housing challenges, and the plan addresses these head-on by providing high amounts of affordable housing, primarily through brownfield land in urban areas and reliable sources like windfall schemes on small sites under 0.25 hectares. However, post-2029, housing delivery is projected to decline significantly without the development of Green Belt sites proposed in the ELP. These Green Belt sites play a crucial role in meeting Enfield's housing needs, especially in delivering larger family-sized and affordable homes. Additionally, they help mitigate the delivery timescale risks associated with the largest brownfield sites, which Enfield heavily relies on. Detailed analysis of site phasing is available in Chapter 5 of the Housing Topic Paper (2024).

8.9 There is a strong commitment in Enfield to address the housing crisis by dramatically increasing the supply of

<sup>39</sup> NPPF (2023), paragraph 69 provides that the Local Plan should identify specific deliverable sites for year 1-5 and specific deliverable developable sites for years 6-10 and where possible years 11-15.

homes over the next five to ten years and sustaining high delivery over the coming decades. This is expected to bring substantive changes to housing conditions for the Borough's residents and can initiate a chain reaction that benefits residents across all income levels, particularly those in need of affordable housing.

8.10 While it is acknowledged that Enfield faces a number of significant housing challenges, ELP policies are designed to tackle them directly. These policies aim to deliver substantial amounts of affordable housing while providing a suitable mix of homes that align with local needs, as detailed in Chapter 7 of the Housing Topic Paper. The supply of land is considered alongside estimated needs to formulate the proposed spatial strategy, complemented by various strategic and non-strategic policies that guide sustainable housing development in the Borough.

8.11 Policies in the Plan aim to accommodate a significant increase in housing provision over the plan period. This includes ongoing efforts to identify emerging windfall sites and collaborations with other agencies, such as the Greater London Authority, to optimally utilise surplus land and facilities to meet housing needs. Furthermore, the plan involves working

with Neighbourhood Plan groups to identify additional housing sites. The total housing supply for the Borough over the plan period is indicated in Table 8.2 and comprises homes from various sources in addition to the Site Allocations specified in Policy H1.

8.12 Informed by the spatial development strategy, the anticipated distribution of housing makes provision for approximately 34,710 new dwellings over the plan period up to 2041. A significant proportion of new dwellings needed to meet this target will be delivered by sites allocated for housing in the urban area and a number of Green Belt sites to accommodate new dwellings. This approach recognises the need to support the delivery of larger units and increasing the provision of affordable homes. Housing development will come forward on sites allocated for housing as well as windfall sites in the area over the plan period. Policy H4: Small sites and smaller housing development sets out the estimated supply of housing from small sites and the council's approach to their delivery.

8.13 The Council expects a high proportion of developments in urban areas to be in the form of flatted developments and therefore rely on lower density greenfield developments to deliver more family housing.

8.14 As explained in chapter 2 of the plan, a phased/stepped housing trajectory is supported in certain circumstances both in the London Plan and the NPPG on Housing Supply and Delivery as set out in Figure 2.3 of the plan.

**Table 8.2:** Housing supply – sources of supply over the plan period up to 2041 (net number of homes)

CATEGORY	PLAN PERIOD 2019-2041	BEYOND PLAN PERIOD
Completions since 1 April 2019	2,148	
Allocations (as defined in Strategic Policy SP H1: Housing development sites and including a number of consented schemes)	27,374	3,449
Other deliverable sites identified in the Housing and Employment Land Availability Assessment (HELAA)	1,558	
Other developable sites identified in the Housing and Employment Land Availability Assessment (HELAA)	1,021	
Unidentified small windfall schemes	2,839	
Estimated lapses	-935	
Total	34,710	38,159

## STRATEGIC POLICY

# H2: AFFORDABLE HOUSING

1. The Council will actively work with Registered Providers to maximise the provision of affordable housing in the Borough and will aim to secure 50% of all new homes, based on habitable rooms, over the plan period as genuinely affordable.
2. Affordable housing requirements will be calculated based on proposed gross housing floorspace and will be applicable to new developments on sites that comprise ten or more new housing units or a combined proposed gross floorspace exceeding 1,000 square metres. The specific requirements are as follows:
  - a. for developments on industrial land that would result in a net loss of industrial floorspace, a minimum of 50% affordable housing is required;
  - b. On former Green Belt sites, including the proposed rural placemaking areas at Crews Hill and Chase Park, a minimum of 50% affordable housing is required;
  - c. For all other major housing developments, a minimum of 35% affordable housing is required;
  - d. on publicly owned land subject to suitable portfolio agreements aimed at achieving a minimum of 50% affordable across a mix of sites.
3. The provision of affordable housing should be provided in line with the guideline mix, consisting of 50% social/affordable rented housing and 50% intermediate housing. Some flexibility in the tenure mix may be considered, particularly in cases where developments propose more than 50% affordable housing, subject to viability assessments.
4. Proposals that involve the loss or demolition of existing affordable housing floorspace, including estate regeneration schemes, will be required to replace at least the same amount of affordable housing floorspace, with an emphasis on achieving an uplift in provision wherever possible. Estate regeneration schemes will be expected to reflect the existing mix of affordable and family housing while considering the particular needs of existing and future tenants, including specialist housing.
5. Development involving the provision of affordable housing will be required to:
  - a. achieve the same high-quality standards as the private housing element of the scheme in terms of accessibility, internal space requirements, external appearance and design quality and provision of private outdoor space. In cases where it is feasible, grant funding should be used to maximise the delivery of affordable housing; and
  - b. provide affordable housing on-site within residential and mixed-use schemes. In exceptional circumstances, off-site provision or contributions of broadly equivalent value will be considered acceptable. This may occur where it:
    - i. avoids an over-concentration of a single type of housing, both on and off-site, to promote mixed and balanced communities; and/or
    - ii. secures a greater proportion of affordable units overall; and/or
    - iii. offers the best way of delivering affordable homes, including a greater level of social-affordable rented family homes.
6. Residential proposals that meet or exceed the thresholds specified in Policy H5 of the London Plan 2021 will not be required to



provide viability evidence and will follow the Fast Track Route (FTR). Only those proposals that cannot meet the threshold levels and the 50% social/affordable rented homes and 50% intermediate local requirement, will be required to undertake the Viability Tested Route (VTR). They must submit viability information and will be subjected to review mechanisms outlined in Policy H5 of the London Plan.

7. To maximise affordable housing delivery, review mechanisms will be used over the lifetime of the development in line with relevant London Plan guidance. For schemes following the Viability Tested Route (VTR), the following provisions will apply:
  - a. An Early Stage Viability Review will be required if an agreed level of progress on implementation is not achieved within two years of the permission being granted or within a period agreed upon by the Borough.
  - b. A Mid Stage Viability review at an appropriate date agreed with the authority, particularly for the largest schemes building out over long periods with multiple phases.
  - c. Late Stage Viability Review will be triggered when 75 per cent of the units within a scheme are sold or let, or within a period or other trigger agreed upon by the Borough.

## EXPLANATION

- 8.15 Enfield is currently faced with a shortage of social and affordable rented homes, leading to an increasing number of individuals with low incomes finding accommodation in the private rented sector. This lack of affordability and housing stability in the local private rental market has contributed to a growing homelessness problem and many people living in inadequate housing. Furthermore, the population of Enfield is on the rise, and more households have low incomes.
- 8.16 Concurrently, there has been a notable increase in private sector rents and the number of privately rented homes within the Borough. This has led to a rising number of individuals with low incomes living in precarious rental arrangements, often facing substandard housing conditions. Data from the Census 2021 indicates that 53.4% of people in Enfield, either own their homes, have a mortgage, or are in shared ownership, marking a decline from the 2011 figure of 58.8%. Moreover, the average sale price of homes in Enfield for 2022-23 stood at £560,997.
- 8.17 Whilst there is a record of housing delivery in Enfield, not everyone is able to access housing that is affordable within their financial means. Affordability is a major concern for those on the

lowest earnings, especially first-time buyers. On average, house prices are over fourteen times the average salary in Enfield. Consequently, many lower paid and lower skilled positions are filled by people who cannot afford to live in the Borough, leading to increased commuting. This situation creates an environment where smaller, privately rented properties are often the only feasible option for residents faced with high costs and a shortage of affordable properties. In the private rented sector, the average households spend over 45% of their gross income on rent, this is a much higher percentage of their net disposable income than would be spent if they were owning or renting from a registered provider. This has led to Enfield having one of the highest percentages of adults claiming housing benefit in London, well above the national and the London averages. These cumulative issues have contributed to acute issues of overcrowding and homelessness in the Borough, as evidenced by the number of extensive households on the Council's Housing Register. At the time of writing, approximately 6,000 households are on the housing waiting list, representing approximately 5% of households in the Borough. In short, the gap between incomes and housing costs is rapidly widening, highlighting a significant local need for affordable housing.

<sup>40</sup> This is based on 2021 census data; Enfield has around 120,900 households

8.18 The Whole Plan Viability Assessment found significant disparities in viability across different geographical areas within the Borough. As a result, it indicated that an area-based approach to housing tenure may be justified. The Enfield Whole Plan Viability assessment (April 2021) found that greenfield land in higher value areas of the Borough is likely to support higher levels of affordable housing, potentially up to 50% and substantial levels of developer contributions of at least £50,000 per unit, in addition to the current rates of the Community Infrastructure Levy (CIL). These findings suggest affordable housing on greenfield land is more viable both in terms of quantity and as a proportion of the overall housing offering, compared to other parts of the Borough. In light of these findings, we have set a 50% affordable housing target for housing schemes involving development on Green Belt land, aiming to secure the much-needed family sized affordable homes in those areas.

8.19 The affordable housing policy in this plan is informed by the findings of both the Local Housing Needs Assessment (2020) and the Whole Plan Viability assessment findings.

## Draft Policy H2 Affordable Housing Approach

8.20 The ELP aims to achieve a Borough wide target of 50% affordable from the overall target of 1,246 new homes per year. This equates to a goal of 623 affordable homes per year, a substantial increase compared to the 224 affordable homes set out in the Core Strategy of 2010. Policy H2 plays a crucial role in determining affordable housing requirements based on the typology and location of development. It requires estate regeneration schemes, Council-owned sites, developments resulting in the loss of industrial floorspace, and housing developments in the Green Belt to provide a minimum of 50% affordable housing. For all other major developments, the policy sets a minimum requirement of 35% affordable housing. This approach is in line with the London Plan, and informed by the Council's Whole Plan Viability assessment. The draft Plan does not only increase the requirement for affordable housing but also ensure that the homes are built to deliver the community's aspirations. Planning applications that fully comply with Policy H2 are expected to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for viability assessment at the application stage, and if submitted,

these assessments must reference the viability assessment that informed the plan and account for any changes since then. Viability assessments should be carried out in line with planning practice guidance 10, paragraphs 007 and 008.

8.21 The draft ELP follows the threshold approach to affordable housing and viability set out in the London Plan. The target of 50% affordable housing represents a minimum target for all qualifying housing proposals. The guidance for determining affordable housing provisions is drawn from various sources, including Enfield Local Housing Needs Assessment, Enfield Intermediate Housing Policy, the London Plan, and the National Planning Policy Framework (NPPF). These documents collectively inform the Borough's position on affordable housing and help ensure that the housing needs of the local community are addressed effectively.

## Tenure mix

8.22 According to the Enfield Local Housing Needs Assessment (LHNA) of 2020, there is an estimated requirement for 1,407 affordable homes a year to address both the need for affordable/social rented accommodation need (i.e. 711 homes) and affordable home ownership or intermediate rented

<sup>41</sup> <https://new.enfield.gov.uk/services/planning/evidence-base/>

<sup>42</sup> The western and northern areas of the Borough (Chase, Cockfosters, Highlands, Grange, Palmer's Green, Southgate, Winchmore Hill)

<sup>43</sup> <https://governance.enfield.gov.uk/documents/s82460/Intermediate%20Housing%20Policy%20-%20FINAL.pdf>

accommodation (i.e. 696 homes). In light of this, the policy approach suggests a balanced distribution of 50% social/affordable rent and 50% intermediate housing, in line with the London Plan. This means prioritising the following forms of genuinely affordable homes:

- Homes based on social rent levels, including London Social Rent and London Affordable Rent
- London Living Rent
- London Shared Ownership

8.23 The proposed development's tenure mix will be expected to reflect the preferred mix set out in policy H2, acknowledging that rigid application of these requirements may not be appropriate in every case. It is not considered sound or appropriate to prescribe specific forms of intermediate housing product to be introduced on individual development sites. Therefore, the policy approach retains a degree of flexibility. When applications do not meet the specified amount of affordable housing as set out in policy H2, proposals will undergo detailed viability assessments to demonstrate that achieving these targets cannot be viably achieved. The findings from the Whole Plan Viability assessment indicate that, based on current values, having a proportion of social rented housing

exceeding 50% would not be viable in most parts of Enfield.

8.24 Other forms of affordable housing including community led housing as addressed in Policy DM H6, will also be encouraged, if they meet the definition of genuinely affordable in the London Housing Strategy meet the criteria for being genuinely affordable.

### First Homes

8.25 First Homes are a specific type of discounted market sale housing and for planning purposes, they should be considered to meet the definition of 'affordable housing'.

8.26 These homes will need to be discounted by a minimum of 30% compared to their market value. They will be exclusively available to first time homebuyers whose household income in Greater London is below £90,000 and the purchase should involve at least a 50% mortgage on the First Home. The Council will be required to secure a minimum of 25% of all affordable housing units through developer contributions, ensuring that they are designated as First Homes in perpetuity. Our affordable housing policy requirements allow for the incorporation of the government's policy regarding First Homes to be taken on board when negotiating affordable housing.

8.27 In Enfield, it is anticipated that First Homes may not fully satisfy the criteria for affordable housing. The expenses associated with building First Homes, particularly considering the level of discount required, are unlikely to render schemes financially viable. Consequently, there is a preference for shared ownership housing where it is appropriate. This position aligns with the Mayor of London's Housing Strategy (2017) and the relevant funding programme arrangements. If developers intend to provide First Homes, they will need to show that these homes are genuinely affordable for local residents and that they will provide to the same level as they would for other housing options, in line with the guidance provided in Planning Practice Guidance.



Terraced Housing, Blagdens Lane, Southgate by GML Architects.

## DEVELOPMENT MANAGEMENT POLICY

# H3: HOUSING MIX AND TYPE

1. The provision of new homes both in the market and affordable sectors should contribute to meeting the needs of current and projected households, having regard to the following:
  - a. the need to provide an appropriate mix of dwelling types and sizes, reflecting the most up to date evidence as set out in the Local Housing Needs Assessment (2020) or any succeeding documents;
  - b. the character of the development in the context of the site and surrounding area, taking account of accessibility arrangements and amenity considerations such as child density;
  - c. the site's location and physical characteristics of the site, including any identified constraints on the preferred housing mix;
  - d. the overall viability of the development taking into account of abnormal costs and specific characteristics within certain sectors, such as build-to-let housing;
  - e. the potential to introduce flexibility in the mix of market units that could lead to the delivery of additional affordable housing;
  - f. the need to optimise housing delivery on sites through the provision of appropriately sized homes in line with the London Plan;
  - g. with the exception of intermediate housing units and specialist elderly accommodation, development should provide:
    - i. a minimum of 20% of units must consist of two bedrooms, and 30% must comprise homes that meet the London Plan definition of family housing<sup>45</sup>
    - ii. for affordable housing schemes on publicly owned sites and areas released from the Green Belt, a minimum of 20% of units should be two bedrooms, while 40% should meet the London Plan definition of family housing.
2. All forms of self-contained living accommodation, including the conversion of single dwellings into flats will be required to meet and, where possible, exceed the internal and external space standards set out in the London Plan and the Nationally Described Space Standard.

### Self-contained units

### Accessible, efficient and inclusive design

3. At least ten per cent of new dwellings should be built to the M4(3) wheelchair accessible dwelling standard in accordance with Building Regulations.
4. All new residential developments should be designed with a 'tenure-blind' approach, ensuring the equitable distribution of tenure types throughout the development to prevent concentrations or clear distinctions and offer choice to all residents
5. Development proposals should demonstrate the consideration of housing types and mix and demonstrate how dwellings have been designed to be adaptable.

<sup>44</sup> The London Plan 2021 defines Family housing as "A dwelling that by virtue of its size, layout and design is suitable for a family to live in and generally has three, four, five, or more bedrooms."



## EXPLANATION

- 8.28 Policy H3 aims to provide guidance on the tenure mix of new housing developments, placing particular emphasis on the need for larger homes i.e. those with 3 bedrooms or more. This emphasis is informed by Enfield's Local Housing Needs Assessment (LHNA), which assesses the specific housing needs of the Borough, and the London Plan definition of Family Housing, which by virtue of its size layout and design is suitable for a family to live in and generally consists of three or more bedrooms. The policy also allows for flexibility in cases of retirement, sheltered, or extra care housing developments, with deviations from the policy requiring evidence justifying different priorities within the development's local context.
- 8.29 The LHNA indicates a demand for larger homes, especially in the social and affordable rent sector, where there is a particular need for two and three bedroom homes. In the market sector, there is high demand for family-sized three and four-bedroom homes. The LHNA also categorises the priority of dwelling sizes for social-affordable rented properties, with two and three-bedroom units having high priority, one-bedroom units with medium priority, and four or more-bedroom units with low priority. There can be instances

where the size of homes being delivered (in terms of floor area) goes far above nationally described space standards. In these cases, consideration must be given towards site optimisation in line with the London Plan Policy H3.

- 8.30 For affordable ownership, the recommendation is to focus on one and two-bedroom housing units, as these cater to households without children. However, there is still some demand for family-sized intermediate housing.
- 8.31 The largest demand in the market sector is for three and four-bedroom homes, reflecting demographic changes in the Borough. While two-bedroom flats may suit some families, there is a strong need and demand for larger homes. Nevertheless, delivering the desired housing mix in Enfield, especially in lower-value areas where providing sufficient affordable housing in low-density schemes is challenging, remains a significant challenge. This is due to lower residential sales values in these areas, even when construction costs and land values remain relatively constant.
- 8.32 An examination of the southeastern part of the Borough showed that the prices of new-build three-bedroom flats were higher than existing houses in the region, creating pricing challenges. In

areas with residential densities exceeding 150 dwellings per hectare, achieving the desired housing mix presents design and viability challenges. Additionally, construction costs rise with increased building height and density, whereas sales values do not necessarily follow the same trend.

- 8.33 Consequently, it is expected that a lower proportion of three-bedroom homes will be included in new site allocations, falling below the LHNA target. Traditionally, the majority of new homes in Enfield have been one and two-bedroom properties. To address these challenges, there is a proposal to adjust the housing mix requirement for strategic Green Belt sites, allowing for a higher proportion of family-sized homes. Initial viability assessments suggest that these areas may be more economically viable for this type of development. However, this adjustment alone may not fully meet the LHNA target and may not align with the land use optimisation and mixed, balanced community requirements of the National Planning Policy Framework (NPPF) and the London Plan.
- 8.34 The proposed housing mix for Green Belt sites, specifically Crews Hill and Chase Park, places a greater emphasis on larger homes, with family housing typically comprising 3-bedroom homes comprising 47% of the mix and 4-bedroom homes representing 24%. Further details can be found in the Housing Topic Paper (2024).

## DEVELOPMENT MANAGEMENT POLICY

### H4: SMALL SITES AND SMALLER HOUSING DEVELOPMENT

1. The Council will support the construction of well-designed new homes on appropriate small sites, including on vacant infill areas and backland plots, upward extensions of flats and redevelopment of non-residential buildings, in line with London Plan Policy H2. The objective is to seek to achieve the London Plan's target of 3,530 new homes (equivalent to 353 new homes per year until 2029) on sites of less than 0.25 hectares.
2. Housing development and intensification on small sites will be particularly supported in the following locations:
  - a. sites with good public transport accessibility (e.g. PTAL 3-6);
  - b. sites located within 800 metres of a tube, rail station, or the boundary of a major, district or town centre as defined on the Policies Map;
  - c. sites with good local infrastructure including local centres, local shopping parades, local schools and community facilities; and
  - d. places with planned infrastructure improvements that will significantly improve PTAL and walking / cycling accessibility over time.
3. New residential development on small sites must be carefully and creatively designed to avoid harm to amenity of surrounding properties and uses, especially in terms of outlook, privacy, and access to daylight and sunlight. Innovative design solutions should be used to optimise housing density, land use and the provision of family housing where appropriate. This may involve using housing typologies like the use of courtyard and mews housing, rooftop and terraced amenity spaces, shared spaces and facilities, provision of basement/undercroft parking and the redevelopment of vacant/underused spaces, such as single-storey garages, external service yards and incidental amenity space.
4. To facilitate the appropriate development of small sites for housing, including through the sensitive intensification of existing buildings and sites, the Council will prepare design and characterisation guidance as appropriate. Proposals will be expected to have regard to this planning guidance, where relevant and demonstrate how it has been used to inform the development through the design-led approach.
5. Where small housing development is proposed it should not have an unacceptable adverse impact on biodiversity and green infrastructure. Applications will be expected to identify potential impacts in this regard, and clearly set out measures to minimise and mitigate these. Potential measures include the return of hard standing into green spaces, installing green and brown roofs and green walls, tree planting, creating biodiversity-friendly habitats for instance bird boxes, and sustainable landscaping. In exceptional circumstances, where on-site measures are not feasible due to site constraints, then off-site provision (for example, tree planting) may be acceptable in order to ensure policy compliance. Off-site provision will be secured on a case-by-case basis through the use legal agreements and/or planning contributions.

## EXPLANATION

8.35 Aligned with the London Plan, small sites and housing developments under 0.25 hectares will play a crucial role in both new home delivery and neighborhood enhancement. This policy aims to foster well-designed housing projects on such sites, accommodating up to 25 homes. These developments encompass various housing types, including apartment buildings, backland and infill developments, and communal living arrangements. The plan outlines provision for approximately 6,920 homes on these small sites, with 1,516 homes already completed since 2019, and an additional 1,797 homes identified but not meeting the allocation threshold. An estimated 3,607 homes are expected from further unidentified small windfall sites, thereby exceeding the London Plan's small sites target.

8.36 Development of small sites will be supported in areas with good access to public transport and close to existing local infrastructure and services offered within town centres. Efforts are being made to encourage small site intensification, especially within town centres, through various mechanisms such as land assembly powers, housing renewal schemes, site acquisition by housing companies, direct funding, and the designation

of housing zones. Encouragement is provided for developers and landowners to collaborate, promoting the development of small sites through area-based design codes or master planning exercises, thereby maximising redevelopment and intensification opportunities along the Borough's linear high street corridors and town centres. Applicants should also reference design guidance from the Mayor of London and relevant supplementary planning documents to inform the design and layout of small-scale housing developments in suburban and urban areas of the Borough.

8.37 The Housing and Economic Land Availability Assessment (HELAA) offers up-to-date information regarding small sites, measuring up to 0.25 hectares, available in the Borough. This includes sites with existing planning permissions, outline planning permissions, and sites without planning permission, all of which have the potential to accommodate up to 25 new dwellings.

8.38 This policy's objective is to promote high-quality housing developments that respect the Borough's character and cater to diverse needs. There are several opportunities and types of small sites that can support new housing development, including vacant and underused brownfield

sites and redundant ancillary facilities such as garages or residential storage units. However, these sites are often constrained by factors like irregular plot shapes, site access challenges, or land-use designations. As such, the majority of small site development is anticipated to occur in existing residential areas, where new homes can be thoughtfully integrated with other compatible uses. Various forms of housing development on small sites are possible, including new construction, infill and backland development, conversion (subdividing houses into flats), demolition and redevelopment, or extensions to existing buildings (such as upward, rear, and side extensions, and basement development).

8.39 The Borough's approach to housing development on small sites aims to facilitate gradual intensification within existing residential areas, particularly when these sites are located within 800 meters of a station or town centre. The growth and development in these areas should enhance the local character of Enfield's neighbourhoods, with a design-led approach that respects and enhances distinctive features.

8.40 The Enfield Character of Growth Study (2021) identifies areas primed for increased small housing development, taking into account factors such as existing urban fabric, historical evolution, building typologies, and spatial strategic growth and regeneration priorities across the Borough. This study categorizes areas based on their sensitivity to change, emphasising local character. All small housing development proposals are expected to consult this document as a foundation for understanding the scope for intensification in a given area and recognising key features of the local character.

8.41 This study should be used in conjunction with other design guidance to ensure that development is compatible with the site and its surroundings. The Council will create and provide a collection of guidance documents to assist with the implementation of this policy, including existing and future Conservation Area Appraisals and Management Plans. Additionally, the Council will develop a Borough-wide Design Guide / Design Code that will incorporate guidance on sensitively intensifying suburban neighbourhoods.

8.42 The development of small sites plays a substantial role in the ELP's housing trajectory. The Council will oversee progress towards the small site housing target through the Authority Monitoring Report and evaluate this policy's effectiveness during the ELR review process. Monitoring will also yield information regarding the spatial distribution of new small site housing development, allowing for necessary interventions to ensure that areas with a concentration of such development receive appropriate support through community facilities and other strategic infrastructure via the Council's Infrastructure Delivery Plan.



Perry Mead, Peter Barber Architects



## DEVELOPMENT MANAGEMENT POLICY

# H5: SUPPORTED AND SPECIALIST HOUSING

1. The Council will facilitate the provision of appropriate housing with care homes and where appropriate retirement housing to meet the specialist and supported needs of vulnerable people in Enfield, with a focus on creating specialist housing for elderly people. The Council will achieve this by:
  - a. supporting development that allows people to live as independently as possible, while also meeting the identified local needs within the Borough, with a target audience being Enfield residents;
  - b. providing housing options at a range of costs to accommodate the different financial circumstances of residents, in line with evidenced local need. This includes allocating a proportion of affordable specialist housing units on-site or a contributing towards addressing the identified need for affordable specialist housing elsewhere in the Borough; and
  - c. requiring the provision of affordable housing within the category of sheltered and extra care accommodation falling within use class C3.
2. Supported and specialist housing development should:
  - a. contribute to the creation of a mixed, balanced, inclusive and sustainable neighbourhood;
  - b. be well integrated into the wider neighbourhood and protect the amenity of neighbouring residents, following the agent of change principle;
  - c. be delivered through partnership arrangements between the developer and an appropriate support service provider;
  - d. be suitable for the intended occupiers in terms of the standards of facilities, design of buildings, density, parking provision; internal space and amenity space;
  - e. provide the necessary level of supervision, management, care and support services;
  - f. have arrangements in place for appropriate long-term management of the housing; and
  - g. offer easy access to community facilities, and be conveniently located near public transport, workplaces, shops and services appropriate to the needs of the intended occupiers.
3. Other forms of specialist housing for older persons falling into use Class C2 but meeting the definition set out in the London Plan, will be expected to deliver the following requirements:
  - a. provide affordable housing in accordance with policy H2 Affordable housing; and
  - b. incorporate accessible housing features to accommodate the needs of a diverse range of occupants.
4. The loss of supported and specialist accommodation will be resisted, unless:
  - a. an adequate replacement housing option can be provided; or
  - b. it can be demonstrated that there is a surplus of specialist accommodation in the area; or
  - c. it can be demonstrated that the existing supported or specialist accommodation is unable to meet relevant industry standards for suitable accommodation in a cost-effective manner.
5. In cases where the loss of supported and specialist accommodation is acceptable

in line with Part 4 above, proposals will be expected to secure the re-provision of an equivalent amount of residential floorspace, including affordable housing, where appropriate.

6. Proposals for care home accommodation will be supported where they are well connected and designed to a high-quality standard, having regard to other policies in the plan. The agent of change principle will be applied to new specialist and supported accommodation, with due regard to existing land uses in the area. In addition, proposals must ensure that 100% of habitable rooms are wheelchair accessible.
7. Any development that results in the net loss of floorspace for care home accommodation will be assessed having regard to the requirements set out in Part 4 of this policy.
8. To ensure inclusive and mixed neighbourhoods and communities, proposals must not result in a harmful overconcentration of supported and specialist accommodation within the locality. This includes instances where proposals are situated adjacent to existing provision or would create an imbalance with other residential uses in the vicinity.

## EXPLANATION

- 8.43 The Council is committed to protecting and empowering the most vulnerable residents in the Borough. The ELP's foremost priority is to assist local residents in maintaining their residency in their own homes through additional support and necessary adaptations. This includes the provision of new homes offering a wide range of tenures, types and sizes of housing to meet the needs and demands of different people in the community. This effort includes the development of new housing tailored for elderly people and those with disabilities (as outlined in this policy DM H5), as well as the accommodations for the travelling community (as outlined in policy DM H10), students (as outlined in policy DM H9), and others in the community with specialist housing needs. The design and implementation of these new residential units will consider the specific need of the local population, aiming to provide a genuine choice of housing options and promote the creation of sustainable, balanced and mixed communities.

## Specialist accommodation

- 8.44 The National Planning Policy Framework (NPPF) in paragraph 66, highlights the importance of considering and accommodating the diverse housing needs of various distinct household

groups. These groups encompass a wide range of individuals, including those seeking affordable housing, families with children, elderly individuals, students, people with disabilities, service families, travellers, renters, and those looking to build their own homes.

- 8.45 As further explained in paragraph 017 of the Planning Practice Guidance (PPG), the housing needs of specific groups often extend beyond the overall housing need figure calculated using the standard method. This is because the needs of these groups are based on the entire population of an area, rather than just the projected new households used in the standard method. When formulating policies to address the requirements of these specific groups, strategic policy-making authorities must find ways to meet the needs of these individual groups while still adhering to the constraints imposed by the overall established need.

- 8.46 The Local Housing Needs Assessment (LHNA) of 2020 has identified housing needs within these demographic groups, with a focus on two groups with significant and potentially increasing needs: firstly, elderly individuals and secondly those requiring specialised accommodation.

8.47 The population of individuals aged 65 and above is projected to increase by approximately 50% from 2018 to 2036, according to both the Office for National Statistics (ONS) and Greater London Authority (GLA) population projections. The most significant proportional growth is expected in the age group of 85 and above, with a projected increase ranging from 70% to 80%, depending on the specific projection data considered. These trends align with findings in the Enfield Joint Strategic Needs Assessment.

8.48 According to the 2014-based household projections from the Ministry of Housing, Communities & Local Government (MHCLG), the number of households led by individuals aged 60 and above is expected to increase by 28,498, marking a growth of 67.0% from 2018 to 2036.

### Types of supported and specialist housing

8.49 Currently, Enfield has approximately 3,556 specialised housing units designed for older individuals, comprising 1,345 units classified under residential care (C2 use class) and 2,211 units categorized as specialised accommodation for older persons (C3 use class). With the aging population, there is an anticipated rise in the

demand for specialised accommodation for older individuals. Projections using the 2016-based ONS and 2016-based GLA data suggest that the requirement for residential care (C2 use class) is projected to increase to a range of 737 to 755 units by 2036, while the need for specialized accommodation for older individuals (C3 use class) is expected to grow to a range of 1,212 to 1,242 units.

8.50 To determine the overall extent of disability and support needs in Enfield Borough, various data sources can be utilised. The analysis explores the potential requirement for specialized accommodations for different groups based on available data while identifying areas where understanding may be lacking.

8.51 According to the 2011 Census, an estimated 55,218 residents in Enfield reported being in fair or bad/very bad health, representing 17.8% of the population. This figure is slightly lower than the national average of 18.3% for all of England. The Census also revealed that around 21,262 residents (6.9%) reported significant limitations in their daily activities, a rate below the 8.3% for England as a whole.

8.52 Extrapolating national disability prevalence rates to Enfield suggests that the percentage of the population

with a disability is anticipated to rise from 18.9% of residents in 2018 to 20.9% by 2036. This increase is projected to amount to an additional 15,864 individuals over this period.

8.53 This evidence informs Policy H5 supporting a broader context for addressing the needs of older individuals, people with disabilities, and specific groups with unique requirements. A significant policy tool addressing the needs of these groups is the provision of more accessible and adaptable housing.

### Agent of change principle<sup>45</sup>

8.54 The provision of different types of specialist and supported housing to meet identified local demand, especially in new higher density developments, will require careful planning, design and the selection of suitable locations to ensure residents' needs are accounted for while ensuring they are seamlessly integrated into the new development. In some cases, the Council may require that the developer assumes responsibility for the future costs of soundproofing or otherwise mitigating the impact on proposed development from existing surrounding development, with this requirement being secured through a legally binding agreement.

<sup>45</sup> London Plan sets out how new developments can mitigate impacts from existing noise and other nuisance generating activities or uses on the proposed new noise-sensitive development. This is referred to as the 'agent of change principle'.

## DEVELOPMENT MANAGEMENT POLICY

# H6: COMMUNITY-LED HOUSING

1. Proposals for community-led housing schemes will be supported where:
  - a. a local need for this type of provision is clearly established;
  - b. optimal use is made of the site, contributing to the delivery of family and affordable housing in line with policy requirements, with a development density that is appropriate to the site, having regard to other policies in the plan;
  - c. provisions are made for affordable housing; and
  - d. the scheme is designed to a high standard, including sustainable design principles, integrates adequate amenity space, and makes a positive contribution to the local neighbourhood.

### EXPLANATION

- 8.55 The National Planning Policy Framework (NPPF) reflects the government's aim to promote self-build and custom housebuilding, making it a more mainstream housing option. Following the Self-Build and Custom Housebuilding Act 2015 and the subsequent Self-Build and Custom Housebuilding (Register) Regulations 2016, local authorities are required to maintain a register of individuals interested in acquiring serviced plots for self-build and custom build homes. Enfield currently manages a Local Self-build Register, which is open to both individuals and community groups seeking to construct their own homes. Presently, the register contains 225 individuals and 3 community groups interested in self/custom build projects. It is important to note that registration on this list does not require a local connection test or any associated fees.
- 8.56 Community led housing is a growing trend in London, driven by Community Groups with support from the Mayor of London (Community Led Housing Hub) and local initiatives such as Naked House in Enfield. Community-led housing can take several forms, including housing co-operatives, Community Land Trusts (CLTs), co-housing, and self/custom build housing. These approaches are not mutually

exclusive, and are often combined to address specific needs. This type of development demonstrates our commitment to addressing housing demand within the Borough, and we will continue to monitor our register in line with the relevant statutory requirements.

- 8.57 Community-led housing can provide a more affordable route to home ownership, promote more cohesive communities, and offer flexibility in accommodating specific housing needs, as shown by Older Woman's Housing Cooperatives such as OWCH. In Enfield, there is clear demand for housing solutions that go beyond what the market or the Council can provide in terms of affordability and housing typology.

- 8.58 Community-led housing projects can be implemented in a number of ways, including:

- start-up led by community-based housing organisations responding to housing demand or specific housing needs, involving groups of people aiming to construct their own homes;
- the extension of existing community-based housing organisations to offer housing alongside their current activities, for and on behalf of the community;
- partnerships with developers, housing associations, and local authorities to



support community groups in realising their housing ambition. Local authorities and developers can also play a role in facilitating the formation of such groups.

8.59 This policy supports self-build and custom-build housing proposals where they respond positively to the locality and contribute to the Borough's spatial strategy. All proposals must be designed to a high-quality standard and make provision for an element of affordable housing where required by policy. Given Enfield's projected demand for conventional housing, it is imperative that all developments, including self-build and custom build housing, optimises the use of sites to provide family housing, including through densities that are appropriate to the site location.

8.60 The Council has a statutory duty to maintain a register for self-build and custom-build housing and have regard to this register in its planning, housing and related functions. This serves as part of the evidence base informing the ELP's preparation, indicating the demand for serviced plots for self-build and custom-build housing from eligible individuals or groups. The Local Housing Needs Assessment (LHNA) has also assessed the demand for this type of provision, suggesting that the council should encourage the provision

of self and custom-build plots through policy and major allocations identified in the ELP. The LHNA also recommends utilizing suitable council-owned land or other available land controlled by willing landowners or developers to provide serviced plots to meet the demand.

8.61 Self-build, custom build, and community-led housing units contribute to the overall housing supply and diversify housing options. As a result, they are considered within the scope of our housing policy.

8.62 Consequently, our draft affordable housing policy endorses the delivery of this type of housing as part of affordable housing provision, provided it adheres to the defined criteria for genuinely affordable housing outlined in the London Housing Strategy.

## DEVELOPMENT MANAGEMENT POLICY

### H7: BUILD TO RENT

1. Proposals involving standalone build-to-rent (BTR) developments or build-to-rent blocks under unified management and as defined in the London Plan and associated guidance within large mixed tenure schemes will be supported where they:
  - a. deliver high quality housing and a mix of dwelling sizes that meet identified local and strategic housing needs as set out in relevant evidence;
  - b. offer tenancy agreements over at least a three-year period;
  - c. provide on-site affordable housing, to be retained in perpetuity in the form of Discounted Market Rent, at rental levels that genuinely qualify as affordable rent level, as defined by the Mayor of London;
  - d. commit to retaining these homes for at least 15 years, under covenant, and to be secured through a Section 106 legal agreement (a claw-back mechanism will apply in accordance with London Plan policy);
  - e. establish a review mechanism to address scenarios where policy compliant levels of affordable housing may not be financially viable, or provide a minimum of 35% affordable housing measured by habitable room. In such cases, a viability assessment will not be required, subject to early stage review; and
  - f. provide a management plan that commits to high standards in the ongoing management of the property and its premises, secured through a section 106 agreement.

### EXPLANATION

- 8.63 Inclusion of low-cost and London Living Rent homes within build-to-rent developments serves the purpose of aiding households with average incomes in their quest to save for a down payment to purchase their own homes. In Enfield, these schemes are obligated to maintain a covenant period of at least 15 years, ensuring their sustained contribution to addressing housing needs across all housing types in the Borough. A claw-back mechanism, in alignment with the London Plan policies and national build-to-rent guidelines, is enforced to safeguard the value of affordable housing provision, when such units within build-to-rent buildings be converted to a different tenure during the covenant period.
- 8.64 Build to rent represents a valuable addition, increasing the capacity of the housing sector to provide new homes. Conforming to the London Plan, Build to Rent (BtR) applications are required to adhere to specified levels of affordable housing provision.
- 8.65 Consistent with the London Plan guidelines, the Council will accept affordable housing provision in the form of Discounted Market Rent at genuinely affordable rental rates. Each Build to Rent application will be assessed based on the unique circumstances of the site to address local affordability needs. In general, the aim is for Discounted Market Rent levels not to exceed 70-80% of the market rent, with a preference for schemes catering to family households. This approach is detailed in the Council's Intermediate Rent Policy and can be integrated into planning policy.
- 8.66 The ELP is informed by up-to-date evidence, including viability assessments. The proposed affordable housing targets are formulated in response to the evidence from the LHNA while taking into consideration the overall quantity of affordable housing that various targets can potentially deliver.

## DEVELOPMENT MANAGEMENT POLICY

# H8: LARGE-SCALE PURPOSE BUILT SHARED HOUSING

1. The Council will support large-scale purpose built shared living development where the following criteria are met:
  - a. these developments are situated in areas well-connected to local services and employment by walking, cycling and public transport, and their design promotes non-car dependent lifestyles; and
  - b. they are under single management; and
  - c. all units are available for rental with minimum tenancy lengths of no less than three months; and
  - d. communal facilities and services are provided, sufficient to meet the requirements of the intended number of residents and include the following requirements:
    - convenient access to a communal kitchen; and
    - access to outside communal amenity space such as roof terrace and/or garden; and
    - internal communal amenity space such as dining rooms, lounges; and laundry and drying facilities; and
    - the private units provide adequate functional living space and layout, but are designed as self-contained homes or capable of being used as self-contained homes; and
- compliance with any relevant standards for this type of scheme set out in London Plan Guidance; and submission of a management plan along with the planning application; and
  - contribution of an upfront cash in-lieu payment towards conventional C3 affordable housing.
2. Developments are expected to provide a contribution in lieu of affordable housing in line with **Policy H2**.
3. All large-scale purpose-built shared living schemes will be subject to the viability tested route set out in the London Plan. However, developments which provide a contribution equal to 35 per cent of the units at 50 per cent discount of the market rent will not be subject to a late stage viability review.

## EXPLANATION

- 8.67 Large-scale purpose-built shared living developments generally consist of at least 50 units. However, schemes which seek to provide residential accommodation which does not meet space standards which are below this threshold will be expected to meet the detailed standards for communal spaces and private rooms set out in the latest London Plan Guidance. This type of housing falls into the sui generis use class and serves as an alternative housing option for single-person households who either cannot or choose not to live in self-contained homes.
- 8.68 While large-scale purpose shared living accommodation does not fall within C3 use class, it is still considered a form of housing like student accommodation. The number of bedrooms in such developments would be counted towards our housing targets. However, as the units within these accommodations may not meet the minimum housing space standards, they are not deemed suitable for providing affordable housing on their own. Therefore, in accordance with the London Plan, the Council expects purpose-built shared living accommodations to make an upfront cash contribution in lieu of affordable housing, subject to a viability assessment.
- 8.69 To ensure the ongoing quality of the accommodation, communal facilities, and services, as well as its positive integration into the surrounding communities, a comprehensive management plan must be prepared and submitted with the planning application. The agreed-upon management plan will be secured through a Section 106 agreement.

## DEVELOPMENT MANAGEMENT POLICY

# H9: STUDENT ACCOMMODATION

1. Proposals involving the development, redevelopment and/or intensification of purpose-built student accommodation will be supported where they:
  - a. contribute to meeting an identified strategic need, giving priority to local need;
  - b. secure the occupation by specific educational institutions. In cases where this possible, providers should, subject to viability, include an element of student accommodation that is affordable for students in the context of average student incomes and rents similar to those offered by London universities<sup>46</sup>.
2. All proposals for student accommodation must be situated in appropriate locations that:
  - a. are well-connected and have good levels of public transport accessibility (normally PTAL 4-6) and easily accessible by walking and cycling; and
  - b. are within or at the edge of town centres, or other locations that benefit from shops, services, leisure and community facilities appropriate to the student population.
3. All proposals involving the development, redevelopment and/or intensification of student accommodation must ensure a high standard of amenity for future occupiers and residents in the surrounding area. Proposals must meet all the following criteria:
  - a. provide a high-quality living environment including factors such as unit size, daylight and sunlight standards and well-integrated communal areas and facilities that would not have a detrimental impact on the amenity and character of the local area;
  - b. allocate at least 10% of student rooms that are readily adaptable for occupation by wheelchair users from the outset, following relevant guidance and best practice;
  - c. provide adequate on-site cycle parking facilities;
  - d. demonstrate that the accommodation will be exclusively occupied by students;
  - e. protect the amenity of adjoining and neighbouring areas; and
  - f. include a site management and maintenance plan, demonstrating how the accommodation will be managed and maintained throughout its lifetime to ensure an acceptable level of amenity and access to facilities for its occupiers while not give rise to unacceptable impacts on the amenities of existing residents in the neighbourhood.
4. The loss of existing student accommodation will be resisted unless it is demonstrated that the facility no longer caters to current or future needs and the floorspace is replaced by an alternative form of residential accommodation that meets other housing requirements outlined in the Local Plan.

<sup>46</sup> In line with London Plan policy H17: Purpose built student accommodation



## EXPLANATION

8.70 The higher education providers in London make a significant contribution to its economy and labour market. The Planning Practice Guidance (PPG) emphasises that local planning authorities need to plan for a sufficient supply of student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. The Local Housing Needs Assessment (LHNA) of 2020, recognised a relatively small population of student residents currently residing in the Borough, with only 221 residents currently living in such accommodation. Consequently, an assessment of their needs was not conducted.

8.71 This does not rule out the possibility of new student accommodation developments. However, it is essential that the siting of student accommodation provides residents with access to a wide range of services and facilities. During the site selection process, developers should prioritize locations near the educational institutions served by the development. When planning to meet the needs of students from outside the Borough, student accommodation should be appropriately located. The use of such developments should be in harmony with the amenity of neighbouring occupants

and the character of the area. To prevent speculative development and ensure that proposals genuinely address identified needs, new student accommodation should be secured for the occupation of students from one or more specific higher education institutions..

8.72 A minimum of 35% of purpose-built student accommodation should be designated as “affordable student accommodation” to enable students with an income equivalent to that provided to full-time UK students by state-funded sources of financial support for living costs to afford staying in student accommodation. The definition of affordable student accommodation, as outlined in the London Plan and supplementary guidance, will be applied. Affordable rent levels may undergo periodic reviews during the ELP’s lifetime, considering any significant changes to the government’s student maintenance loan regime.

8.73 New student accommodation must be of a high design and construction standards, incorporating functional layouts and well-integrated living and communal spaces and facilities, while meeting the latest industry standards. Unit sizes and layouts should vary, taking into account the needs of different groups, such as wheelchair users, mature students with families, students seeking individual accommodations, and

those using shared facilities. Whenever possible, the specific requirements of educational institutions should be accommodated..

8.74 While many students require accommodation during term time only, some use it as their permanent address. Therefore, student accommodation developments should allow for year-round occupation. To ensure viability, the Council will offer flexibility for temporary or ancillary uses during term breaks. Proposals will be assessed individually, and where acceptable in principle, the Council will use conditions or legal agreements to ensure that such temporary uses do not result in a material change of use of the building.

8.75 Student accommodation can bring benefits to Enfield’s neighborhoods and communities, supporting the local economy, complementing cultural industries, and stimulating inward investment. However, an over-concentration of student housing within a local area can negatively affect the amenity of existing residents and uses, undermining the goal of creating mixed and balanced communities. When the scale or concentration of student housing is likely to harm local amenity, the Council will either resist proposals or seek various mitigation measures to ensure the development is appropriate.

## DEVELOPMENT MANAGEMENT POLICY

# H10: TRAVELLER ACCOMMODATION

1. The Council will meet the identified need of at least 21 pitches over the plan period, for Traveller accommodation through the Traveller Local Plan.
2. Proposals for both transit and permanent provision including plots for Travelling Showpeople, will be required to demonstrate the following:

### Location and connectivity

- a. the site is in an area suitable for residential occupation and is well connected by sustainable modes of transport;
- b. the site provides convenient access to health care, retail and education school facilities with available capacity;

### Impact on environment and heritage

- c. the site is suitable where required for the undertaking of occupants' employment and entrepreneurial activities without detriment to adjacent occupiers' amenity;

### Occupational suitability

- d. the site is suitable where required for the undertaking of occupants' employment and entrepreneurial activities without detriment to adjacent occupiers' amenity;

### Safe access

- e. the site can be safely accessed by pedestrians, caravans and other vehicles;

### Integration with surrounding area

- f. the layout and boundary treatments of the development aim positively integrate with the adjacent townscape/communities; and

### On site utility provision

- g. The development ensures the availability of on-site utilities, including water resources and supply, waste disposal, and treatment. These utilities are provided for the benefit of residents while avoiding adverse impacts on the natural environment.

3. Due to the nature of this housing need, the Council will maintain continuing cooperation with neighbouring local planning authorities to identify the appropriate need and facilitate necessary provision.

## EXPLANATION

- 8.76 Travellers are an integral part of the diverse community within the Borough, and their particular housing needs must be addressed. To proactively plan for and address these needs, a separate Traveller Local Plan is currently being prepared. This plan is informed by the Gypsy and Traveller's Accommodation Assessment (GTAA) 2020, which identifies a cultural need of 23 pitches (of which 21 align with the PPTS's<sup>47</sup> requirement of 21 pitches) over the plan period. The Traveller Local Plan Issues and Options consultation was consulted on between September – November 2023. Responses are currently being considered and the Traveller Local Plan will be updated accordingly. The next anticipated round of consultation is due to start in Spring 2024, which will explore the potential allocation of sites to meet the identified need and justify the preferred options going forward.

- 8.77 While the Traveller Local Plan is in preparation, it is crucial to provide policy guidelines to consider planning applications that may be submitted before the Traveller Local Plan is adopted. In line with best practices outlined in the PPTS, locally specific criteria should be used to guide both the allocation of sites in plans and formulating policies to assess planning applications which come forward on unallocated sites.

<sup>47</sup> Planning Policy for Traveller Sites - <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites>

# 9 Economy

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# INTRODUCTION

- 9.1 The Borough needs to plan for the creation of more job opportunities to meet the needs of our growing population. This plan sets out a strategy to make the most of the potential of urban sites, which includes mixed use and intensification, before exploring the limited and selective development of Green Belt sites. The ELP's evidence strongly suggests that we need to provide for more, rather than less, employment floorspace.
- 9.2 Ensuring that employment land and premises are appropriately protected while also providing new spaces to meet the evolving needs of businesses is key to maximising Enfield's economic potential. Enfield has a relatively buoyant supply of industrial land and floorspace, which is in high demand. This demand is intensified due to growing competition from other land uses, in particular residential development. Notable employment clusters are situated along major transport routes like the Upper Lee Valley corridor and the Great Cambridge Road (A10). It is imperative to protect these sites to meet needs and support Enfield's pivotal role as a strategically important economic hub.
- 9.3 The presence of Strategic Industrial Locations (SIL) in the Lee Valley and Southbury is testament to Enfield's strategically important role in London's business supply chains. Enfield accommodates the second largest stock of industrial space in London and its location in the UK Innovation Corridor positions the Borough well for capitalising on growth in a range of sectors extending from London to Cambridge.
- 9.4 Protecting and managing these sites is important, as they provide a range of local employment opportunities for Enfield residents, situated in close proximity to their homes. Moreover, with other Boroughs also facing space constraints, local firms are increasingly competing with new firms for the remaining available properties.
- 9.5 More strategically, the Borough's sites play a vital role in ensuring the efficient operation of London as a whole. Enfield's strategic location, offering access to the M25, North Circular Road and A10, makes it highly attractive to businesses seeking to service a large part of London. Therefore, the choices Enfield makes regarding its stock of sites have greater impacts that extend beyond the boundaries of the Borough.

- 9.6 Enfield's office spaces primarily cater to local markets, although businesses like Metaswitch in Enfield Town have a more extensive reach. Protecting employment spaces and providing for an uplift in floorspace is crucial in supporting economic opportunities and addressing spatial disparities. These policies set out an approach to planning for employment that builds on Enfield's key strengths and capitalises on the Borough's prospective growth. They aim to expand Enfield's position as the 'workshop of London', as outlined in the ELP's vision.

Launch of Silverpoint, Angel Edmonton





9.7 Engagement regarding the vision for the ELP has revealed support for meeting some or all of the Borough's employment need. This means that, at the very least, the Borough must plan for an uplift of employment floorspace over the plan period. Respondents support the idea of building a broad-based economy which focuses new growth sectors as well as traditional strengths, and protects small scale workplaces situated close to where people live.

9.8 This plan supports the realisation of Enfield's Economic Development Strategy's objective of expanding the business base. This encompasses growth in sectors like film and television, and low carbon industries, as well as longstanding strengths in manufacturing and logistics activities.

9.9 The policies set out in this chapter strive to provide an uplift in the supply of employment space whilst realising wider spatial objectives. Nevertheless, Enfield faces choices regarding the extent to which it wishes to accommodate employment growth and where such growth should be accommodated.

## NEED FOR LAND AND FLOORSPACE IN ENFIELD

### Industrial and logistics

9.10 London Plan Policy E4 requires the Borough to provide sufficient supply of land and premises to meet current and future demands for industrial and related functions. This considers strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution.

9.11 In line with the London Plan, the Council has assessed the Borough's need for industrial land and floorspace, drawing insights from the Employment Land Review (ELR) prepared in 2023. This review has identified a minimum need of an additional net 304,000 sq. m of floorspace for industrial and logistics uses.

9.12 Reflecting the general principle that the Borough needs to make the best and most efficient use of Enfield's industrial land significant work has been undertaken to understand the scope to intensify existing employment sites.

9.13 The evidence demonstrates that there is scope for significant industrial intensification in Enfield, although the viability and deliverability of such intensification remains an issue for

some purposes. In certain parts of the Borough, fragmented land ownerships can hinder intensification, especially for the most intensive formats, including multi deck warehousing, which often need a large footprint.

9.14 The policies in this plan are fully supportive of appropriate industrial intensification, and the Council will work with landowners interested in assembling sites for industrial intensification.

9.15 It is worth noting that this policy approach alone may not be sufficient to meet all the needs within the urban area. This is particularly relevant to the freight and logistics sector, which has been a major growth sector and recognised in national policies, including the Government's Future for Freight strategy. This strategy emphasises (in paragraph 5.4) the need for 'sites that support freight activities like ports, lorry parks, refuelling stations and infrastructure, as well as distribution centres. These sites often require large amounts of land and should be strategically situated near transportation links, functioning across local authority boundaries and using both the local and national transport networks to move goods.'

9.16 For this reason, the plan recognises the case for exceptional circumstances for Green Belt release at or near key M25 motorway junctions, primarily for the logistics sector and key supporting infrastructure. The release of these sites is contingent upon significant infrastructure improvements.

### Offices

9.17 Enfield is not a significant office location and London Plan Policy E1 does not direct strategic scale growth in office floorspace to the Borough. As per the 2023 ELR, the review recommends the plan provides for an uplift in the provision of office floorspace of 40,000 sq m. The ELR recommended that this should be addressed in the Borough's town centres including through mixed use development.

9.18 The Government has amended the use class order (UCO) and continues to encourage the conversion of office space to residential uses. These UCO adjustments do not change the evaluation of need. There is still a 'need' for new office space, regardless of its use class. However, wider changes to the market and national policies will continue to complicate the Borough's ability to positively plan for office space. This includes the continuation of permitted development rights that enable the conversion of smaller office units into other uses, primarily residential).

9.19 The policies in the ELP addresses the Borough's need, assessed to be 40,000 sq. m, for new office space by encouraging new provision, including through mixed-use development, using a sequential approach to encourage additional provisions in the town centres.



Metaswitch offices, Enfield Town

## STRATEGIC POLICY

# E1: EMPLOYMENT AND GROWTH

1. To ensure the provision of additional employment floorspace (as set out in SS1[3]) to support business growth up to 2041, the Council will work with landowners to deliver:
  - a. intensified development of industrial, logistics and related functions in existing employment areas;
  - b. the provision of new sites for industry and logistics and related functions (including mixed use developments) in urban areas accessible to the strategic road network alongside new locations for industrial and logistics development in appropriate parts of the Green Belt; and
  - c. an uplift in office floorspace in Enfield's designated centres (see **Table 10.1**).
2. Sites set out in **Table 9.1** are allocated for employment-led development and defined on the Policies Map. Further information on site allocations is presented on the site proformas in Appendix C. The proformas carry the status of policy and indicate key requirements and considerations that need to be taken into account as sites come forward for development.

**Table 9.1:** Sites allocated for employment related uses

SITE ALLOCATION REF	SITE ADDRESS	ESTIMATED ADDITIONAL CAPACITY (SQ.M)
<b>Southbury (PL2)</b>		
SA2.2	Heritage House	22,060
SA2.7	Crown Road Lorry Park	4,495
SA2.8	Martinbridge Industrial Estate	25,000
<b>Angel Edmonton (PL4)</b>		
SA4.3	Langhedge Lane Industrial Estate	4,000
<b>Meridian Water (PL5)</b>		
SA5.6	Meridian East (Harbet Road)	20,080
SA5.7	Ravenside Retail Park	32,500
SA5.8	Kenninghall Industrial Area (Metals and Waste)	0
<b>Other sites outside of the place making areas</b>		
URB.28	Land and Buildings South East of Stockingswater Lane	25,375
URB.29	Land to the south of Millmarsh Lane, Brimsdown Industrial Estate	13,500
URB.30	Montagu Industrial Estate	17,902
URB.31	Snowbird foods extension	3,289

SITE ALLOCATION REF	SITE ADDRESS	ESTIMATED ADDITIONAL CAPACITY (SQ.M)
URB.32	Claverings Industrial Estate	3,219
URB.33	6 Morson Road	2,600
URB.34	5 Picketts Lock Lane	0
URB.35	Riverwalk Business Park	924
URB.36	Riverwalk Business Park	924
RUR.03	Land West of Rammey Marsh	70,200
RUR.04	Land East of Junction 24	30,550
RUR.05	Land to the North West of Innova Park	16,445

## EXPLANATION

9.20 Enfield has identified a net additional need for both industrial/ logistics and office space over the plan period. This means the Borough needs to provide for more rather than less employment floorspace going forward. This presents the challenge of how best to accommodate this anticipated growth.

9.21 An assessment of potential development sites has demonstrated that the Borough could meet the needs for industrial and logistics space within the urban area if intensification potential is optimised. The total urban supply is anticipated to be 305,315 sq. m. over the plan period<sup>49</sup>. However, the vast majority of this supply (approximately 197,460 sq. m) comes from anticipated intensification. However, by confining industrial and logistics development to the urban area, Enfield would risk both under-delivery if sites are not intensified as anticipated, and a lack of delivery in the early years of the plan, when prospects for the realistic delivery of intensified formats are less certain.

9.22 Duty to Cooperate (DtC) discussions with local authorities within Enfield's Functional Economic Market Area (FEMA) have revealed, unsurprisingly, that many of them face the same challenges to Enfield and are unable to provide industrial capacity on the Borough's behalf.

9.23 Developing selected Green Belt sites in addition to urban sites offers a more reliable means of supporting delivery, especially within the early years of the plan period. Two specific sites, namely: RUR.03: Land West of Rammey Marsh and RUR.04: Land East of Junction 24 of the M25 – have the most potential for delivering an uplift in floorspace.



Storage Sheds in Enfield

<sup>49</sup> This figure excludes supply anticipated to come forward as part of mixed-use schemes.



## STRATEGIC POLICY

# E2: PROMOTING JOBS AND INCLUSIVE BUSINESS GROWTH

1. The Council will support a growing and diversifying economy, enabling development in our industrial heartlands and thriving town centres. Sustainable economic growth is key to addressing the climate emergency and tackling deprivation. Planning policies will be used to realise the opportunities set out in the Economic Development Strategy and enable good growth throughout the Borough.
  - b. diversification of town centre activities, including making space for knowledge intensive and creative industries;
  - c. intensification of employment generating activities in SILs and LSIS;
  - d. improved skills and training opportunities; and
  - e. encouraging a broad-based economy which serves the needs of residents and businesses, including through supporting growth in health, education and other 'foundational economy' sectors.
2. Proposals which support, protect and enhance the role and function of the Borough's employment locations (as defined on the Policies Map) and maximises the provision of employment floorspace (through the intensification of existing sites/floorspace) will be supported in line with the framework set out in Table 9.2.
3. Proposals will be supported which provide opportunities to maximise and deliver investment and job creation in the Borough through the following measures:
  - a. property development and investment to enable economic development in employment areas, major and district centres and Meridian Water, including developing the UK Innovation Corridor;
  4. Proposals will be supported which provide opportunities to promote the creation of a growing and diverse economy through ensuring availability of a range of workspaces and unit sizes, start-up space, co-working space and 'grow-on' space and protecting existing floorspace and encouraging the provision of new floorspace.

**Table 9.2:** Employment locations

DESIGNATION	ROLE AND FUNCTION	LOCATION
Strategic Industrial Locations (SIL)	Strategically important industrial locations critical to the effective functioning of London's economy. These will be safeguarded in accordance with London Plan policies and intensification will be encouraged.	As set out on the Policies Map.
Locally Significant Industrial Sites (LSIS)	Locally important industrial locations, complementing SILs in meeting local business needs. These sites can deliver a broader range of activities than SILs, but the business function of these sites will be safeguarded and intensification will be encouraged.	As set out on the Policies Map.
Enfield's town centres	The most accessible and sustainable locations for jobs, town centres have the potential to accommodate diverse employment activities. These are areas where we will look to encourage new office uses and make the most efficient re-use of surplus retail space.	Defined on the Policies Map
Other employment sites	These are employment sites or units outside of the areas described above. Taken together they provide significant floorspace and accommodate a range of jobs across a variety of sectors. Many of our mixed used site allocations will provide new employment opportunities.	Throughout the Borough
Co-working and remote working	Ranging from serviced co-working spaces in established employment areas to more local co-working hubs servicing local communities, and infrastructure to support home working.	Throughout the Borough

## EXPLANATION

9.24 This policy sets out the Borough's approach to enabling a growing and diversified economy. It involves designating employment locations and creating favourable conditions for investment and job creation, contributing to the delivery of 137,000<sup>50</sup> jobs by 2041 and secure a more diverse employment base.

9.25 Enfield's large supply of industrial and logistics sites allows it to meet the needs of a wide range of successful and growing sectors. Many industrial and logistics firms are willing to pay a market premium to locate themselves in the borough due to its strategic location. However, providing cost efficient space is important for fostering innovation and entrepreneurship within Enfield. Overall, the combination of available sites and properties in Enfield positions it as an outstanding business and investment proposition.

9.26 **Part 1** of this policy supports economic diversity in Enfield, highlighting the significant role that industrial areas and town centres will play in achieving sustainable economic growth.

9.27 **Part 2** designates and protects Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) to support the long-term growth

of industrial businesses and related services in the Borough. Town centres can offer smaller spaces that cater to the needs of a range of businesses.

9.28 **Part 3** sets out the means for supporting a diverse and thriving economy, involving key partnerships at both the local and strategic level, diversifying town centres to meet the changing needs of the Borough's growing population, optimising the performance and maximising the benefits of agglomeration in the Borough's industrial areas through intensification, and planning for and valuing the foundational economy sectors (such as health, social care and education) that are crucial to the everyday needs of both existing and future residents<sup>51</sup>.

9.29 **Part 4** describes how development should contribute to meeting the Borough's long-term objectives of supporting investment and job creation by delivering space to meet the needs of a range of businesses, thereby enhancing economic resilience.

9.30 For the purposes of this plan, employment uses are defined as office, research and development, light industrial, general industrial and storage and distribution uses (comprising those uses falling within classes E(g),

B2 and B8 of the Use Classes Order), as well as related sui generis uses, such as secondary materials, waste management and aggregates, utilities infrastructure, and wholesale markets, as detailed in London Plan Policy E4 part a.

<sup>50</sup> GLA Economics 'London Long Term Labour Market Projections'

<sup>51</sup> The English planning system frames employment as 'B-class' uses. It is, however, recognised that much foundational economy activity takes place outside this space. Sectors such as education and health are supported by other policies in this plan (such as SC2: Protecting and enhancing social and community infrastructure).



Brimsdown Area

## STRATEGIC POLICY

### E3: STRATEGIC INDUSTRIAL LOCATIONS

1. The Council will safeguard the Borough's Strategic Industrial Locations (SIL) as identified in the London Plan and on the Policies Map to meet strategic economic needs and accommodate increases in employment floorspace.
2. SIL is reconfigured across the remaining parts of the Meridian Water area (Meridian Hinterlands) to broadly maintain the quantum of SIL designated land through 'land swaps' (in line with London Plan paragraph 6.7.3). See placemaking policy PL5.
3. General and light industrial, storage and distribution, research and development and related sui generis uses (such as wholesale markets, waste management, utilities infrastructure) are encouraged in SIL, alongside ancillary office use and land for sustainable transport functions. Small scale food and drink and leisure uses which meet the day-to-day needs of workers and do not adversely affect the industrial status or operation of the area will be supported. Other uses will not be supported.
4. Proposals which result in a net loss of light and general industrial, storage and distribution, research and development and related sui generis floorspace in SILs will be refused.
5. Proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial type activities and their ability to operate on a 24-hour basis.
6. Proposals within designated SIL are supported where they meet the above criteria. Where sites are redeveloped scope for intensified industrial floorspace should be prioritised over other forms of development.



Makers at Bloqs



## EXPLANATION

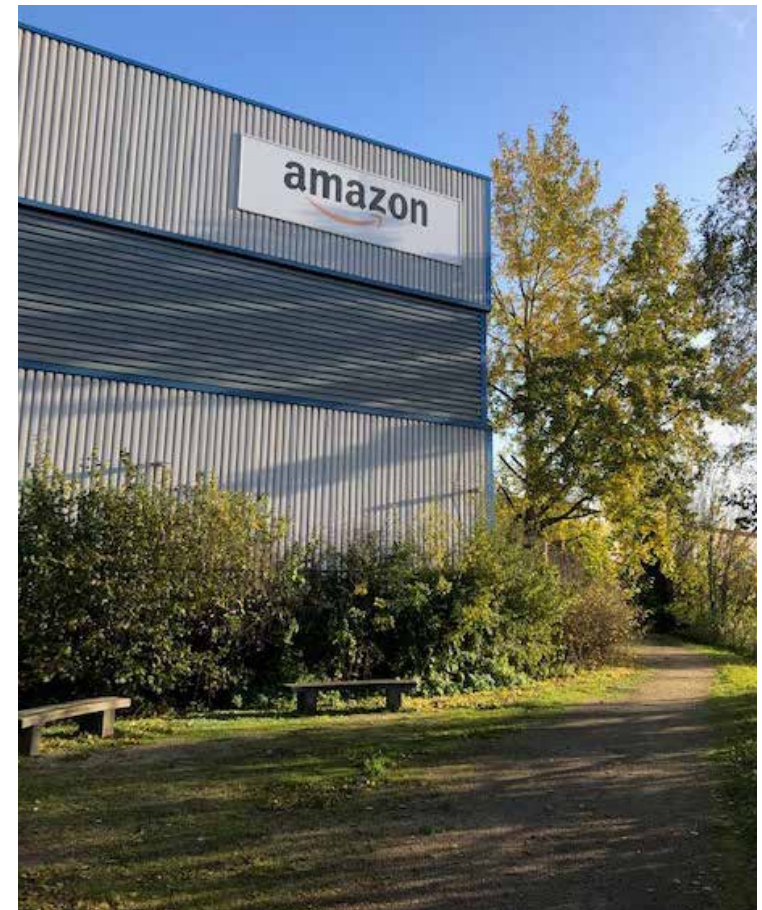
9.31 This policy seeks to protect and increase the capacity of Strategic Industrial Locations (SILs). These sites benefit from good access to the road network and enjoy good links to local and regional supply chains, as well as access to an appropriately skilled workforce. They are of regional importance and accommodate activities essential to the functioning of London's economy. The policy also seeks to safeguard Locally Significant Industrial Sites (LSISs) and non-designated industrial sites, which serve Borough-wide and local needs. These sites contribute to local supply chains and provide employment opportunities close to where people live.

9.32 The policy promotes and protects SILs for industrial-type activities. This includes related sui generis uses such as waste management facilities, utilities and transport depots, along with additional support facilities like office uses, provided they are ancillary in scale and function. It is crucial that these uses are compatible with the industrial function of SILs and do not compromise the ability of businesses to carry out intensive, round-the-clock industrial activities within SILs.

9.33 For the avoidance of doubt, it should be noted that banqueting suites are not permitted in SILs or LSIS. Instead, they will be directed to areas with good access to public transport, as set out in other policies in the Plan.



Greggs Bakery in Enfield



Amazon logistics facility in Enfield



## STRATEGIC POLICY

# E4: SUPPORTING OFFICES

1. Proposals for new office floorspace will be supported in town centre locations, including at Meridian Water.
2. Proposals which result in the net loss of office floorspace in designated centres will be resisted unless there is no current or future market demand for the site as evidenced through a period of at least 24 months of active marketing for office employment uses at realistic market rates. Applicants should seek to maximise the re-provision of office floorspace as part of any redevelopment scheme.

### EXPLANATION

9.34 The Employment Land Review (ELR 2023) indicates we need to plan for around 40,000 square metres of net additional floorspace by 2041<sup>52</sup>. This policy seeks to support the delivery of new office floorspace while preventing any reductions. The ELR (2023) found a very low level of available stock supporting the need for floorspace. Part 1 of the policy encourages the provision of new office floorspace in town centres including Meridian Water, which are well connected locations where office growth can be accommodated sustainably, and where office workers can provide the footfall needed to help these places to thrive.

9.35 In line with the London Plan, Enfield Town and Southgate are locations where small office capacity is to be protected. Given the Borough's identified need for office floorspace, the Council will apply a protectionist stance across the Borough. Part 2 of this policy, in line with the London Plan requires robust marketing efforts to justify the release of existing office stock. This evaluation should emphasise the Borough's strengths as an affordable office location and reflect the value that secondary stock has in the Borough.

9.36 At the time of drafting, Permitted Development rights allow the loss of some office space into housing without the need for planning consent. In cases where planning permission is required, and proposals meet the requirements set out in Part 2 of the policy, applicants should demonstrate that they have maximised the opportunity to provide replacement office floorspace on site, including through the provision of small units suitable for small and medium enterprises (SMEs).

<sup>52</sup> <https://new.enfield.gov.uk/services/planning/enfield-employment-land-review-report-aecom-planning.pdf>

## STRATEGIC POLICY

# E5: TRANSFORMING INDUSTRIAL SITES

1. The intensification of industrial uses within SILs and LSIS through the more efficient use of space, higher plot ratios, the development of multi-storey schemes, and the assembling of sites within designated employment areas to assist with the delivery of more intensive formats will be supported.
2. Proposals involving the intensification of industrial uses within SILs and LSISs will be supported where proposals:
  - a. as a minimum result in a net increase in employment floorspace and seek to maximise industrial development potential;
  - b. are phased to secure the completion and operation of the employment components of the scheme before first occupation of any non-employment uses;
  - c. are conceived with proactive engagement with the local planning authority and Greater London Authority;
  - d. are informed by engagement with existing businesses to seek to retain them on site where possible, implement effective transitional arrangements, and provide support for any businesses that cannot be incorporated to relocate off site; and
  - e. involve effective mitigation of potential negative impacts on surrounding areas (including increased noise and traffic resulting from intensified development), especially to nearby residential occupiers. Proposals should utilise high quality and innovative design approaches to create a buffer and separation between any heavy or intensive uses (especially B2 or B8) and nearby sensitive uses. The Agent of Change principle applies.
3. Proposals within SILs and LSIS should provide environmental improvements, including walking and cycling links and improved amenities for workers, and take opportunities to incorporate urban greening and SuDS, and integrate with and enhance blue and green networks.

## EXPLANATION

- 9.37 The Borough's stock of sites for Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSISs) is one of Enfield's most important assets. Enfield plays a major role in securing industrial intensification and successfully implementing policy E7 of the London Plan. Maintaining these policy designations is essential to supporting the delivery of floorspace through industrial intensification.
- 9.38 Development proposals which seek to intensify industrial and logistics activities within SILs and LSISs will be supported in principle. AECOM and Stantec's studies on industrial intensification for the Council have identified several sites with significant potential to provide intensified space, reducing the reliance on new land to meet economic needs<sup>53</sup>.
- 9.39 The evidence base for the ELP highlights that larger sites offer the most scope for accommodating intensive formats, and the Council encourages developers to work with us to formulate schemes which can deliver substantial increases in floorspace while aligning with wider spatial planning objectives.

<sup>53</sup> <https://new.enfield.gov.uk/services/planning/evidence-base/>

9.40 All proposals for intensification should actively explore options for vertical extension and maximise the employment development potential of the sites. These proposals must align with the London Plan and associated guidance, such as the Mayor of London's Industrial intensification and co-location through plan-led and masterplan approaches practice note<sup>54</sup>. The Mayor of London's Intensification Primer can helpfully signpost promoters to the types of intensified formats that the Council, in applying London Plan Policy E7, would expect promoters to explore<sup>55</sup>.

9.41 The ELP's evidence can provide valuable insights for those seeking the most effective ways to intensify space. The evidence base sets out the type of intensified formats that may be most suitable in the Enfield context, as well as where intensification is most viable and deliverable. However, this approach should not stifle innovation and the encouragement of new formats which meet the Borough's business needs is encouraged.

9.42 Proposals aimed at improving environmental quality and making SILs and LSISs more attractive and competitive to businesses are strongly supported. In particular, these proposals should take opportunities to introduce environmental enhancements to the industrial areas, aligning with the plan's vision to 'green the industrial valley'. More broadly, there is scope for better placemaking and improved walking and cycling links, to create thriving business hubs. Proposals should explore ways to improve connections to blue and green networks and incorporate biophilic design principles, such as planting, trees and green roofs, to integrate employment areas into wider networks. Furthermore, redevelopment proposals should consider providing improved amenities for workers, including places for employees to eat and drink and nursery/creche facilities.



industrial intensification scheme in Greenwich. Image by Fred Howarth

<sup>54</sup> [https://www.london.gov.uk/sites/default/files/practice\\_note\\_-\\_industrial\\_intensification.pdf](https://www.london.gov.uk/sites/default/files/practice_note_-_industrial_intensification.pdf)

<sup>55</sup> <https://www.london.gov.uk/sites/default/files/industrialintensificationprimer>

Economy

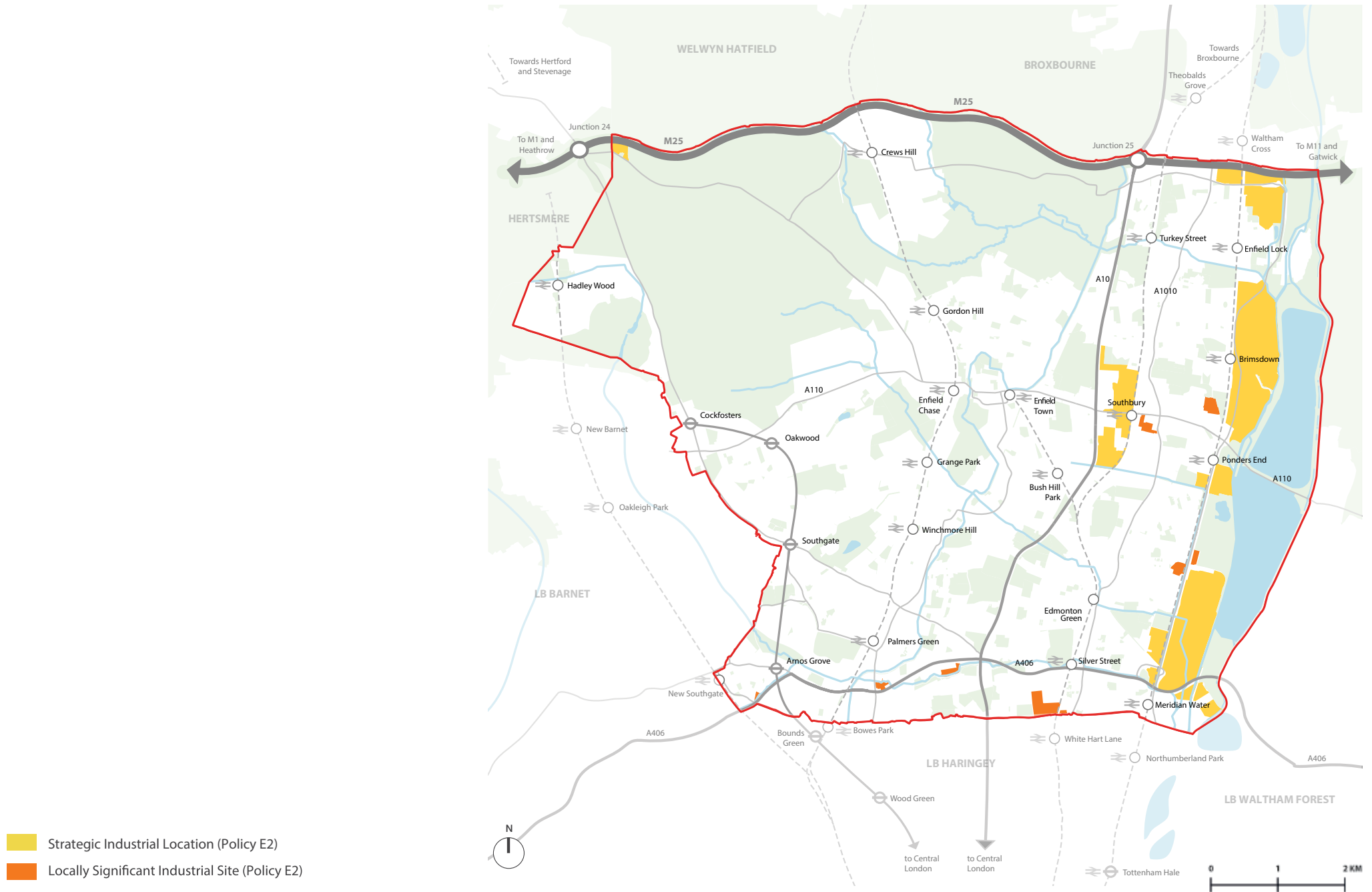


Figure 9.1: Employment designations



## STRATEGIC POLICY

### E6: LOCALLY SIGNIFICANT INDUSTRIAL SITES

1. Locally Significant Industrial Locations (LSIS), as shown on the policies map, are safeguarded to meet local business needs.
2. General and light industrial, storage and distribution, research and development and related sui generis uses are encouraged in LSIS. Proposals for non-industrial type uses in LSIS must not compromise the business function of the site and must have regard to the agent of change principle.
3. Proposals which result in a net loss of light and general industrial, storage and distribution, research and development and related sui generis floorspace in LSISs will be refused.
4. Proposals within areas of LSIS are supported where they meet the above criteria. Where sites are redeveloped scope for intensified industrial floorspace should be prioritised over other forms of development.

#### EXPLANATION

- 9.43 This policy promotes and protects Locally Significant Industrial Sites (LSIS) as suitable employment locations for industrial-type activities. While LSIS primarily support industrial-type uses, this policy allows a broader range of uses, including non-ancillary office and residential uses, subject to compliance with other policies in this Plan. Proposals for uses other than light and general industrial, research and development and storage and distribution in LSISs must ensure that they do not compromise existing industrial-type activities within the LSIS, in line with the Agent of Change approach.
- 9.44 For mixed use redevelopment schemes in LSIS, it is imperative that the scheme's implementation is carefully phased to ensure the completion and operation of the employment-related components of the scheme before first occupation of non-employment uses.



LSIS in Enfield

## DEVELOPMENT MANAGEMENT POLICY

### E7: NON-DESIGNATED INDUSTRIAL SITES

1. Within non-designated industrial sites, general and light industrial, storage and distribution, research and development and related sui generis uses will be protected. Any proposals involving the net loss of such floorspace should meet the requirements set out in policy E5 part B.
2. Proposals that result in a loss of industrial type floorspace should be accompanied with evidence that demonstrates:
  - a. there is no current or future market demand for the site as evidenced through a period of at least 24 months of active marketing for industrial employment uses at realistic market rates;
  - b. there is a strategy in place to deal with the relocation requirements of existing businesses that cannot be incorporated within the redevelopment and all reasonable efforts have been made to secure a suitable alternative site(s), including transitional arrangements;
  - c. redevelopment will not compromise the function, access, servicing or operation of any remaining or neighbouring employment uses; and
  - d. in town centre locations, efforts have been made to accommodate employment floorspace as part of any redevelopment scheme. Applicants should seek to maximise the provision of replacement employment space where it is viable and practical to do so.

#### EXPLANATION

- 9.45 Non-designated sites accommodate a network of firms including those like garages and motor repair services, which are highly regarded by local residents for their proximity to their communities. However, not all non-designated industrial sites are ideally located and many are in need for renewal. There may be cases where, through a robust development management process, a compelling case can be made to release sites for other uses.
- 9.46 Considering the ongoing demand for industrial sites, we will continue to protect industrial space as an integral part of the vibrant mix of activities in the town centres. However, recognising the Borough's need for office floorspace, redevelopment or conversion of industrial space to office uses in town centres will also be supported, where proposals meet the requirements of Part 2 of the policy.

## DEVELOPMENT MANAGEMENT POLICY

### E8: PROVIDING FOR WORKSPACES

1. Proposals involving new workspace will be supported where they provide:
  - a. a range of unit sizes, including co-working, incubator and accelerator space; and
  - b. spaces that are flexible, suitable for subdivision and a range of configurations.
2. The provision of affordable workspace will be supported, having regard to:
  - a. the viability of the development (taking account of prevailing market conditions);
  - b. the nature of the occupants; and
  - c. the quality and size of the proposed units.
3. Proposals that result in the net loss of affordable workspaces will be resisted.
4. The provision of co-working spaces will be supported in Enfield's centres. Larger residential schemes should consider the provision of shared workspaces to meet resident's needs. Residential units should be designed to support home working.

#### EXPLANATION

- 9.47 Workspaces, for the purpose of this policy, refer to places of work, i.e. premises occupied for commercial purposes. Workspaces typically accommodate various functions, including offices, research and development, light industrial, general industrial, and storage and distribution.
- 9.48 Given the importance of microbusinesses to Enfield's economy, Part 1 of this policy supports the provision of a range of workspaces to meet the needs of entrepreneurs and small and growing businesses. London Plan Policy E3 encourages the use of affordable workspace policies to secure a supply of space which is maintained below the market rate for that space for a specific social, cultural, or economic development purpose.
- 9.49 Building on the findings of the 2023 Employment Land Review, developments proposing more than 1,000 square metres in net additional employment floorspace should assess whether 10% of the proposed net additional floorspace could viably be delivered as affordable workspace (i.e. available at a minimum 10% below market rates). If the viability assessment

suggests this quantum of affordable workspace can be sustained, the applicant will be required to provide this amount of affordable workspace in perpetuity, either on-site or elsewhere within the London Borough of Enfield.

- 9.50 Where affordable workspace is part of the proposal, the applicant must submit an affordable workspace statement setting out how it will be delivered, including evidence of engagement with affordable workspace providers and address each of the criteria set out in part 2 of this policy. Consideration should be given to prioritising affordable space for the priority sectors set out in the forthcoming Enfield Inclusive Economy Strategy (or any updated successor).

- 9.51 To support future economic resilience, part 4 of the policy supports co-working and remote working. Larger co-working spaces can form part of a mix of uses in town centres, contributing to increased footfall and vitality which supports the diversity of these centres. There is also scope for smaller co-working hubs serving local neighbourhoods and larger residential developments. The potential for home and remote working should be considered in the design of homes, including considerations for access to digital infrastructure.

## DEVELOPMENT MANAGEMENT POLICY

# E9: LOCAL JOBS, SKILLS AND LOCAL PROCUREMENT

1. Proposals comprising ten or more residential units or on sites of 0.5 hectares in size will be required to secure local employment at both the construction and end-use phases and provide appropriate work-based training/apprenticeships through section 106 obligations where appropriate. In such circumstances, applicants will be required to submit a site-specific employment and skills plan alongside the planning application setting out how they will engage with local contractors/subcontractors, how many trainees will be employed on site and how many weeks training will be provided per trainee.
2. Proposals that result in a net loss of employment (land, floorspace, uses or jobs) where there is a justification to approve the scheme will be required to enter into a section 106 agreement. In such cases, developers will be expected to:
  - a. relocate the existing businesses to suitable premises in the locality; or
  - b. provide the equivalent number of jobs elsewhere within the Borough; or
  - c. make a financial contribution towards industrial land regeneration projects, employment training schemes, job brokerage services or business support initiatives (which will be calculated on the basis of the formula set out in Appendix D).

### EXPLANATION

- 9.52 This policy seeks to ensure that new development in the Borough make a positive contribution towards employment and training initiatives. These initiatives are designed to help support those sections of the local workforce, particularly young people and those who have been unemployed for an extended period who are struggling to access jobs arising from the lack of skills, lack of qualifications or limited work experience.
- 9.53 For the purposes of this policy, employment and training initiatives include various activities such as:
- offering work experience placements;
  - supporting apprenticeships;
  - providing direct employment opportunities;
  - offering training in employment-related skills;
  - facilitating job brokerage;
  - engaging with local supply chains;
  - providing assistance to small and medium enterprises; and
  - implementing measures to mitigate the loss of employment, including the regeneration of industrial land.



- 9.54 Section 106 agreements and planning conditions will be used, as appropriate to secure contributions from developers that support local training and employment initiatives in the Borough. The specific nature and extent of these contributions will be determined during the pre-application stage and prior to the determination of the planning application.
- 9.55 The employment and skills plan must explain how the developer intends to achieve the following:
- ensure at least 25% of the workforce comprises local labour both during the construction or demolition phase and for the initial two years following end-use occupation of the development;
  - employ at least one apprentice or trainee for every £3 million of contract value. If this is not feasible, financial contributions will be required in lieu of direct provision to support other training and employment initiatives; and
  - procure at least 10% of the total value of goods, services and supplies from local businesses.
- 9.56 Additional work placement or apprenticeship opportunities may arise during the decoration of newly-constructed developments and the fitting of appliances etc. Further, back-office functions like business administration could offer further work placements and training opportunities.
- 9.57 Developments that meet the threshold criteria in part 1 of this policy will be required to prepare a site-specific employment and skills plan alongside the submission of a planning application. This plan will outline the site-specific measures that will be used to facilitate training and employment opportunities arising from the proposed development, subject to prior agreement before commencing construction works. Adherence with an agreed employment and skills plan may be secured through conditions, or alternatively, the submission and approval of such a plan may be dealt with through a Section 106 agreement.
- 9.58 Employment and skills plans are instrumental in raising the skill levels of the workforce in the Borough, thereby increasing their employability in the labour market. It is equally important to build on the economic strengths of the Borough and ensure that local residents have the right skills and training to access both existing and emerging growth sectors, particularly advanced manufacturing, sustainable construction and digital businesses.
- 9.59 For the purposes of this policy, local labour refers to workers who live within the Borough. Maximising local labour will help reduce the need to travel and reduce the risk of unnecessary or unforeseen delays. During the demolition and construction phases of the development, developers will be expected to make best efforts to employ local contractors, subcontractors and local trainees. They should also create apprenticeship placements which are available to local residents as well as employ local businesses in the supply chain or in its end use, including the provision of materials, goods and services.
- 9.60 Moreover, developments should also ensure that, as far as is practicable, the workforce employed on site reflect the diversity of Enfield's communities. Demographic information about Enfield is accessible through the Council's website and Office for National Statistics (ONS).
- 9.61 All apprenticeships must be safeguarded against the possibility that the development will finish before the apprenticeship period ends. Where possible, developers should seek opportunities to accommodate the apprenticeships in house. If this is not possible, developers should work with a suitable apprenticeship training agency with accreditation from the National Apprenticeship Service to secure the successful completion of the apprenticeship.

- 9.62 Enfield has agreements with neighbouring London boroughs to share apprenticeships, particularly for meeting S106 targets. This cooperation allows developers to place apprentices on sites across different boroughs, ensuring the completion of apprenticeships or higher apprenticeships even beyond the lifetime of the construction phase of a development.
- 9.63 Where it is not possible to provide apprenticeships on the construction site, developers will be required to make a financial contribution to support training, employment and local procurement initiatives (based on the activities defined above). This contribution aims to enhance the prospects for using local employment during the construction or demolition of the development. Apprenticeships are expected to have a minimum duration of at least 12 months, in line with the relevant qualification being obtained. Where this is not possible, a contribution will be sought to help fund our job brokerage service, in-lieu of creating apprenticeships.
- 9.64 In the event where employing a trainee for a full-year is not possible, a fee will be charged for each week in which a trainee placement was not provided on site, equivalent to the current London Living Wage, calculated on the formula set out in Appendix E.
- 9.65 Part 2c of this policy sets out a requirement to either relocate business affected by the loss of employment or jobs resulting from development to suitable premises in the Borough, provide the equivalent number of jobs elsewhere within the Borough or make a financial contribution based on the number of jobs lost. The assessment of loss will be calculated at the point of submission of the planning application (see Appendix E). Where development involves the loss of vacant employment space, employment densities, evidence on vacancy periods and marketing efforts will be used to establish the potential number of jobs lost.
- 9.66 This policy applies to major developments, but opportunities for local employment and training will also be sought within smaller developments where such opportunities arise.
- 9.67 Once construction has started, developers will be required to monitor and report on the progress of the training and employment initiatives set out in the employment and skills plan. This reporting should be in line with the targets set out in the signed Section 106 agreement and include details about relevant workers, total number of workers and details of the relevant apprentices, apprenticeship placements and apprenticeship courses.



Constructional skills training in local area

## DEVELOPMENT MANAGEMENT POLICY

# E10: FOSTERING A SUCCESSFUL EVENING ECONOMY

1. The Council will support development that contributes to the vitality and viability of Enfield's Major and District centres and Meridian Water, and supports a balanced and socially inclusive evening and night-time economy, subject to the following considerations:
  - a. **Cumulative impact** – in areas where a concentration of night-time uses may be detrimental to the character or vitality and viability of the centre, there will be a presumption against the expansion of existing facilities and the development of new facilities.
  - b. **Residential amenity** – the proposed use should not create an unacceptable impact on neighbouring uses in terms of noise, traffic and disturbance taking account of the type and characteristics of other uses, such as housing, shops and public houses; as well as any known unresolved amenity, traffic or safety issues arising from existing uses in the area.
  - c. **Balance** – new uses in centres should support both the day-time and evening and night-time economy whilst not undermining the role and function of town centres.
2. Evening and night-time activities will be supported outside Major and District centres (including in smaller centres and parks) subject to the agent of change principle.



Edmonton Green at night



## EXPLANATION

9.68 The evening economy plays an important role in driving economic development, fostering social interaction, promoting wellbeing and improving safety through increased activity and passive surveillance. Activities within the evening economy include a wide range of arts, cultural and entertainment venues, restaurants and pubs. Nonetheless, these activities can potentially have adverse effects on the health and well-being of local communities, the local environment and the amenity of neighbouring properties. Therefore, all development must include measures to safeguard established neighbouring uses, including mitigatory measures and management protocols, such as licensing.

9.69 Where appropriate, planning conditions will be used to control opening and closing hours of premises, ensuring careful and controlled approach to mitigating the impact of the amenity of the area. This measure will consider factors such as the type of use, hours of operation, means of access, level of car parking demand on surrounding streets and the cumulative impact of neighbouring uses and other factors. Measures to manage noise impacts

should be controlled through various measures, such as the implementation of acoustic limits on extraction and ventilation, the use of acoustic glazing, and the installation of acoustic insulation between floors and properties, where appropriate.

9.70 Depending on the circumstances, a mitigatory management plan may be required through conditions to secure the implementation of measures aimed at satisfactorily addressing community safety, litter collection and wayfinding. In situations where new residential properties are proposed within mixed-use schemes or in close proximity to established or planned late night licenced uses, the proposed use will need to demonstrate its capability to mitigate the impact of such late-night established or planned use so that the amenity of future residents is protected. Proposals should also clearly demonstrate noise attenuation measures have been included and designed to the highest standards.



The White Building in Hackney Wick



## DEVELOPMENT MANAGEMENT POLICY

### E11: CREATING A SMART AND DIGITALLY CONNECTED BOROUGH

1. New development will be expected to provide access to high quality digital connectivity services from a range of providers (especially within areas of deficiency), enable smart tech use, reduce the need to travel and support smart city concepts.
2. Improved connectivity will be encouraged in major and district centres and designated employment locations including: Enfield Town, Southgate, Palmers Green, Angel Edmonton, Edmonton Green, Meridian Water, Strategic Industrial Locations and Locally Significant Industrial Locations to support a thriving and resilient economy.
3. Proposals will be expected to:
  - a. address digital connectivity from the outset and secure the provision of the most up-to-date communications infrastructure (including the fastest available broadband) in line with latest standards, preferably on site;
  - b. incorporate full-fibre connections, including sufficient open-access ducting capacity to accommodate different digital infrastructure providers;
  - c. not interfere with existing digital, communications and aviation infrastructure, unless adequate mitigation can be provided;
  - d. explore opportunities to co-locate or share facilities and digital innovations, especially on large, masterplanned sites; and
  - e. enable easy access for servicing and maintenance (including future upgrading as technology and standards improve).
4. Development involving the provision of telecommunications infrastructure (excluding permitted development) will be expected to:
  - a. demonstrate where new sites are proposed that co-location and/or site sharing on existing structures has been explored;
  - b. not create any unacceptable risks to the health and well-being of residents and users and the amenity of the surrounding area, having regard to the sensitivity of the location and its capacity to accommodate new equipment;
  - c. not result in the International Commission guidelines on non-ionising radiation protection being exceeded; and
  - d. not cause interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.
5. Telecommunications development will not be permitted within the Green Belt and areas designated as Metropolitan Open Land unless it can be demonstrated that there are no other suitable sites available and the proposed use will maintain the openness of the Green Belt or the objectives of Metropolitan Open Land in line with the London Plan.

**EXPLANATION**

- 9.71 Enfield is committed to becoming a leading smart Borough with world-class digital infrastructure, services and connections, including high-speed broadband and storage capabilities. This policy sets out how this digital network will be safeguarded, maintained and expanded serving as a key part of the Borough's wider digital strategy to support its long-term prosperity and growth.
- 9.72 Digital connectivity depends on the availability of fibre and the speeds it can deliver. Enfield has some of the fastest broadband connections in the UK, but the overall situation is varied: broadband speeds tend to be faster in more urban locations, like town centres and suburban residential areas, but slower in remote locations, including parts of the Lee Valley and Green Belt.
- 9.73 This policy aims to secure the implementation of full-fibre broadband connections within both existing and new developments. This includes the installation of appropriate cabling within residential or business units as well as the establishment of fully enabled connections for developed areas to the main telecommunications network. New residential developments should ensure good levels of connectivity to support home working needs.

- 9.74 Some forms of telecommunications infrastructure such as small-scale mobile masts, may be covered by permitted development rights. Where planning permission or prior approval is required, applicants will need to demonstrate that the new equipment will not have a detrimental impact on the amenity and public safety of the surrounding area. All planning applications should consider how they will address the current and future needs of the occupiers taking into account of increasing connectivity demands. Consideration of sensitive and innovative design and integration/ dual use will be required to reduce impact, reduce street and skyline clutter, and prevent the proliferation of infrastructure on or attached to buildings or structures. New equipment like boxes enabling the deployment of the latest wireless networks, should be situated away from listed buildings, scheduled monuments and other important heritage assets, wherever possible.
- 9.75 Developers will need to have special regard to the sensitivity of the Green Belt, Metropolitan Open Land and other locations where the quality of the landscape and townscape may be particularly sensitive to the intrusion of communication infrastructure. This includes conservation areas and listed buildings. Proposals involving new telecommunications equipment

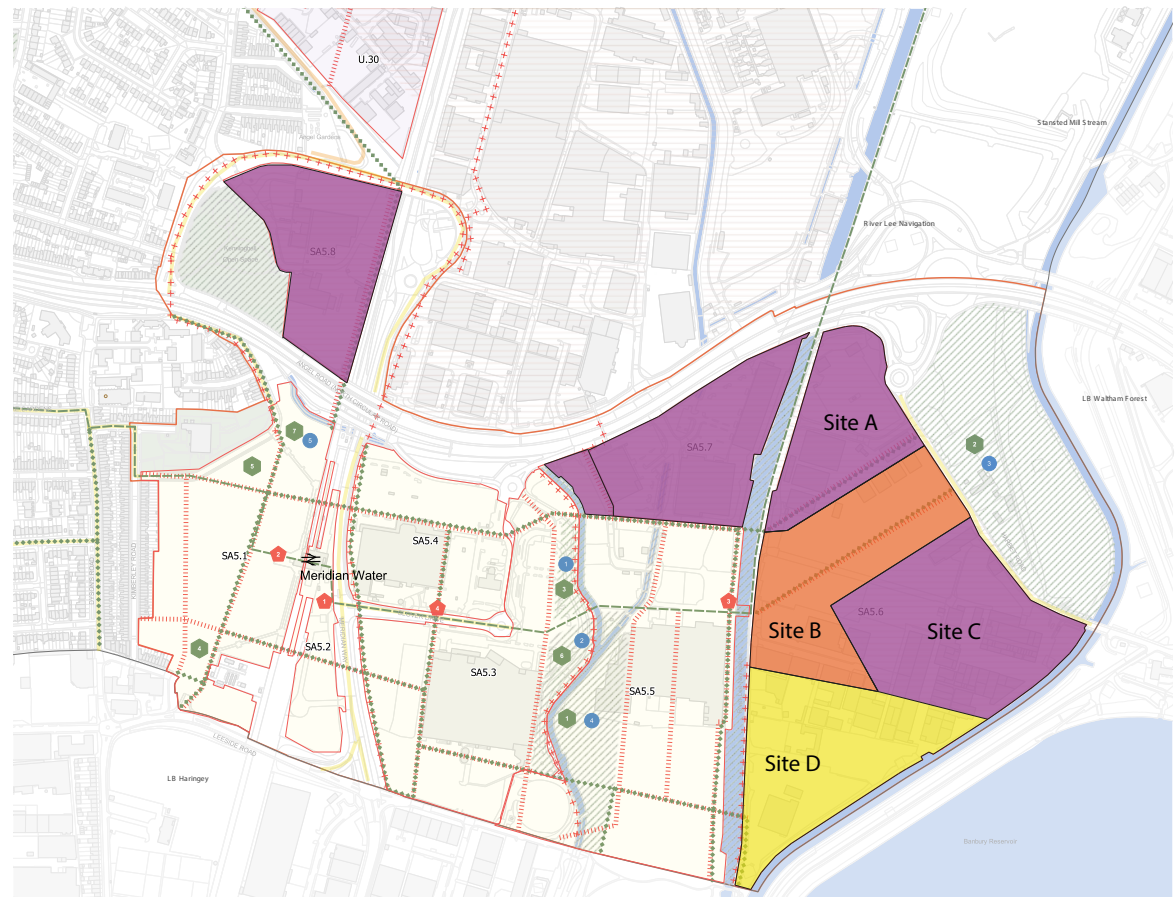
need to demonstrate that exceptional circumstances exist to justify inappropriate development in the Green Belt and Metropolitan Open Land. It will also be important to ensure that new buildings do not prevent residents from accessing strong and uninterrupted television reception.

## MERIDIAN HINTERLANDS

- 9.76 As set out in Policy PL5, the ELP envisages the improvement of economic opportunities within Meridian Water, aiming to accommodate a diverse range of businesses.
- 9.77 Meridian Water's economic offer is divided between the land west of the River Lee Navigation known as Meridian West, and land east referred to as Meridian East:
- Meridian West serves as the heart of the regeneration area and will accommodate a new town centre. This area is suitable for office and other E-class uses, exploiting on its good public transport connectivity and the advantages of a town centre location. Additionally, opportunities for industrial activities are available in the 'northern band' next to the North Circular Road.
  - Meridian East on the other hand, will be the focus of industrial-led regeneration. This area gives priority to industrial and logistics uses, exploiting its excellent links to the strategic road network. Furthermore, this area has the potential to accommodate lighter industrial uses that may be difficult to accommodate within a town centre location.

9.78 The 'Meridian Hinterlands' comprise several strategic sites situated outside Meridian Water town centre. These sites are Kenninghall, Ravenside, and Meridian East, which comprises: Parcel A: Hawley Yard, Parcel B: Park Link Route, Parcel C: Hinterlands East and Parcel D: Hinterland South; see Figure 9.2.

**Figure 9.2: Parcels A, B, C and D**



9.79 Table 9.3 sets out the changes in hectares across key Meridian Hinterland sites as part of the industrial-led regeneration approach.

Table 9.3: Changes across key sites

Parcel	Baseline ha			Short term ha			Long term ha		
	SIL	LSIS	Undesignated	SIL	LSIS	Undesignated	SIL	LSIS	Undesignated
Kenninghall	0	3.4	0	3.4	0	0	3.4	0	0
Ravenside	0	0	3.52	3.52	0	0	3.52	0	0
Meridian 7	0	0	0.44	0.44	0	0	0.44	0	0
Parcel A	3.5	0	0	3.5	0	0	3.5	0	0
Parcel B	4.1	0	0	0	0	4.1	0	0	4.1
Parcel C	4.8	0	0	4.8	0	0	4.8	0	0
Parcel D	5.8	0	0	5.8	0	0	0	5.8	0
Total	18.2	3.4	3.96	21.46	0	4.1	15.66	5.8	4.1



9.80 Table 9.4 below sets out the gains in employment floorspace both in SIL and LSIS, and new homes industrial-led regeneration will bring.

9.81 The ELP seeks to effectively manage the reservoir of Strategic Industrial Location (SIL) in this area, with the goal to deliver an ambitious increase in employment floorspace through intensification and consolidation. This approach will also facilitate the creation of new homes, including as part of the industrial-led new Locally Significant Industrial Sites (LSIS). The strategy set out in this policy involves the intensification of some parcels, reconfiguration of others, the designation of new SIL and the release of some areas from their current SIL designation. The ultimate goal is to optimise the potential for industrial-led regeneration, ensuring the development of intensified industrial activities at key sites before releasing parts of the Meridian Hinterlands from SIL designation to support employment-led mixed use redevelopment.

9.82 Specifically, the plan proposes the designation of 6.92 hectares of new SIL at Kenninghall and Ravenside. It also includes the release of 4.1 hectares at Meridian Water Hinterlands specifically Parcel B: Park Link Route and the future re-classification of SIL into 5.8 hectares as LSIS at Parcel D: Hinterlands South.

9.83 Where new residential development is proposed, the intensified industrial floorspace should be completed in advance of any residential occupation, in line with London Plan policy E7 Part D).

9.84 Kenninghall Holdings Limited, the owners of the Kenninghall site (commonly known as Montagu Industrial Estate South) have indicated their support for the SIL designation of their site. Similarly, Prologis Ltd have promoted Ravenside Retail Park for intensified logistics development and has expressed approval of the proposed SIL designation.

Table 9.4: Gains in employment floorspace in both SIL and LSIS

Parcel	Baseline ha		Short term ha		Long term ha	
	Employment sqm	Residential units	Employment sqm	Residential units	Employment sqm	Residential units
Kenninghall	8,500	0	8,500	0	8,500	0
Ravenside	0	0	32,500	0	32,500	0
Meridian 7	0	0	8,500	0	8,500	0
Parcel A	7,530	0	58,100	0	58,100	0
Parcel B	3,180	0	0	925	0	925
Parcel C	16,358	0	38,838	0	38,838	0
Parcel D	14,440	0	14,440	1,170	29,000	1,170
Total	50,008	0	160,878	925	175,438	2,095

## DEVELOPMENT MANAGEMENT POLICY

# E12: MERIDIAN HINTERLANDS

Meridian Hinterlands will be promoted for employment-led redevelopment as follows:

### 1. Land Quantum and Use

The quantum of land for both Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) will be broadly maintained. In accordance with paragraph 6.7.3 of the London Plan, SIL will be reconfigured through land swaps. This is detailed in Tables 9.3 and 9.4.

SIL Retention:

- Parcel A (Hawley Yard) – 3.5ha;
- Parcel C (Hinterlands East) – 4.8ha.

SIL Removal:

- Parcel B (Park Link Road) – 4.1ha.

LSIS Removal:

- Kenninghall Metals and Waste (Site SA 5.8) – 3.4 ha.

SIL Designations:

- Ravenside Retail Park (Site SA 5.7) – 4ha.;
- Kenninghall Metals and Waste (Site SA

5.8) – 3.4ha; and

- Meridian 7 - 0.44ha.

Aspirational Change from SIL to LSIS:

- Parcel D (Hinterlands South) – 5.8ha.

The overall change in the quantum of land is shown below:

	SIL (hectares)			LSIS (hectares)		
	Baseline	Future	Change	Baseline	Future	Change
Kenninghall	0	3.4	+3.4	3.5	0	-3.5
Ravenside	0	3.52	+3.52	0	0	0
Meridian 7	0	0.44	+0.44	0	0	0
Parcel A	3.5	3.5	0	0	0	0
Parcel B	4.1	0	-4.1	0	0	0
Parcel C	4.8	4.8	0	0	0	0
Parcel D	5.8	0	-5.8	0	5.8	+5.8
<b>Total</b>	<b>18.20</b>	<b>15.66</b>	<b>-2.54</b>	<b>3.50</b>	<b>5.80</b>	<b>+2.30</b>

## 2. Intensification of Floorspace

### a. Strategic Industrial Locations

Intensification of industrial floorspace in SIL will be supported, including proposals which meet the needs of logistics occupiers in line with the London Plan. Heavier industrial uses, including B2 and B8, and those requiring 24-hour operation, will be directed towards SIL.

### b. Redevelopment of Parcel D (Hinterlands South)

Parcel D will be subject to a masterplan that facilitates a future LSIS designation. The Council will seek a significant uplift in locally oriented industrial floorspace. Lighter uses such as flexible spaces, workshops and E-class activities will be supported.

Gains in employment floorspace are set out in Table 9.4. The table below shows the change in SIL and LSIS separately.

	SIL (floorspace, sq.m)			LSIS (floorspace, sq.m)		
	Baseline	Future	Change	Baseline	Future	Change
Kenninghall	0	8,500	+8,500	8,500	0	-8,500
Ravenside	0	32,500	+32,500	0	0	0
Meridian 7	0	8,500	+8,500	0	0	0
Parcel A	7,530	58,100	+50,570	0	0	0
Parcel B	3,180	0	-3,180	0	0	0
Parcel C	16,358	38,838	+22,480	0	0	0
Parcel D	14,440	0	-14,400	0	14,560	+14,560
<b>Total</b>	<b>41,508</b>	<b>146,438</b>	<b>119,370</b>	<b>8,500</b>	<b>14,560</b>	<b>+6,060</b>

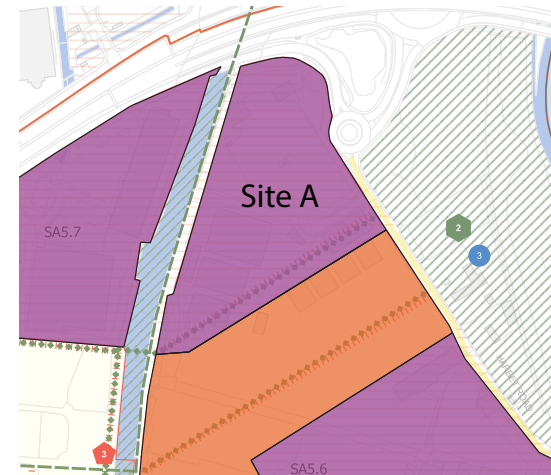
### 3. Redevelopment of de-designated employment land: Parcel B (Park Link Road)

Redevelopment that provides a mix of uses and an access corridor between Meridian Water and Edmonton Marshes (as well as the wider Lee Valley Regional Park) will be supported. This connection is a key element of the overall placemaking strategy for Meridian Water and Enfield as a whole.

## EXPLANATION

- 9.85 Reflecting on the London wide shortage of land for Strategic Industrial Location (SIL) and Enfield's role<sup>56</sup> as a strategic logistics location, SIL land should prioritise those uses which need round-the-clock operations, physical separation of uses or a format of property that are challenging to accommodate in mixed use developments.
- 9.86 In line with London Plan policy E7, development proposals adjacent to SILs should not compromise the integrity or effectiveness of these locations for industrial type activities and their ability to operate on a 24-hour basis. Residential development adjacent to SILs should be designed to ensure that existing or potential industrial activities in SIL are not compromised or curtailed.
- 9.87 Light industrial activities, flexible spaces, workshops and other economic uses that would be acceptable on industrial land should be directed to Locally Significant Industrial Sites (LSIS). These uses should contribute to any necessary 'buffering' to protect the functionality of SIL land.

- 9.88 The plan provides only indicative floorspace estimates for the future LSIS and SIL, as the final quantum and mix will be determined through further masterplan work and planning applications. However, as a general principle, reflecting the current industrial designation of the land, economic uses should be prioritised on LSIS and deliver a new mixed use community that seeks to integrate economic uses where possible. The increase in LSIS floorspace should support the growth of lighter industrial uses, including workshops, maker spaces, last-mile logistics, and film and TV-related uses.
- 9.89 The provision of affordable workspace and affordable housing will be required in line with development plan policies. Proposals involving affordable workspace will be supported in principle at Parcel B: Park Link Route and Parcel D: Hinterlands South, to make best use of limited SIL land and support industrial-led regeneration on non-SIL sites.
- 9.90 Industrial-led regeneration efforts will be supported at Meridian Hinterlands, concentrating on intensified industrial development focused on the North Circular Road corridor, alongside employment led mixed use development in accessible locations.

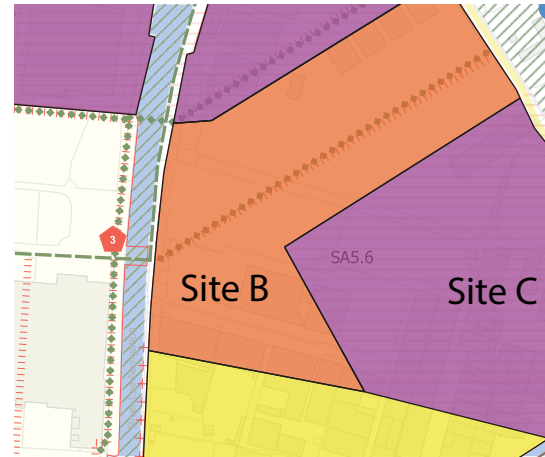


**Figure 9.3:** Specific guidance for Hawley Yard (Parcel A) for intensified SIL

- 9.91 Parcel A: Hawley Yard will be managed as SIL in line with London Plan policies E4 and E5, as well as ELP policies E2, E3 and E5.
- 9.92 New spaces within this area should address the needs of larger industrial and logistics firms, aligning with the Lee Valley's role as set out in the London Plan. Proposed uses should align with the SIL-compatible activities set out in London Plan policies E4 and E5.
- 9.93 To make the most efficient use of land, intensive formats will be encouraged and, subject to viability, decked access to upper floor industrial uses will be promoted.

<sup>57</sup> Paragraph 2.1.32 of the London Plan highlights the ideal location of the Lee Valley for freight and logistics, and states that the Lee Valley 'will continue to play an important strategic role in providing industrial and logistics functions to support the wider London economy and contribute to local employment.'





**Figure 9.4:** Specific guidance for Park Link Route (Parcel B) for SIL release to non-designated status to deliver the Park Link

9.94 In order to facilitate the release of SIL specifically at Parcel B: Park Link Route, Parcel A: Hawley Yard is required to deliver a total of 32,500 square metres of floorspace, which includes B8, B2 and related sui generis uses.

9.95 Incidental E-class floorspace may be appropriate but any significant E-class floorspace demand should, in the first instance, be directed to Parcel B: Park Link Route and Parcel D: Hinterlands South.

9.96 Access to the site should primarily be established from Towpath Road, Argon Road, and development proposals will need to mitigate any impacts on the highways network.

9.97 Early delivery of the floorspace in Parcel A: Hawley Yard is required to facilitate releases in other locations, particularly at Parcel B: Park Link Route.

9.98 Parcel B: Park Link Route plays an important role placemaking and features a walking and cycling route connecting the new Meridian Water residential community with Edmonton Marshes and the Lee Valley Regional Park. Consent has been granted for the Northern Flood Conveyance Channel and its associated access route (planning ref 19/02717/RE3).

9.99 Given this background and the parcel's function in connecting the new park with Meridian Water as a whole, releasing this land from SIL designation is considered appropriate. However, in line with London Plan policy E7, any development will need to preserve the functionality of the adjacent SIL parcels. Any buffering of uses between retained SIL and released SIL, must be accommodated within the released land, wholly within Parcel B: Park Link Route.

9.100 As a release site for SIL the delivery of development at Parcel A: Hawley Yard and Meridian 7 is required to ensure a supply of new SIL floorspace to help mitigate the loss of SIL land. Both of these sites are owned by the London Borough of Enfield, ensuring early implementation in the plan period.

9.101 Parcel B currently accommodates Troubadour Film studios (see planning ref 20/02475/FUL), with a temporary consent set to expire on 7th January 2036. Opportunities exist to re-provide this facility, which is compatible with both SIL and LSIS designations, to Parcel D: Hinterlands South.

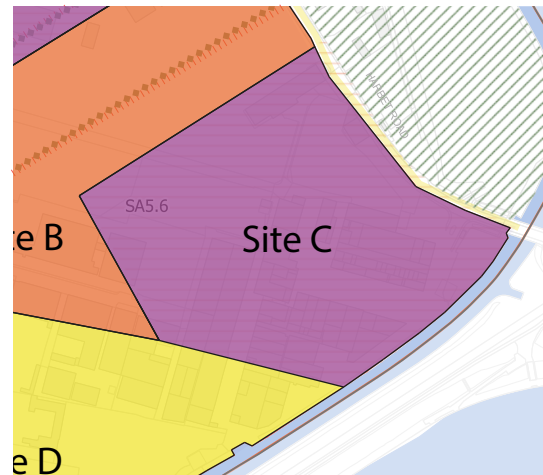
9.102 The waste site ENF25, previously located within Parcel B operated as Environ Ltd, has received planning permission for an alternative non-waste use. Hence, there is no need to provide replacement capacity for this site.

9.103 Within Parcel B: Park Link Route a mix of uses will be encouraged emphasising:

- the incorporation of strong placemaking and design principles to establish strong connection between the Meridian Water community with Edmonton Marshes and the Lee Valley Regional Park, and beyond;
- the provision of active frontages to the public realm to encourage activity, safety and pedestrian use;
- adopts the 'agent of change' principle that maintains the full functionality of neighbouring industrial areas, including intensified SIL at Parcel A to the north and Parcel C to the southeast; and

- the accommodation of lighter employment, including workshops and creative spaces, as part of the industrial led regeneration approach. These uses should predominately occupy ground floor uses in preference to non-employment uses.

9.107 To facilitate the release of SIL elsewhere (Parcel D), Parcel C is required to deliver 38,383 square metres of floorspace across B8, B2 and related Sui Generis uses. The proposed uses should align with the activities compatible with SIL as set out in London Plan policies E4 and E5.



**Figure 9.5:** Specific guidance for Hinterlands East (Parcel C) for intensified SIL

9.104 Parcel C: Hinterlands East will be designated as SIL in line with London Plan policies E4 and E5, and ELP policies E2, E3 and E5. This policy supports an ambitious uplift in SIL floorspace, which will be delivered through intensified formats.

9.105 The new space should address the needs of larger industrial and logistics firms, aligning with the role of the Lee Valley as set out in the London Plan. Intensive formats will be encouraged and, subject to viability, decked access to upper floor industrial uses is recommended.

9.106 Opportunities should be taken to introduce green infrastructure, linking to the adjacent Edmonton Marshes, to support improved biodiversity across the site. Frontages should be oriented to Park Access Route and Harbet Road, fostering an active public realm and taking advantages of views over green for the benefit of workers.

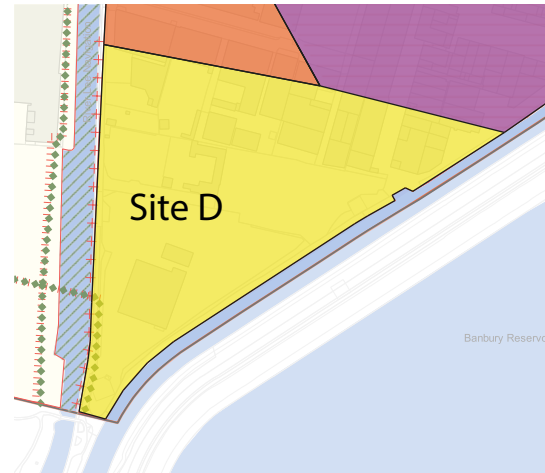
9.108 Incidental E class floorspace may be appropriate, but any significant E-class floorspace demand should, in the first instance, be directed to Parcels B and D.

9.109 Development at Parcel C: Hinterlands East should not compromise the delivery of the extant planning consent for industrial development at the Silvermere site (planning ref 17/02151/FUL).

9.110 This policy provides a strategy for transforming this area into a new, industrial led mixed use regeneration area. Reflecting the current industrial designation and demand for a wide range of industrial formats, this land continues to be crucial in fulfilling our economic needs. However, not all industrial uses need a SIL designation and there is scope to integrate economic uses into a new mixed-use context.

9.111 Parcel D should be focused to the creation of new light industrial spaces, which can include workshops and flexible areas. Certain light depot type and storage uses may be appropriate, provided that they do not need the flexibility offered by a SIL site. The prospect of accommodating Troubadour Film Studios at Parcel D should be explored, whether on a short term or longer-term proposition. Promoters are encouraged to explore opportunities for integrating film studio uses at Parcel D, given the opportunities to growing a creative cluster and exploiting potential for beneficial spillovers.

9.112 While the site operates as 'temporary' or 'meanwhile' SIL, the Council acting as a landlord will use its powers to ensure that any uses are compatible with longer-term LSIS aspirations. Meanwhile, SIL uses could include open storage.



**Figure 9.6:** Transition of Hinterlands South (Parcel D) to LSIS designation

- 9.113 The site currently accommodates two waste facilities: ENF11: Edmonton Bio Diesel Plant (Pure Fuels) and ENF30: Hudson Skip Hire . In line with the provisions of the North London Waste Plan (NLWP2022), compensatory capacity must be provided, prioritising the waste hierarchy and aiming to at least meet, and if possible, exceed, the maximum achievable throughput of the site proposed to be lost.
- 9.114 The site also accommodates an Arriva bus garage. In line with London Plan Policy T3 this site should be safeguarded unless alternative facilities are provided to the satisfaction of TfL, the Council, and service providers, enabling existing transport operations to be maintained and potentially expanded.
- 9.115 Replacement SIL floorspace, for those unable to operate effectively in a mixed use environment, is proposed to be established at Parcel A: Hawley Yard, Parcel C: Hinterlands East, Ravenside, and Kenninghall.
- 9.116 The Council will bring forward a masterplan, in agreement with the GLA, to manage the introduction of non-employment uses while ensuring replacement space is available within Meridian Water for existing businesses.

- 9.117 The masterplan will address the following:
- Interim measures and phasing to manage Parcel D as future LSIS or bespoke guidance as appropriate;
  - Guidance for the permanent development of Parcel D for LSIS type uses, setting out design parameters for industrial-led mixed use development. The guidance will offer practical assistance to ensure that development proposals create a thriving industrial district, with commercial uses concentrated at ground floor level, and residential units designed to facilitate the continued effective operation of adjoining and nearby industrial businesses; and

- A strategy for re-accommodating any existing economic activity on site, at the plan's base date, as part of the redevelopment.

- 9.118 Depending on market evidence and further masterplanning work, a future plan review may support a bespoke mixed use policy to manage this area, instead of an LSIS designation.
- 9.119 Until this masterplan is completed and agreed with the GLA, the Borough cannot immediately release the SIL designation. The London Plan requires that a strategy is in place, along with the delivery of alternative floorspace, before SIL can be released through a plan review. In the absence of an agreed strategy, the land must remain in SIL in this plan review.





# 10 Town Centres and High Streets

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# INTRODUCTION

- 10.1 Town centres offer an accessible focal point of commercial premises, shops, community facilities, leisure activities, and recreational opportunities for the surrounding communities. Attractive town centres have a positive impact on the area's image and character, they play a crucial role in attracting business and investments.
- 10.2 The evolving retail landscape, driven by changes in the retail sector combined with the continued growth of online shopping, requires planning policies that support the continued attractiveness and vibrancy of town centres. This support is essential to maintain their vitality and viability.
- 10.3 In the Borough, the primary retail hub is Enfield Town offering a range of comparison goods shops, leisure services and other amenities. There are also four district centres including Angel Edmonton, Edmonton Green, Palmers Green and Southgate, as well as several large local centres, mainly catering to convenience based shopping and local services in different parts of the Borough.
- 10.4 Policies in the ELP aim to ensure a diverse retail offer and customer choice within town centres and enhance their overall experience, promoting increased footfall and extended stays. Creating desirable and engaging town centres is fundamental to their long term success and the improvement of local area's image and character.
- 10.5 The ELP's strategy focuses on maintaining a range of uses within town centres, fostering an evening economy and establishing a hierarchy of centres. This hierarchy includes a strong, central core of retail and ancillary uses that support their vitality and viability and provide customers with various choices. The ELP also sets out a positive approach towards main town centre uses, defines the hierarchy of centres, explains the operation of the sequential test and impact assessment, and provides a framework within which to assess the appropriateness of development proposals within town centres.

## STRATEGIC POLICY

# TC1 : PROMOTING TOWN CENTRES

1. The long-term vitality and viability of Enfield's designated town centres as defined on the Policies Map will be secured through the following:
  - a. focusing future growth and investment within and around town centres;
  - b. promoting a balance of residential and main town centre uses to help town centres function as multifunctional hubs, supporting the provision of facilities, services, job opportunities and homes;
  - c. maintaining and enhancing their distinctive features and characteristics where these make a positive contribution to the locality, including their built form, historic and cultural character;
  - d. managing streets and spaces to facilitate active travel, improve public transport connections to surrounding areas and reduce traffic flows along key routes;
  - e. reinforcing the diversity and range of activities within town centres through:
    - i. creating inviting public spaces through public realm improvements and cultural attractions to activate the street and foster a welcoming and safe environment;
    - ii. supporting the delivery of a range of workspaces to provide pedestrian footfall and promote a resilient economy; and
    - iii. encouraging connected communities by improving social, civic and cultural infrastructure.
  - f. promoting evening economy activities within town centres while mitigating potential adverse impacts; and
  - g. protecting and promoting commercial activities serving neighbourhood needs in local centres and parades.

## EXPLANATION

- 10.6 Town centres are well connected hubs for a range of activities throughout the day, and evening. They offer accessible retail, commercial, cultural, leisure and civic facilities to both visitors and residents. The policies in the ELP aim to ensure that town centres continue to have an important role in supporting our local communities, which includes directing future growth and investments toward these town centre locations.
- 10.7 There is a need to ensure that town centres remain adaptable in the face of challenges to UK high streets. While retail remains a vital component of town centres, it is equally important that these centres have the ability to evolve and adapt over time, so that they continue to support the communities in which they are situated. Town centre locations provide opportunities for the re-use of buildings, including for other commercial, cultural, leisure and community activities which help to attract visitors. Furthermore, town centres are increasingly becoming a focal point for higher-density, sustainable mixed-use developments, which can include housing.
- 10.8 Enfield's town centres have distinctive characteristics that are reflected in their built form, historic fabric, cultural vibrancy and overall setting. Enfield's
- Characterisation Study helps articulate these qualities. Where new development is proposed it is important that they contribute positively to the character of the townscape, as articulated in [Enfield's Character of Growth study \(2021\)](#). Furthermore, new developments will be expected to create high quality urban environments that are safe, accessible to all, and promote the health and well-being of the local population.
- 10.9 Town centres cater to the needs of workers, traders, visitors and residents, and host a range of civic, cultural and leisure activities. A well-designed and appropriately managed public realm network is essential to support these functions. It is also imperative that town centres remain lively and active places that can accommodate a variety of uses. People should have opportunities for leisure and relaxation throughout the day and evening, throughout the week and during different seasons. Enfield's town centres will be the focus of coordinated public realm improvements, particularly around important gateways such as stations and high streets.
- 10.10 Local centres and parades play a vital role in providing essential shops, facilities and services close to where people live. They serve as valuable capillaries that cater to suburban communities, enabling residents to

access everyday essentials within walking distance. Where possible, we will use our planning powers to protect ground floor commercial frontages in these areas.



Near Southgate

## STRATEGIC POLICY

# TC2: ENCOURAGING VIBRANT AND RESILIENT TOWN CENTRES

1. Town centres should develop as vibrant and economically successful hubs which meet the needs of residents, workers and visitors in line with the following principles (refer to the Hierarchy of Town Centres set out in **Table 10.1**):
  - a. Enfield Town and the district centres of Angel Edmonton, Edmonton Green, Palmers Green and Southgate (as shown on the Policies Map) will accommodate a diverse range of town centre and community uses, along with new residential and employment development.
  - b. Proposals for commercial, business and service activities are acceptable within Enfield Town and the district centres. Such proposals must provide active frontages to the public realm. Proposals for residential uses at ground floor level here will be refused.
  - c. Local centres and parades (as shown on the Policies Map) will serve the retail, food and beverage, business, service and community needs of the local area. Changes of use at ground floor level must retain a shopfront and provide active frontages to the public realm.
2. Proposals for residential uses at ground floor level here will be refused. New local centres will be designated within some strategic mixed-use site allocations to serve the day to day needs of new residents and workers.
2. All development must contribute positively to placemaking in town centres, including through supporting an attractive and accessible public realm, enhancing urban greening and links to blue and green networks, contribute to improving active and public transport links, and addressing anti-social behaviour and crime. New development should preserve designated and non-designated heritage assets and their wider setting while maximising opportunities for enhancements.
3. Proposals for town centre uses are appropriate in designated centres. In line with the sequential approach set out in the NPPF, proposals for town centre uses outside of designated centres must be able to demonstrate that sites firstly within, and then on the edge of existing centres are not available.
4. Outside designated centres, retail and leisure developments (including extensions, the introduction of mezzanine floors and changes of use) exceeding 400 square metres will be subject to an impact assessment.
5. Co-working spaces in town and local centre locations will be actively supported.



## EXPLANATION

10.11 This policy seeks to support the growth of diverse and thriving town centres responding to the plan's objective to create the workshop of London. It establishes a hierarchy of town centres and directs development to designated centres, as described in part 1 of this policy above and **Table 10.1**. Town centre uses are defined in the NPPF.

10.12 The extent of Enfield Town and the district centres, and the Primary Shopping Area within these centres are defined on the Policies Map. It also identifies the local centres and parades.

10.13 This policy seeks to maintain and enhance the role and function of the Borough's designated centres, as defined above. The scale of development should also be appropriate to the size and function of the centre and its catchment area. New development will be expected to make a positive contribution to the vitality and vibrancy of our town centres through successful placemaking. Where applicable, opportunities should be taken to maximise urban greening and integration with blue and green networks. In line with part 3 of this policy, proposals for main town centre uses (as defined in the NPPF), will be directed towards existing centres rather than unsustainable out-of-

centre locations. Retail, leisure and office developments outside of the Borough's centres will need to carry out a sequential assessment in line with the NPPF.

10.14 In situations where no suitable or available sites are present within the boundary of a centre, retail and leisure developments within edge of centre locations that are accessible by public transport, walking and cycling and well connected to and up to 300 metres from the centre, will be permitted. Moreover, retail and leisure developments within out-of-centre locations exceeding 400 square metres of floorspace (gross) will need to demonstrate that they will have no significant impact on the viability and vitality of these centres. In preparing these assessments, applicants will need to give due regard to:

- the scale of the proposal relative to existing centres;
- the cumulative impacts of recent developments; and
- the impact of the proposed development on the vitality and viability of the centre, including local customer choice and trade in the centre and wider catchment area.

10.15 Planning conditions will be imposed on developments outside centres to ensure

that potential changes of use to town centre uses are restricted.

10.16 Proposals involving 'click and collect' parcel lockers will be supported when it can be demonstrated that proposed facilities would not cause harm to the character and appearance of the area, and will not impede pedestrian movement.

Table 10.1: Hierarchy of town centres

TIER	NAME OF CENTRE	ROLE AND FUNCTION
Major Centre	Enfield Town	This centre will continue to be the main focus of town centre uses and other uses which generate a high level of people movements, reflecting its wide catchment area and role as a sub-regional centre.
District Centres	Angel Edmonton Edmonton Green Southgate Palmers Green	Promote as vibrant and accessible hubs containing a wide range of convenience goods, community services and employment uses, serving the needs of the immediate catchment and beyond. The Primary Shopping Area is the same as the boundary of the town centre.
Large Local Centres	Baker Street; Bounces Road; Bowes Road; Bush Hill Park; Chase Side; Cockfosters; Enfield Highway; Enfield Wash; Green Lanes; Hertford Road Central, Lancaster Road, Meridian Water, Oakwood; Ordnance Road, Enfield Lock; Ponders End; Winchmore Hill, Broadway; Winchmore Hill, Green; and Winchmore Hill, Green Dragon.	<p>Safeguard and promote the provision of day-to-day goods, services and community uses to meet the needs of local residents.</p> <p>Each typically accommodate over 40 outlets and over 4,000 sq m of gross floorspace.</p>
Small Local Centres	Aldermans Hill; Arnos Grove; Bush Hill Parade; Cambridge Circus; Freezywater; Hertford Road South; Main Avenue; New Southgate; Silver Street; Windmill Hill; and Enfield Island Village.	As above. Each centre typically accommodates 20 – 40 outlets and less than 4,000 sq m of gross floorspace.

TIER	NAME OF CENTRE	ROLE AND FUNCTION
Local Shopping Parades	Barrowell Green; Brimsdown; Bullsmoor; Bury Street West; Carterhatch Lane; Chaseville Park; Durants Road; Dysons Road; Empire Parade; Enfield Lock; Enfield Road Linkside; Firs Lane; Green Street; Hadley Wood; Hazelbury Road, Edmonton; Hertford Road, North; High Street, Southgate; Hoppers Road; Huxley Parade; Kempe Road; Mottingham Road; Nightingale Road; Percival Road; South Street Ponders End; Southbury Road; Southbury Road/Kingsway, Ponders End; Southgate Green; The Grangeway; Town Road; Victoria Road; Westerham Avenue; Whittington Road, Bowes Park; Winchester Road; Bowes Road West; Chequers Way; Craig Park Road; Fillebrook Avenue; Highlands Village; Lincoln Court; and Clock Parade.	As above. Each centre typically accommodates 6 – 20 outlets (no floorspace defined).

Town Centres and High Streets



Figure 10.1: Hierarchy of town centres

## DEVELOPMENT MANAGEMENT POLICY

### TC3: FLOORSACE ABOVE COMMERCIAL PREMISES

1. Proposals to re-use or refurbish the upper floors of shops and/or commercial premises within Enfield's town centres (as defined on the Policies Map) will be actively encouraged.
2. Proposals resulting in the net loss of residential or employment floorspace will be refused, unless proposals involve conversion to Class E floorspace.
3. All residential developments situated above shops and other commercial premises must meet all of the following criteria:
  - a. the proposal must provide separate and adequate access to the upper floor. Where possible, this entrance should be located on the principal elevation and integrated into a shopfront;
  - b. the proposal must not harm the existing commercial servicing and parking arrangements;
  - c. adequate arrangements for refuse storage and collection should be made; and
  - d. the proposal must not adversely affect the functionality or appearance of the units or the surrounding residential amenity.

#### EXPLANATION

- 10.17 Town centres serves as hubs for a diverse mix of activities, combining both commercial and residential functions. When vacant units exist above commercial premises in these town centres, it presents an ideal opportunity to attract residential uses to increase the numbers of people living within a sustainable location, while contributing towards the Borough's housing requirements. Moreover, encouraging the re-use or refurbishment of units above shops and other commercial premises for appropriate town centre uses, including leisure, entertainment, and intensive sport and recreation activities, offers multiple benefits. These benefits include enhancing the character of town centres, broadening the range of town centre services available, increasing natural surveillance, contributing to regeneration efforts and promoting sustainable utilisation of town centres. This approach also helps reduce the pressure for out of centre developments.



## DEVELOPMENT MANAGEMENT POLICY

# TC4: MARKETS

1. Proposals affecting existing markets will only be supported where:
  - a. they result in a qualitative improvement to the market and public realm;
  - b. the number of trading pitches available will not be reduced; and
  - c. existing traders must be given the opportunity to take up these pitches. A strategy for existing traders to access these pitches should be secured as part of any planning application affecting existing markets.
2. Proposals for new markets will be encouraged where they support Enfield's town centre network and hierarchy and improve the cultural vibrancy of the Borough.
3. All proposals must include adequate arrangement measures to avoid or mitigate unreasonable impacts on the amenity of adjoining and neighbouring occupiers, as well as the wider local area.
4. Outdoor trading will be supported as long as it can be demonstrated that the merchandise will not negatively impact the appearance or functioning of the public realm.

### EXPLANATION

- 10.18 Maintaining the vitality of existing markets is crucial for the liveliness of Enfield's town centres. This policy aims to ensure that there are no reductions in the availability of market spaces and that existing occupiers are protected from displacement.
- 10.19 New markets are wholeheartedly welcomed in centres where they can add to the appeal of these areas. Proposals for new markets should be accompanied by a design and management strategy to ensure they contribute to a safe, clean and attractive public realm and do not impede pedestrian movement.
- 10.20 All proposals must make adequate arrangements to avoid or mitigate unreasonable impacts on the amenity of adjoining and neighbouring occupiers, and wider local area. This includes addressing issues such as footpaths and road congestion, waste/refuse storage and collection, noise and odours. Proposals for street markets must demonstrate that there will be no detrimental effect on the functioning of the road network.



Enfield Town Market Square

## DEVELOPMENT MANAGEMENT POLICY

# TC5: MEANWHILE USES

1. Meanwhile uses should enhance the character and vitality of the area, maintain active ground floor frontages and retain any existing shopfronts. Meanwhile uses should ideally be precursors to the permanent development that follows, providing positive activation of sites for the economic, social and/or environmental benefits to the area.
2. Meanwhile creative, exhibition and performance spaces that align with Culture Connects<sup>60</sup> (or any succeeding versions) and The Heritage Strategy (or any succeeding versions) will be supported, provided they adhere to the agent of change principle.

<sup>60</sup> <https://new.enfield.gov.uk/services/your-council/culture-connects-strategy-2020-25.pdf>

### EXPLANATION

- <sup>10.21</sup> Meanwhile uses are defined as the temporary use of land or buildings before a permanent use is introduced. They have the potential to support the vibrancy of centres by encouraging new business, community, cultural and environmental initiatives, while attracting visitors and footfall. They can help effectively address the issue of vacant units and sites, especially in the early phases of major developments. Developers are strongly encouraged to make vacant land or buildings available for meanwhile activities wherever possible. Multi-phased schemes should demonstrate how they have considered integrating meanwhile uses to activate spaces throughout construction.
- <sup>10.22</sup> Housing may be incorporated into meanwhile uses, serving as a means to offer much needed accommodation and to make efficient use of land while it is awaiting longer-term development. Any proposals for meanwhile housing will need to meet the standards for residential accommodation set out in the development plan.

### Town Centres and High Streets

- <sup>10.23</sup> By temporarily occupying land, buildings or units, meanwhile uses can be low cost and low risk, making them an attractive option to business start-ups, community groups and the creative and cultural sectors. These meanwhile uses can act as productive experimental testing ground for ideas that can be incorporated into the permanent developments that follow. Developers are required to put in place appropriate mechanisms to support occupiers of meanwhile spaces in securing permanent accommodation, including through signposting to appropriate opportunities, potentially within the eventual permanent development.
- <sup>10.24</sup> Meanwhile uses outside town centre locations will be supported, providing they adhere to the agent of change principle. Uses which are not considered suitable for meanwhile uses include vehicle parking.

## DEVELOPMENT MANAGEMENT POLICY

# TC6: MANAGING THE CLUSTERING OF TOWN CENTRE USES

1. All development should actively contribute to the delivery of inclusive and mixed communities, including the vitality and viability of the Borough's centres. Proposals that lead to an overconcentration of hot food takeaways, betting shops, pawnbrokers, pay day loan shops, amusement centres and casinos will be resisted.
  - a. Such development must:
    - a. have no impact on neighbouring residential properties in terms of noise and disturbance; and
    - b. have adequate servicing arrangements and not result in an increase in on-street parking and traffic congestion in the surrounding area.
2. Proposals for establishing hot food takeaways, betting shops, pawnbrokers, pay day loan shops, amusement centres and casinos will only be supported where it can be demonstrated that:
  - a. the site is situated within a designated centre and will not result in an over-concentration of such establishments within any designated centre; and
  - b. they would not cause harm to amenity and the character of the area.
3. Applicants will be expected to submit a Cumulative Impact Assessment as part of any planning application.
4. Proposals for the provision or expansion of banqueting suites will be supported in town centres but resisted in out of town locations, including former retail parks.

## EXPLANATION

10.25 To ensure that the Borough's future growth and development benefits its communities, it is important that planning policies promote an appropriate mix and balance of uses. Policies in the ELP seeks to carefully manage the location of uses recognising that over concentration of particular uses can have harmful impacts, including on the amenity of residential areas, the vitality of town centres and the well-being of the local population. In line with the London Plan, this policy seeks to manage the concentration and proliferation of hot food takeaways, betting shops, pawnbrokers, pay-day loan shops and amusement centres, and their potentially harmful effects on individuals and communities. However, proposals will be considered on their individual merits.

10.26 Planning applications for hot food takeaways, betting shops, pawnbrokers, pay day loan shops, amusement centres and casinos will be assessed having regard to the number and location of units within the major, district or local centre. These planning applications must be accompanied with sufficient information to assess the potential impacts of the proposed use arising, including a Cumulative Impact Assessment.

10.27 Cumulative Impact Assessments should consider the existing distribution of hot food takeaways, betting shops, pawnbrokers, pay day loan shops, amusement centres and casinos within 400 metres (a 5 minute walk) of the application site, and set out measures by which the character, amenity and wellbeing of local residents can be safeguarded.

10.28 Hot food takeaways have the potential to negatively affect the health and well-being of local communities. This policy helps give effect to the London Plan Policy E9 (Retail, markets and hot food takeaways), which encourages Boroughs to manage the concentration of such uses.

10.29 The London Plan indicates that hot food takeaway uses should not be permitted where these are within 400 metres walking distance from the entrances and exits of an existing or proposed primary or secondary school.

10.30 Where planning applications for hot food takeaways are permitted, conditions may be used to ensure compliance with Healthier Catering Commitment standards.

10.31 Banqueting suites can add to the vitality of town centres where they can be sustainably accommodated, offering easy accessibility by foot, bicycle and public transport. They are not appropriate in out-of-centre locations. Banqueting suites should not lead to negative impacts on the surrounding area.



# 11 Rural Enfield

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# INTRODUCTION

- 11.1 The ELP supports the delivery of more homes that meet local needs, thereby enhancing the variety and affordability of available housing options. Additionally, the plan supports greater diversity in Enfield's rural areas, recognising that greater sustainability and resilience can be achieved through encouraging a broader base of activities compared to what has traditionally been accessible in rural areas.



View across rural enfield to central London

## DEVELOPMENT MANAGEMENT POLICY

# RE1 : CHARACTER OF THE GREEN BELT AND OPEN COUNTRYSIDE

1. Development adjoining to or within close proximity to the Green Belt as shown on the Policies Map will only be permitted where:
  - a. it does not have a detrimental impact on the visual amenity of the landscape and openness of the Green Belt;
  - b. there is a clear distinction between the Green Belt and the edge of the urban area;
  - c. views and vistas from the Green Belt into urban areas and vice versa, especially at important access points, are uninterrupted and maintained;
  - d. it establishes and/or extends the Borough's network of greenways and green corridors, retains features of landscape value and incorporates tree planting along transport routes, where possible;
  - e. it complements and improves the quality of existing open space uses and landscaping; and
  - f. it enhances the blue and green infrastructure network through better connectivity and the creation of new publicly accessible open spaces, whilst also conserving their natural and historic value; and
- g. it reinforces and better reveals the character, appearance and significance of designated or non-designated heritage assets and the historic landscape.
2. Development adjoining the Green Belt and open countryside will be expected to:
  - a. incorporate measures to improve the character of the Green Belt and landscape through environmental improvements such as tree-planting and earth moulding, and consider the removal or replacement of visually intrusive elements, such as buildings, structures, hard standings, walls, fences or advertisements, where feasible;
  - b. retain existing features of landscape and townscape value;
  - c. contribute towards the principles of good place-making set out in **Policy SS2**;
  - d. respond to the wider development opportunities, accessibility and environmental enhancements within the Rural Enfield designation (PL9) where feasible;
  - e. conserve and not detract from the open character of Green Belt and surrounding landscape; and
  - f. reinforce and better reveal the character, appearance and significance of designated or non-designated heritage assets and the historic landscape.

## EXPLANATION

- 11.2 This policy seeks to protect and enhance the character of the landscape within or in close proximity to the Green Belt. Enfield has an array of attractive landscapes close to its urban edge. However, “urban fringe”, which serves as the interface between the rural character of the Green Belt and the urban area is very mixed. This policy will ensure that a clear distinction between the character of the Green Belt and the urban area is maintained and where possible will work to strengthen this distinction
- 11.3 To offset the impact of new development around the Green Belt and enhance the quality and amenity value of the landscape, compensatory measures will be used at the urban-rural fringes. These measures may include the creation of new woodland areas and the introduction of active travel routes into existing open spaces.



Hilly Fields Park bandstand



## DEVELOPMENT MANAGEMENT POLICY

# RE2: IMPROVING ACCESS TO THE COUNTRYSIDE AND GREEN CORRIDORS

1. New development will be expected to protect, maintain and improve the Borough's network of walking and cycling routes to meet the needs of all users. Priority will be given to:
  - a. creating interconnected routes with extensions to open spaces along the river corridors, including the Lee Navigation, New River Path and Green Loop;
  - b. creating interconnected routes with spurs to open spaces along the length of the river corridors, including the Lee Navigation, New River Path and Green Loop;
  - c. providing or enhancing way-finding across the network, including the installation of clear signage and gates/stiles to improve legibility of arrival routes and designated points, such as heritage trails and discovery walks;
  - d. extending connections and the right of access into the open countryside, including improved links to important viewing locations, such as the London Loop and Lee Valley Walk, to facilitate the creation of a major green corridor from the Lee Valley Regional Park to Enfield Chase (see policy PL8); and
  - e. Preserving and enhancing the character of historic routes and vistas.
2. Development located within a five-minute walk or within a 400 metre radius from a strategic green link, as shown on the Policies Map, must seamlessly integrate with the wider footpath and cycle network.
3. Development will only be supported where it protects and, where possible, enhances the strategic link route for cyclists, equestrians and pedestrians, while ensuring no adverse impact on the green grid network.

## EXPLANATION

- 11.4 Enfield has an extensive network of walking and cycling routes, ranging from long distance trails such as the London Loop, New River Path and Lee Navigation towpath, as well as a number of urban circular routes and local country paths. Future challenges include increasing activity levels such as walking, cycling and horse riding, improving links from deprived areas to open spaces like the Lee Valley and reducing physical severance. Public rights of way and footpaths are listed on the Definitive Map<sup>62</sup>.
- 11.5 The Council has a legal duty to keep the Definitive Map updated and to protect the public's use of rights of way in the Borough. This involves working with landowners, those who maintain the public rights of way and voluntary groups to ensure that footpaths remain clear and properly maintained, achieved through actions such as the removal of vegetation, provision of signage and maintenance of gates and stiles, thereby ensuring accessibility to all.
- 11.6 This policy seeks to provide an integrated network of convenient and well-maintained routes, offering good access to the open countryside and visitor attractions, while accommodating the needs of various user groups, including equestrians, pedestrians, cyclists, people with visual or mobility impairments, and those with pushchairs. It also aims to ensure that new developments facilitate access to open space and nature, especially along strategic links.

<sup>62</sup> <https://new.enfield.gov.uk/services/roads-and-transport/public-rights-of-way/>

## STRATEGIC POLICY

# RE3: SUPPORTING THE RURAL ECONOMY

Support will be given to proposals in suitable locations which seek to improve the balance of jobs within the rural areas and diversify the rural economy. The following provisions apply:

1. Appropriate and proportionate expansion of existing employment sites in order to support the retention and growth of local employers will be supported, subject to an assessment that demonstrates no adverse residual impacts on neighbouring uses and the environment.
2. Business start-ups, home working, small scale employment and the development and expansion of small business in residential and rural areas will generally be supported, subject to an assessment that demonstrates no residual adverse impacts on neighbouring uses and the environment.
3. Proposals should explore opportunities to improve internet connectivity for rural communities where appropriate.
4. Support will be given to the reuse of suitable buildings for employment uses.
5. The creation of new, or extensions to existing, garden centres or farm shops in the open countryside will only be permitted if the proposed development is ancillary to, and on the site of, an existing horticultural business or existing farming operation.
6. Development will be supported which meets the essential needs of agriculture or forestry interests.
7. The loss of tourist or leisure development will only be permitted where there is no proven demand for the facility.
8. Camping, caravan, chalet or similar facilities that respond to an identified local need will be supported, provided the proposal is compatible with the existing road network, and has no adverse environmental impact.
9. Development proposals should:
  - a. demonstrate safe access to the existing highway network;
  - b. avoid a significant increase in the number of trips requiring the private car and facilitate the use of sustainable transport, including walking and cycling, where appropriate. Sustainable Travel Plans will be required to demonstrate how the traffic impacts of the development have been considered and mitigated;
- c. demonstrate how a positive relationship with existing buildings has been achieved, including scale, design, massing and orientation; and
- d. avoid incongruous or isolated new buildings. If there are unused existing buildings within the site, applicants are required to demonstrate why these cannot be used for the uses proposed before new buildings will be considered.

## EXPLANATION

- 11.7 To promote economic growth and diversification in the rural areas of the Borough, it is important to make land available for business use. It is recognised that some economic activities do not have a land requirement, for example where small businesses can be established from home, and permitted development rights also enable some home working use. However, to support the growth and prosperity of the rural economy, a positive strategic framework is needed to bolster sustainable rural development.
- 11.8 This policy provides some flexibility to enable carefully selected development outside settlements where it can be demonstrated that this could be achieved sustainably. This consideration should take into account the provisions of the NPPF and the need to effectively manage potential traffic and environmental impacts.



Forty Hall Farm

## DEVELOPMENT MANAGEMENT POLICY

### RE4: FARM DIVERSIFICATION AND RURAL EMPLOYMENT

1. Proposals involving a change of use or diversification of farms from solely agriculture to ecological, business, tourism or sport and recreational uses will be supported where the proposed use:
  - a. would not harm the openness and character of the Green Belt in terms of scale, location and design;
  - b. does not unacceptably impact upon surrounding amenities or cause an unacceptable level of noise, light, air or water pollution;
  - c. provides adequate landscaping and screening to minimise any potential visual impact;
  - d. does not have any detrimental impact on nature conservation, wildlife habitats, designated and non-designated heritage assets (including their setting);
  - e. does not generate a significant number of additional vehicle trips; and
  - f. contributes to regeneration and achieving the strategic policy priorities of this plan such as initiatives relating to landscape restoration, culture and tourism etc.
2. Proposals which promote sustainable agriculture and public participation in food growing, especially those which contribute to education, training and the development of local supply chains, will be supported.
3. For equine-related development, adequate arrangements should be made for the management of grazing areas. Hard-surfaced areas should be kept to a minimum.

#### EXPLANATION

- 11.9 Farm diversification into non-agricultural uses is vital to the continuing viability of many farm enterprises. The Council will actively support well-planned diversification initiatives that align with sustainable development objectives and help to sustain the viability of the agricultural enterprise.
- 11.10 Proposed diversification schemes must avoid unnecessary buildings that would be detrimental to the Green Belt setting. Additionally, these proposals should have regard to the National Planning Policy Framework (NPPF) and the Green Belt policies set out in this plan and the London Plan.
- 11.11 Horse riding is a popular recreational activity and a number of sites in the Borough are used for horse keeping and breeding. The policy seeks to manage potentially negative impacts, as the paraphernalia associated with horse keeping can be inappropriate if they detract from the openness of the Green Belt.



# 12 Culture, Leisure and Recreation

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# INTRODUCTION

- 12.1 Enfield has a wealth of historic and culturally significant buildings, a thriving artistic community and a diverse range of recreational opportunities, green spaces, parks and watercourses, all of which make it an attractive location for visitors. The transformative potential of creativity in driving positive economic and social progress in the Borough is deeply intrinsic to our local identity.
- 12.2 Our shared experiences, varied heritage, talents, skills and interests play a central role in shaping Enfield as a vibrant, distinctive and healthy place to live and work. Arts and cultural experiences, whether rooted in a cultural or community venue, at homes or at schools, hold intrinsic value for our well-being and sense of belonging. The broad accessibility of culture across the borough, and the many ways in which culture meets wider strategic objectives that contribute to and enrich our lives, underpins the ELP.
- 12.3 Every year, the creative industries in the UK contribute £111.7 billion gross GVA to the economy, while culture adds £5.2 billion to London. Globally, creative industries are a thriving sector, responsible for creating one in six jobs<sup>63</sup>. Enfield's local cultural offer, found in various venues, heritage

houses and gardens, parks, open spaces, high streets, cafés and neighbourhood halls, are fundamental to the Borough's appeal and its ability to foster community and attract visitors. Investment in culture is reaped in so many ways that are vital to our social and civic fabric, including addressing inequality and fostering economic growth.

- 12.4 The Cultural Strategy for Enfield (2020 – 2025)<sup>64</sup> sets out a robust framework to strengthen and enrich culture across the Borough. This strategy sets out three key priorities that underpin the creative ambitions for the Borough, including: Sustainable Culture, Creating Opportunities for Young People and Culture Everyday. In addition, the strategy sets out five focus areas that represent the interconnected parts of Enfield's Cultural ecology.

<sup>63</sup> Source GLA & Creative Industries Federation.

<sup>64</sup> [https://governance.enfield.gov.uk/documents/s84477/finalEnfieldCS\\_Draft\\_L.pdf](https://governance.enfield.gov.uk/documents/s84477/finalEnfieldCS_Draft_L.pdf)



Library Green - Moon

## STRATEGIC POLICY

# CL1 : PROMOTING CULTURE AND CREATIVITY

1. Proposals will be supported which promote culture and creativity that align with the objectives within the Cultural Strategy for Enfield (2020-2025), or any subsequent strategy. This should be achieved through the provision of new cultural infrastructure and creative workspace, or through the re-use of existing facilities. Proposals situated within accessible locations, particularly town centres, are strongly encouraged.
2. Proposals to replace existing arts, cultural and entertainment uses including but not limited to theatres, pubs, music venues, nightclubs, galleries, museums, cinemas and community halls will not be permitted unless the following can be demonstrated:
  - a. the use is demonstrated as surplus to requirements and is no longer economically viable or capable of being operated on a community or non-for-profit basis;
  - b. alternative provision has been made in the vicinity to an equal or better standard, in line with the priorities set out in the Cultural Strategy for Enfield (2020-2025) or any updated strategy; and
  - c. appropriate marketing efforts have been undertaken over a continuous period of at least 12 months.
3. New arts, culture and entertainment uses will be directed to Enfield Town, the four District Centres and Meridian Water, in line with the town centre hierarchy. Other locations which are easily accessible by public transport, walking and cycling will also be considered. Outdoor arts, culture and performance activities and festivals will be supported where it can be demonstrated that residential amenity can be protected. Major cultural and art developments must set out their contributions to Enfield's cultural offer. The diversification of existing facilities will be encouraged.
4. Creative industry uses will be supported in Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs).
5. Planning contributions will be sought towards the provision and maintenance of public art installations and cultural facilities from developments comprising 50 or more residential units. Contributions from non-residential schemes will be assessed on a site-by-site basis, taking into account the location, nature, scale of the proposed development and the extent of public accessibility to the site.



## EXPLANATION

12.5 This policy seeks to expand and promote the cultural offer in the Borough to foster connections among our diverse communities and improve the places in which they live, work and enjoy leisure. This will involve:

- protecting existing venues such as theatres;
- encouraging the refurbishment of existing venues;
- reusing vacant and underused buildings and spaces; and
- encouraging the establishment of new venues in suitable locations such as town centres and areas with good transport connections which support the creation of vibrant and creative places.

12.6 Enfield, located as part of the UK Cambridge Innovation Corridor and within close proximity to the emerging Thames Estuary Production Corridor, is strategically positioned to generate exciting new creative initiatives and partnerships within and beyond its boundaries. This includes the development of large scale film and TV production facilities, spaces for gamers and makers, and associated support services like training<sup>65</sup>. These activities can form part of a diversity of uses in the Borough's Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs), as set out in Chapter 9 of the ELP.

12.7 Funds generated from developments will be ringfenced into a dedicated cultural fund to support projects identified through the Infrastructure Delivery Plan. Where possible, residents, artists and other groups should be actively engaged at an early stage of the creative process.



Bloqs, Meridian East

<sup>65</sup> In line with the Cultural Strategy



## DEVELOPMENT MANAGEMENT POLICY

# CL2: LEISURE AND TOURISM

1. Proposals that will continue to develop a high-quality visitor experience to increase the contribution that tourism, arts and cultural heritage and sport make to our quality of life and social well-being will be supported, in particular:
  - a. the provision of new and enhanced visitor attractions, including arts and cultural facilities, in accordance with the sequential test outlined in the NPPF for main town centre uses;
  - b. the provision of new and improved accommodation and conference facilities for tourist and business visitors in accordance with the sequential test;
  - c. sustainable rural tourism and leisure developments that benefit businesses, communities and visitors in the rural areas as long as they respect the size, character and function of their setting and comply with national Green Belt policy. This support extends to the re-use of suitable rural buildings for visitor accommodation and other small scale rural development; and
  - d. proposals which promote greater use of rural parts of Enfield and the Lee Valley as a leisure and recreational resource
- without harming local biodiversity or water quality.
2. The loss of existing visitor, leisure and cultural attractions, including arts and entertainment facilities, hotels and sport venues will be strongly resisted unless replacement facilities of an equivalent or better standard and provision are proposed in a location equally accessible to the facility's current catchment area. Robust evidence must be provided that demonstrates that the facility causes significant detriment to the amenity of the locality or that:
  - a. there is no longer a need for the existing facility or an alternative leisure or visitor use; or
  - b. the existing use is unviable and its retention has been fully explored, including active and comprehensive marketing (for a period of at least 18 months) the facility for its existing and alternative leisure or visitor use prior to the submission of a planning application.



## EXPLANATION

12.8 The Council considers that the leisure and visitor experience in the Borough has the potential to contribute significantly to Enfield's economic growth. It can contribute to enhancing the quality of life by delivering experiences for visitors and generating a greater variety of job opportunities and training prospects. Importantly, it plays a pivotal role in supporting regeneration efforts and the diversification of the rural economy. Policies in relation to sport are covered in policies CL4 and CL5 of this plan.

12.9 A key objective of the ELP is to actively promote and sustainably develop Enfield's visitor economy. To work with this objective, the Council will continue to protect existing visitor and leisure facilities while actively promoting the sector's sustainable expansion. The provision of arts and cultural facilities, in particular has the potential to broaden the Borough's offer and increase its appeal to visitors. An integrated approach will be taken to ensure that these objectives are reflected in local initiatives such as town centre management, regeneration, open space strategies, heritage enhancement programmes, countryside management and environmental stewardship. This policy encourages development which supports the sustainable growth of the tourism industry.

12.10 Visitor related developments by their nature are often located in sensitive areas and their benefits need to be carefully balanced against the need to protect the rural parts of Enfield and safeguarding heritage assets from overcrowding and degradation. The plan seeks to ensure that the natural landscapes and heritage sites that significantly contribute to the Borough's appeal as leisure and visitor destinations are preserved. Any new built development must complement the natural attractions of the landscape and reflect the character of the surrounding area. Landscape design, careful siting of developments, re-use of buildings and attention to detail can help these developments in respecting their environments.

12.11 The Council also recognises that tourism is an important sector of the rural economy with great potential for further growth. Appropriate development can help sustain rural services and generate significant benefits for local communities. In accordance with the National Planning Policy Framework (NPPF), we should support sustainable rural tourism and leisure developments, including the provision and expansion of visitor facilities in appropriate locations, where identified needs are not met by existing facilities in rural service centres. As

a result, small-scale developments proposing additional floorspace for leisure and visitor use in rural areas will not be subject to the sequential test.



School trip



## DEVELOPMENT MANAGEMENT POLICY

### CL3: VISITOR ACCOMMODATION

1. Support will be given for proposals which protect and deliver growth for the visitor economy. Hotels and other strategically important visitor accommodation will be directed towards Enfield Town and the district centres, and other accessible locations which are within walking distance of public transport interchanges and/or stations.
2. Proposals involving new or extended visitor accommodations will be supported where they:
  - a. do not result in the net loss of existing housing and design and servicing arrangements can safeguard the amenities of nearby residential occupiers;
  - b. are proportionate to their location in terms of size, scale and function;
  - c. do not result in an overconcentration of similar uses in the locality;
  - d. provide active ground floor frontages and incorporate ancillary uses and facilities that are accessible for public use, particularly in town centre locations;
  - e. provide a level of car parking that is appropriate to the public transport accessibility level of the site, whilst seeking to minimise car parking wherever possible;
- f. ensure adequate access, drop off / pick up and servicing arrangements appropriate to the size and location of the accommodation;
- g. maximise opportunities for walking, cycling and use of public transport
- h. are sympathetic to the character of the area, but also able to create new places which reflect current times and needs and which are fit for purpose;
- i. provide adequate standard of amenity for occupants and provision of accessible accommodation, in line with London Plan requirements; and
- j. make appropriate arrangements for long-term adaptability and sustainability.
3. Proposals which deliver visitor accommodation on appropriate sites, including small hotels, bed and breakfast and self-catering accommodation will be supported.
4. Proposals for camping facilities and the conversion of existing buildings to accommodate visitors in rural parts of Enfield will be supported, especially within Enfield Chase in line with policies RE4 and PL8.
5. Development proposals which result in the loss of important facilities for the visitor economy, including visitor accommodation, will not be permitted unless:
  - a. There are over-riding sustainability and regeneration benefits from the proposal; and
  - b. The existing use is demonstrated to be unviable and with no reasonable prospect of becoming viable.

## EXPLANATION

12.12 The inclusion of hotels and short-term stay accommodation as part of a mix of uses serves to bolster the vibrancy of town centres, particularly during the evening hours and supports tourist-based activities. For the purpose of this policy, visitor accommodation includes a range of options such as hotels, bed and breakfasts, traveller / youth hostels, short-term holiday rentals and serviced self-catering apartments.

12.13 Any new visitor accommodation, like all other forms of development, must positively contribute to the character and overall setting of its location. The nature and scale of the accommodation should be proportionate to its surroundings, recognising the various typologies of visitor accommodation within the C1 use class. For instance, a large format hotel may be more appropriate at a prominent town centre location or at a key transport interchange, whereas a smaller scale boutique hotel or serviced apartment may be more sensitively integrated elsewhere in the Borough.

12.14 Major visitor accommodation, such as hotels located outside town centres, will be subject to the sequential test in line with the National Planning Policy Framework (NPPF). In urban locations, newly established visitor

accommodation will be expected to maximise opportunities to deliver active ground floor frontages and include appropriate ancillary uses. Ancillary functions may include reception areas, cafés, restaurants, conference facilities, salons, fitness studios and other facilities that can also benefit the local community as well as visitors using the accommodation.

12.15 In recent years, the visitor economy has benefited from the growth in short-term serviced accommodation<sup>66</sup>, often offering a unique and affordable alternative to conventional hotel rooms. It is imperative that short term serviced accommodation do not compromise the supply of conventional housing or disrupt the amenity/balance of uses in the area. As part of the short-term letting agreement, applicants will be required to submit details of a management plan so to ensure rooms will not be occupied for periods exceeding 90 days. We expect the use shall be secured in the form of a licence, not a lease.

12.16 Visitor accommodation in rural parts of Enfield can have the potential to facilitate greater public access to the countryside and the leisure and historic attractions in the northern part of the Borough. However, these proposals should not run counter to Green Belt

purposes, and they must demonstrate acceptable access and servicing arrangements. These proposals should also avoid causing harm to biodiversity and the character of the area. The presence of many hotels providing such services is often dependent on a scenic rural location and spacious settings. To encourage the provision of more hotels and diversification of the rural economy, proposals involving the re-use of suitable rural buildings (as those considered by the Council to be of a permanent and substantial construction) or comprehensive redevelopment of previously developed land for visitor accommodation in rural areas will generally be supported, provided that their locational requirements are well justified. This approach accords with the National Planning Policy Guidance (NPPG), which recognises that the market and locational requirements of some main town centre uses may only be accommodated in specific locations.

12.17 Proposed developments for visitor accommodation in rural areas should, where possible and relevant to its function and location, facilitate the use of sustainable transport, including walking and cycling, as set out in Policy RE4.

<sup>66</sup> [https://www.london.gov.uk/sites/default/files/housing\\_research\\_note\\_4-short-term\\_and\\_holiday\\_letting\\_in\\_london.pdf](https://www.london.gov.uk/sites/default/files/housing_research_note_4-short-term_and_holiday_letting_in_london.pdf)



## STRATEGIC POLICY

# CL4: PROMOTING SPORTING EXCELLENCE

1. Development and investment decisions that align with the objectives of the Enfield Health and Well Being Strategy will be supported, particularly when they align with the following criteria:
  - a. they promote and celebrate Enfield's growing reputation as a nationally and internationally recognised hub for sporting and recreational for aquatic and water sports, as well as mass participation outdoor sports, which contribute to overall health and wellbeing;
  - b. they facilitate and contribute towards the development of first-class, publicly accessible strategic sport and leisure facilities to meet the needs of the growing population, based on the following hierarchy of priority locations as shown on the Policies Map, including:
    - i. Land at and within the vicinity of Tottenham Hotspur's football club, the training ground, Hotspurs Way, Whitewebbs Lane (RUR.0+);
    - ii. Land at Picketts Lock (RUR.06);
    - iii. Enfield Playing Fields; and
    - iv. Firs Farm.
  - c. they seek opportunities to protect, expand and improve the quality and condition of Enfield's sport and physical health facilities (to prevent disrepair and unsafe areas), with better public transport and active travel connections to residential areas and open spaces, in line with the priorities set out in the Playing Pitch Strategy and Blue and Green Infrastructure Strategy;
  - d. they facilitate outdoor sports provision (including camping sites, small stables, training academies, golf centres and changing facilities) within locations that offer good access to public transport, cycling and walking in the open countryside, especially within the Enfield Chase, while in line with national Green Belt policies; and
  - e. they secure new sport and leisure facilities within public parks like green gyms and large-scale mixed-use developments to meet the identified needs.
2. The Tottenham Hotspurs Training Centre and surrounding land as shown on the

Policies Map and as Site Allocation policy RUR.0+ continues to be designated as Green Belt. This designation allows for the potential development of professional and community sports, recreation and leisure facilities, including ancillary and related uses, in line with Green Belt policies in this plan, as well as the following considerations:

- a. Any development related to professional and community sports, recreation, and leisure facilities, whether appropriate or inappropriate in Green Belt development, must meet the following development management criteria:
  - i. address strategic and local transport considerations, including potential improvements to the site's connectivity with the surrounding public transport network;
  - ii. optimise pedestrian and cycling access to and through the designated site;
  - iii. adhere to high-quality design standards, including high sustainable construction and operational standards.

- iv. take into account the site's heritage context and its impact upon any statutorily or locally listed asset, including but not limited to, the Forty Hall Conservation Area;
- v. restrict built development on the small paddock field to the north of Myddleton House, or at Beggars Hollow; preserve and enhance those parts of the Registered Parks and Gardens of Myddleton Hall and Lee Valley Regional Park which fall in the designated site, or where there are key aspects of their setting in the designated site;
- vi. protect local heritage assets in Myddleton and Whitewebbs Park;
- vii. retain existing watercourses, ponds, trees and other biodiversity features, where necessary for biodiversity conservation;
- viii. ensure no unacceptable visual and landscaping impacts, whilst protecting important views and gaps, including those from Forty Hall Conservation Area;
- ix. implement new landscaping with appropriate species selection and management to enhance biodiversity and climate change resilience;
- x. deliver community access, education, and socio-economic improvements available to all sectors of the community; and
- xi. comply with other relevant policies of the Local Plan.

## EXPLANATION

- 12.18 Enfield enjoys a unique position, offering convenient access to both the open countryside and central London. This accessibility provides residents and visitors with unrivalled access to sporting attractions, including:
- golf courses like Whitewebbs Park
  - leisure centres with Picketts Lock as the largest indoor and outdoor athletics centre in South East England;
  - camping and visitor sites;
  - a range of water-based activities;
  - adventure playgrounds such as those found in Trent Park;
  - training grounds like the Hotspur Way Training Ground; and
  - a well-established community network of facilities for sports such as football, rugby, hockey and tennis.
- 12.19 Sport plays a fundamental role in Enfield's leisure and visitor offer, making substantial contributions to London's economy and cultural life. While the Borough is already home to world class facilities like the Lee Valley Regional Park, we want to build on this success and support the Mayor of London's ambition to become the most physically active city in the world.

12.20 Despite rising levels of physical activity and sport participation in the Borough, they continue to remain below the London average, especially among lower social economic groups. There is significant latent demand, representing an opportunity to improve the quality and range of sport and outdoor leisure facilities. However, the prevalence of obesity and mental health issues among adults and young children remains a concern, leading to associated healthcare costs.

12.21 This policy seeks to promote and encourage sporting excellence across the Borough, including the development of world-class sports facilities at locations like the Tottenham Hotspur Training Ground, Picketts Lock (and the immediate surrounding area), Enfield Playing Fields and Firs Farm. In turn, this will:

- improve the health and wellbeing of residents, encouraging greater physical activity;
- provide new sports, recreation and leisure facilities which are open to the wider community in accessible locations while respecting the professional sporting function of the Tottenham Hotspurs Training Centre;
- promote social inclusion, increased community safety and security;

- support economic growth, generating employment opportunities for local residents;
- encourage sustainable travel choices and connections with surrounding public transport nodes;
- improve access to the open countryside, nature and key attractions, including east–west connectivity throughout the Borough;
- improve green and blue networks; and
- sustain and enhance the significance of heritage assets and open character of the landscape.

12.22 The hierarchy of priority locations as outlined within the policy sets out that the national, regional, sub-regional, or Borough-wide importance of the facilities at each of these locations based on their quality, scale and type. This hierarchy does not relate to the allocation of investment.

12.23 Outdoor sport and recreational uses are generally considered appropriate development within the Green Belt, as long as these uses and the associated facilities maintain the openness of the Green Belt and do not conflict with any of the five purposes including the land within it. The proposed policy designation supports the delivery of such uses, where they meet the development management criteria.

12.24 For uses or facilities that fall outside the definition of appropriate development, meaning that by definition they are inappropriate development in the Green Belt, but are deemed acceptable in principle within the policy designation, they must satisfy both the ‘Very Special Circumstances’ (VSC) test outlined in national Green Belt policy and meet the development management criteria provided. The policy designation provides a range of development management criteria (see part 2 of the Policy) that any development which comes forward under the designation must meet, regardless of whether it is deemed appropriate or inappropriate under Green Belt policy.



Myddleton House

## DEVELOPMENT MANAGEMENT POLICY

# CL5: SPORT, OPEN SPACE AND RECREATION

1. Proposals involving the creation of new sports facilities or the enhancement of existing ones, specifically where a need has been identified, will be supported, particularly in or close to town centres and easily accessible locations. Proposals that include bringing private and educational related sports will be supported, with the condition that these development maintain or enhance their quality standards and reflect the most up to date Enfield Playing Pitch Strategy, Enfield Built Sports Facility and their respective Action Plans.
2. Development proposals that result in the loss of sports and recreational buildings and land will be resisted unless:
  - a. an assessment has been undertaken, clearly demonstrating the facilities to be surplus to requirements; or
  - b. the loss resulting from the proposed development would be replaced by an equivalent or better provision in a suitable location; or
  - c. the development is intended for alternative sports and recreational facilities, for which the needs clearly outweigh the loss incurred.
3. Major residential development will be required to improve open space provision, compatible with the needs and demands arising from the development and physical constraints of the site. Smaller developments will also be encouraged to incorporate open space enhancements, where feasible.
4. New open spaces, accessible to the public and consolidated, should be integrated on site, particularly in areas of deficiency and priority locations. Where on-site provision is not possible due to reasons such as site constraints, viability and competing policy objectives, off site contributions will be sought to improve open space enhancements in the vicinity of the site, based on the priorities set out in the Blue and Green Infrastructure Strategy and policy SP BG1.
5. Open space provision within developments should meet the standard of 'good to 'very good' quality, in line with the Green Flag Award, and adhere to the principles outlined in the Accessible Natural Greenspace Standard.
6. Developments that enhance or provide open space, sport and leisure facilities will be expected to:
  - a. meet the standards relating to quality, quantity and accessibility set out in **Table 12.1**;
  - b. be visible and accessible from the public realm surrounding the site;
  - c. establish well-connected pathways and directional signage linking them to other open spaces and routes, especially to public transport connections;
  - d. facilitate pedestrian and cycling movement both within the development site and wider area;
  - e. demonstrate flexibility, adaptability and multifunctionality, catering to the needs of different users and changing demands;
  - f. explore opportunities for co-location with other facilities, such as sport and leisure amenities where possible to promote more active and healthy lifestyles;
  - g. integrate soft landscaping, street furniture and sustainable urban drainage systems into the design and layout, ensuring they can be maintained over the lifetime of the scheme; and



- n. enhance the biodiversity of the site, contributing to the objectives identified in the Enfield Biodiversity Action Plan.
- 7. Development should not solely depend on existing publicly accessible open spaces to contribute towards the requirements for on-site communal amenity space and children's play space.

### Playspace

- 8. In areas where there is a deficiency of children's play space or where the nearest play space is over 200 metres away, developments are required to provide on-site children's play spaces to meet the needs arising from the development, accommodating a mix of ages and backgrounds. Major development should provide a minimum of 10 square metres of play space per child.

### Sport, leisure and recreation

- 9. Development involving more than 100 homes or exceeding 10,000 square metres of floorspace will be expected to meet the demands it generates by providing on-site sport, leisure and recreational facilities, or by making a contribution toward the development of new or improved facilities within the

vicinity of the site, especially where there are existing deficiencies (as identified in the Playing Pitch Strategy and Blue and Green Infrastructure Strategy). These sport, leisure and recreation facilities must be designed and constructed in line with Sport England guidelines and relevant guidance from national sport governing bodies.

- 10. The Council will ensure that development and growth are accompanied by an appropriate level of playing pitch facilities. This will be achieved through protecting and improving the stock and capacity of playing pitch facilities, as well as improving the quality of existing playing pitches and their ancillary facilities.
- 11. New residential development on larger sites will, where practicable, be expected to deliver new playing pitch facilities on site as part of an integrated scheme. On smaller sites or where on-site provision is not practicable, planning obligations will be sought to mitigate for the impact of new residents through the creation of new or improved provision in an appropriate location.
- 12. Wherever possible, new playing pitches on existing or proposed school sites (as shown on the policies map) should include natural grass pitches. Proposals

involving artificial pitches must:

- a. not have an adverse impact on the amenity of local residents and neighbouring sites in terms of noise and light pollution;
- b. avoid light spill from floodlighting into Metropolitan Open Land and the Green Belt (as shown on the Policies Map) unless very special circumstances can be demonstrated in line with policies SP BG4 and BG5; and
- c. ensure that site is level and has suitable ground conditions.

EXPLANATION

12.25 For the purposes of this policy, the term ‘sport and leisure provision’ covers various facilities and areas intended for sports and recreational activities, including:

- indoor sports facilities such as swimming pools, health and fitness gyms and sport halls;
- sports pitches identified in the Playing Pitch Strategy;
- golf courses;
- outdoor waterspace;
- multi-use games areas and their associated facilities;
- outdoor gyms and athletic tracks; and
- playing fields and sites located within educational establishments.

12.26 It is essential that everyone in Enfield, regardless of age, physical ability, or disability has equal access to the wide variety of sports, leisure and physical activities available in the Borough. Promoting active lifestyles can lead to numerous health and wellbeing benefits, ranging from lower levels of cardiovascular disease through to maintaining a healthier body weight and lowering levels of depression. In Enfield, physical activity and sports participation are lower than the national average, and obesity rates are higher than average.

However, there remains a considerable unmet demand for various activities particularly related to playing pitches, presents opportunities to increase participation, especially in deficient areas.

- 12.27 Playing pitches are a key part of the Borough’s sporting offer, significantly contributing to the health and wellbeing of our communities. It is important to protect, enhance and provide new facilities based on up-to date assessments. The Playing Pitch Strategy identifies a number of priorities in respect of sport, leisure and recreational pitches, including:
- protecting and improving the quality of existing sport facilities, especially artificial grass hockey pitches, rugby pitches and cricket pitches;
  - increasing public access to sport and leisure facilities (including school playing fields and sport halls) though the use of community use agreements and management contacts; and
  - securing additional full-sized pitches, such as 3G football pitches, junior rugby pitches and artificial cricket wickets/squares, along with associated improvements like new or refurbished changing rooms, floodlights and drainage installations, to meet projected demand.

12.28 The policy distinguishes between larger and smaller sites as detailed in part 10. This differentiation reflects the general principle that it is better to provide playing pitches closest to the point of need. Nevertheless, the application of this principle will need to be determined on a case-by-case basis, taking into consideration not only to the practicality and viability of delivering on-site facilities, but also to the context of the development in relation to other sports infrastructure within the locality. For example, creating sports facilities as part of a network, rather than as isolated facilities, is more appropriate. For this reason, this policy does not identify a specific size threshold to define ‘larger sites’, allowing this determination to be made during the planning application process.

12.29 Sport, leisure and recreation facilities should reflect guidance from Sport England, other national sport governing bodies and active sport and leisure organisations. Applicants will be advised to consult with Sport England and relevant national sport bodies, and local sports and leisure organisations prior to the submission of their planning applications. Developments that enhance or provide open space, sport and leisure provision will be expected to meet the standards relating to quality, quantity and accessibility set out in **Table 12.1.**

<sup>67</sup> [https://new.enfield.gov.uk/services/leisure-and-culture/sports-facilities/playing\\_pitch\\_strategy\\_sports\\_180319.pdf](https://new.enfield.gov.uk/services/leisure-and-culture/sports-facilities/playing_pitch_strategy_sports_180319.pdf)

- 12.30 The latest assessment of the Borough’s open spaces, including their quality and value based on the criteria established by the Green Flag Award is provided in the most recent audit of Enfield’s existing blue and green infrastructure.
- 12.31 This policy also sets out more detailed requirements relating to the design and layout of new or improved open space within new developments and their integration into the wider blue-green network. Open space should form the centrepiece of new developments and should blend with the surrounding urban form. These individual spaces should also be seamlessly integrated into the wider public realm and green grid network.
- 12.32 Regeneration initiatives for housing estates should maximise the reuse of existing publicly accessible spaces, accompanied by the incorporation of new open spaces such as pocket parks, communal gardens and linear verges to meet the needs of new residents.
- 12.33 Where sites have multiple owners, developers and landowners will be strongly encouraged to work jointly to develop masterplans or design codes covering the entire allocation or developable area. This joint working arrangements aims to secure consolidated publicly accessible open spaces, taking into account technical feasibility and other pertinent planning considerations.
- 12.34 Newly created publicly accessible open spaces, like parks should achieve the national standards of green space quality as outlined in the Green Flag Award, and for natural green space accessibility, following the Accessible Natural Greenspace Standard (ANGSt) best practices. These spaces will be assessed against the quality and accessibility criteria set out in these standards.
- 12.35 The development of new children’s play space will be assessed against the principles of good design set out in Play England’s “Design for Play” guide. GLA’s child yield calculator should be used to determine the number of children expected to reside in a given development.

Table 12.1: Open space standard

TYPE	QUANTITY: THE PROVISION (MEASURED IN HECTARES) OF EACH TYPE OF OPEN SPACE WHICH SHOULD BE PROVIDED AS A MINIMUM	ACCESSIBILITY: THE MAXIMUM DISTANCE RESIDENTS SHOULD BE REQUIRED TO TRAVEL TO USE AN OPEN SPACE
Open space	2.15 ha per 1,000 population	Parks and gardens / natural and semi-natural green space: Metropolitan: 3.2km District: 1.2 Local: 400m Small local: 280m Amenity green space: 400m
Allotments or community garden	0.125 ha per 1,000 population	800m
Children’s play space: formal equipped play	0.15 ha per 1,000 population (aged 19 and under)  1.5sqm per person (aged 19 or under)	Doorstep (100m) Local (400m) Neighbourhood (800m) Other play (1km)
Playing pitches	2.43 ha per 1,000 residents	

## DEVELOPMENT MANAGEMENT POLICY

# CL6: PROTECTING AND ATTRACTING PUBLIC HOUSES

### Protecting public houses

1. Public houses will be protected for their important community, social and economic roles within local communities. There will be a presumption in favour of retaining public houses and bars in Enfield. Any proposals that involve the loss of a public house with heritage, social, economic, or cultural value to the community, including through change of use or redevelopment, will be refused unless they comply with London Plan policy HC7.
2. Proposals for the change of use will be supported if there is robust evidence demonstrating the following:
  - Legitimate efforts have been made to preserve the facility as a public house. This includes evidence of regular maintenance, good management practices, and business diversification;
  - The public house is not financially viable, and there is no reasonable prospect of the premises remaining in its current use or an alternative community use in the foreseeable future. This should be evidenced through attempts at different business models, management approaches, and active marketing exercises at an appropriate market rate (relative to the type and location of the public house) over a minimum continuous period of three-years; and
  - All feasible options to re-provide the public house have been investigated and sufficient justification is provided where these are not considered. The redevelopment must offer sufficient community benefit that outweigh the loss of the existing facility; and new or replacement facilities should meet an identified need in locations easily accessible to the local community.
3. Proposals affecting a public house, including its operational and ancillary amenity space, will be refused unless there is robust evidence demonstrating that the viability of the public house and its current and future operation will not be compromised, and development will not detract from the appearance and character of the building, including any features of historic or cultural significance.
4. Proposals involving the replacement or re-provision of a public house must ensure that the replacement facility is of comparable character and quality as the existing public house and has an appropriate amount and configuration of floorspace to enable the continued viability of the public house.
5. Where the change of use of a public house is considered acceptable, development proposals will be expected to retain the building and other associated features where these make a positive contribution to local character, including their historic, streetscape and townscape value.
6. Proposals involving new public houses will be encouraged within town centre locations and other accessible areas as part of wider strategies to promote the evening economy and attract a more diverse range of town centre uses, taking account of agent of change principles.



## EXPLANATION

- 12.36 Public houses play an important role at the heart of many local communities in Enfield. They act as social hubs offering a welcoming environment for people of all backgrounds to socialise and interact. Many pubs are heritage assets and make a positive contribution to the historical development of the townscape and identity of places. Pubs are more than just a place to drink - they can host cultural events, clubs, and provide informal meeting spaces for local interest groups, and thus contribute to people's sense of place and belonging. They are also particularly vital to the visitor and evening and night-time economy in Enfield.
- 12.37 In recent years, like many other London Boroughs, Enfield has lost a significant number of public houses and bars. This policy will therefore seek to prevent the loss of these important community and cultural facilities. Particular consideration will be given to the need to protect historic pubs (built in the 20th century or earlier), especially where these are landmark features in the townscape.
- 12.38 However, exceptions will be made where the site is vacant and has become surplus to requirements; the existing use is no longer viable; there is no loss of public house provision (e.g. the public house can be relocated as part of a wider redevelopment) and the proposed development does not have any significant cumulative impacts. In the case of changes of use, existing features

of architectural and heritage value in the public should be retained as part of any redevelopment.

- 12.39 As part of any proposal involving the demolition or loss of an existing public house, including a change of use, the Council will expect to see full details of patronage levels and trading accounts over the past three years, including accounts from previous management where appropriate. In addition, applicants must provide a statement outlining the steps taken by the owner or operator to respond to viability concerns. This might cover considerations given to business diversification (for example, expanding the food and drink offer), promotions or building refurbishment. Finally, proposals will need to provide proof of a marketing exercise covering a minimum continuous period of three years, including details of commercial agents, advertisements and lease terms offered. During this time the pub must be actively marketing at a reasonable local market rent. The Council will consider whether any ties or restrictive covenants have affected interest.
- 12.40 Public houses require dedicated operational spaces. They also feature function rooms and/or ancillary amenity space, including outdoor gardens, which are critical to supporting their role as places of gathering and community facilities. Where proposals involve a reduction or reconfiguration of operational and ancillary spaces, it must be demonstrated that this will not have a detrimental impact on the financial viability

of the public house. Furthermore, proposals must show that the remaining space will be of a sufficient amount and quality to continue to meet the needs of pub users.

- 12.41 Operational and ancillary spaces include, but are not necessarily limited to, beer gardens, function rooms, kitchens, cellars and accommodation integrated into the building (often used by staff as resting space).
- 12.42 Where sites are redeveloped, including through comprehensive redevelopment, our priority is to protect pubs particularly where they are of historic, cultural or community interest. However, in certain circumstances it may be acceptable that a facility is replaced or re-provided.
- 12.43 Proposals will be required to demonstrate that they have considered all reasonable options for retaining the pub in situ. Where this is not possible, the replacement provision must be designed to a sufficient quality and standard to ensure the continued viability of the pub.
- 12.44 The policy ensures that any development proposals that would result in the loss of a public house must be subject to an assessment of both existing use and the need for and value of the facility to the community. Where there is evidence that existing provision is not able to meet needs, we will work with partners to seek and where possible, enable new facilities.



# 13 Movement and Connectivity

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# INTRODUCTION

13.1 Appropriate transport infrastructure is fundamental to development in Enfield, to support growth, relieve pressure on Enfield's transport network and reduce the impact of travel whilst maintaining freedom and ability to move at will. Transport profoundly impacts the lives of our residents. Often, individuals face choices when it comes to transport, including whether to walk, cycle, use public transport, or use a private car. However, these choices may be limited by various factors such as travel conditions, personal preferences, inadequate investments or other local circumstances. Transport is not only a driver and a maker of economic development but also acts as catalyst, connecting individuals and communities, facilitating access to job opportunities and enabling businesses to connect to goods and markets, both within London and the wider sub-regional marketplace.

13.2 Enfield is committed to meeting the Mayor of London's Transport Strategy objectives, aimed at creating a transport network that improves the health and wellbeing of all Londoners. London is committed to achieving an 80% mode share for active and sustainable travel by 2041, with the additional goal to have zero road deaths by the same year. To achieve these targets, a

significant shift towards walking, cycling and public transport use is needed over the next 20 years. Development will be expected to contribute to these aims by enhancing local active and public transport networks, as well as minimising the need to travel through good design and location.

13.3 The policy objectives contained in the ELP align with those found in Enfield's Transport Strategy published alongside it. More detail on transport policies can be found in the Transport Strategy. These policies also form part of the Borough's response to the climate emergency, serving as a means to significantly reduce greenhouse gas emissions and address issues related to poor air quality and noise pollution.



Cycle Enfield opening of Edmonton Green cycle hub



## STRATEGIC POLICY

# T1: A SUSTAINABLE AND DECARBONISED TRANSPORT SYSTEM

### Part 1: Ensuring access to a fully connected sustainable transport network

1. New and planned transport investment will be required to support the levels of planned transport growth within the Borough over the plan period, as well as significantly increase the proportion of journeys via walking, cycling and public transport.
2. New development will safeguard existing land and buildings where necessary to facilitate active travel (walking and cycling), public transport or related support functions and future access to future infrastructure projects including the line of the potential Crossrail 2 route;
3. Development will be expected to deliver improvements to the sustainable transport network, promote sustainable modes of travel, reduce severance and barriers to sustainable modes and improve road safety. Planning applications should include Construction Logistics Plans, Travel Plans and Delivery Service Plans to detail how the impact of road based transport will be mitigated and maximising the use of sustainable modes.
4. Development should actively seek to reduce traffic where possible, particularly on residential roads and promote the safety of the transport network.

5. The Council will promote the sustainable movement of goods and materials while minimising their movement of goods and materials by road, by:
  - a. encouraging the use of canal, rail and bicycle transport, where possible;
  - b. protecting existing facilities for waterborne and rail freight traffic; and
  - c. promoting the provision and use of freight consolidation facilities.
6. Developments likely to generate significant movement of goods or materials by road both during construction and operation, will be expected to:
  - a. prioritise the use of Transport for London Road Network or other major roads to minimise the impact of freight movement
  - b. provide accommodation for goods vehicles on site
  - c. submit Construction Management Plans, Delivery and Servicing Management Plans and Transport Assessments where appropriate, while contributing towards their subsequent monitoring.

### Part 2: Increasing all active travel opportunities

#### Walking

7. Walking is an important mode of travel for short journeys. Developments should promote walking and active travel in the Borough by improving the pedestrian environment, this includes:
  - a. safely connecting to the existing pedestrian network
  - b. enhancing the pedestrian environment by providing high quality footpaths and pavements meeting the prescribed width guidelines for the expected number of people, contributing to a high quality public realm
  - c. making improvements to the pedestrian environment by including the provision of safe road crossings, seating areas, signage and landscaping that facilitate safe and pleasant walking experiences, ensuring permeability and adequate lighting
  - d. Assisting individuals with mobility impairments and supporting vulnerable road users where appropriate
  - e. Contributing to the establishment of bridges and water crossings where appropriate.



## Cycling

- a. Developments should promote cycling in the Borough and ensure a safe and accessible environment for cyclists, complying to the appropriate guidance, such as LTN 1/20 or its successor. This includes:
  - a. safely connecting to the existing cycle network. All developments should be situated within 400 metres of a safe cycle route, as per the MTS target, or provide new cycle connections to the network.
  - b. providing for or making contributions towards connected, high quality, convenient and safe cycle routes within and beyond the development site, in line or exceeding LTN 1/20. These routes should be permeable and well lit, incorporating green chains and links as set out on the Policies Map.
  - c. providing accessible, secure cycle parking facilities, as outlined within the London Plan. Cycle parking should be secure, well-lit, clearly sign-posted, and situated in convenient locations, including proximity to stations, main entrances and public spaces. Provision should also be made for visitors and hire bikes/ scooters within the development. In areas well-served by cycling infrastructure, higher levels of provision may also be required, considering the size and location of the development.

- d. providing high quality facilities that promote cycling, including changing rooms, showers, dryers and lockers.
- e. contributing towards the establishment of bridges and water crossings for cycle use where appropriate.

## Public Transport is a viable option for everyone

9. Development should provide public transport infrastructure to safeguard and promote the provision of public transport in the Borough by:
  - a. contributing towards improvements to bus network infrastructure, including improved access to bus stops, shelters, passenger seating, waiting areas, signage, and timetable information; and
  - b. improving accessibility to public transport through improved interchange between different modes of transport, such as the provision of safe and secure cycle parking at stations, along with ensuring step-free access.
10. Development should contribute to safeguard and promote the provision of public transport in the Borough by:
  - a. contributing to the delivery of improved and new public transport services where development is proposed in areas of low public transport accessibility, particularly in rural areas;

- b. Supporting the delivery of improved and new public transport services in areas where the demand generated by the development is likely to exceed existing capacity of bus services; and
- c. in major developments, contributions may also be sought towards the improvement of other forms of public transport, where appropriate. This includes:
  - i. the implementation of four-tracking of the West Anglia mainline (between Tottenham Hale and Broxbourne) to increase the frequency of train services to eight trains per hour;
  - ii. upgrades to the Piccadilly Line;
  - iii. increasing the frequency of rail services to at least four trains an hour during peak hours and three trains an hour during off-peak hours on the Enfield Town/Cheshunt services to and from London Liverpool Street; and
  - iv. Safeguarding space to deliver future improvements to Bus, Underground, Overground and National Rail networks, including potential future routes like Crossrail 2.

## DEVELOPMENT MANAGEMENT POLICY

# T2: A HEALTHY AND CONNECTED ENFIELD

### Part 1: Active Travel and Mobility is part of a healthy lifestyle

1. Development will be expected to:
  - a. improve walking access and routes to local services, including schools and retail locations, by incorporating new safe, effective and efficient routes, networks and streets designed in accordance with regional and local guidance and standards. This includes adhering to the healthy streets' indicators set out in Transport for London's guidance.
  - b. actively promote road safety and contribute to creating safer cycling and pedestrian movement around town centres, transport nodes and quieter neighbourhoods. This includes implementing traffic-calming measures within residential areas and the wider pedestrian environment, where necessary.

### Part 2: Open spaces are green, multi-functional and accessible

2. Development will be expected to support the healthy streets approach by:

- a. prioritising measures that encourage a substantial shift from private car journeys to active transport modes, with a particular emphasis on increasing cycling and walking, especially but not limited to, journeys under 2 kilometres. This should also include enhancing access to public transport and creating high-quality public realm.
- b. creating or contributing to the creation of quieter neighbourhoods throughout the Borough, through the removal of road traffic and prioritising active travel measures over car journeys. Streets or other selected locations should also include new pedestrian crossings and 20 mph speed limits and zones, where appropriate, and where suitable require contributions towards creating well-connected, high quality, convenient and safe network of cycling and walking routes to local destinations.

### Part 3: Making transport choices which positively impact health and wellbeing

3. The Council will limit the availability of parking by:

- a. utilising the London Plan parking standards as the maximum permitted but may consider further reductions in car parking provision based on local considerations. This could include limiting on-site parking spaces designated for disabled people where necessary, and/or essential operational or servicing needs only
  - b. prohibiting the issue of on-street or on-site parking permits in connection with new developments, and use legal agreements to ensure that future occupants are aware that they are not entitled to on-street parking permits;
  - c. considering the redevelopment of existing car parks for alternative uses
  - d. resisting the development of boundary treatments and gardens to provide vehicle crossovers and on-site parking
  - e. strongly favouring off-street parking, loading and servicing solutions to ensure that development requirements do not create a barrier or introduce conflicts with active travel.
4. Complementary measures which reduce parking demand, such as car clubs, and supporting integrated and well-designed walking and cycling routes (giving support to any retrofitting proposals) will be supported.
  5. Provision of Electric Vehicle Charging Points should comply with the London Plan, with the possibility of seeking contributions towards on-street EVCPs.

## DEVELOPMENT MANAGEMENT POLICY

# T3: A VIBRANT AND SAFE ENFIELD FOR EVERYONE

### Part 1: Neighbourhoods are compact and mixed use

1. Developments that are well connected by public transport and have active travel opportunities should be designed as car-free or offer a very low level of parking provision which are appropriate to the proposed use of the development, in line with the standards set out within the London Plan.
2. Developments should have well-connected, high quality, convenient and safe active travel routes both within and extending beyond the development site. These routes should be easily navigable and safe, permeable and well lit.

### Part 2: Achieving 20 minute accessibility to destinations and services

3. A Transport Assessment should identify key local services, including shopping, education, healthcare, and greenspaces, within a 20-minute Active Travel Zone from the development site. The Transport Assessment should consider how these services will be accessible by walking and cycling, while also identifying any barriers and proposing potential mitigation measures.

4. Larger developments should contain all key local services to further reduce the need for travel on existing, often congested networks. It is expected that active and sustainable mode infrastructure and services should be in-situ prior to the occupation of these developments.
5. Developments should have minimal impact on existing transport networks, particularly residential neighbourhoods. Where Transport Assessments indicate the potential for additional traffic, appropriate mitigation measures will be actively sought.

### Part 3: Feeling of safety on the Borough's roads

6. Developments will be expected to:
  - a. be well-connected, high quality, convenient, effective, efficient and safe active travel routes within and beyond the development site, that are easy and safe to use (i.e. permeable and well lit)

- b. promote road safety and safer cycling and pedestrian movement around town centres and transport nodes and quieter neighbourhoods, and traffic-calming measures within residential areas and the wider pedestrian environment
- c. ensure safe connections to existing transport networks and making improvements to the pedestrian environment, including the provision of safe road crossings.



Cycle lane A105 guided rides

## EXPLANATION

- 13.4 To achieve equality of access to opportunities for Enfield's residents and facilitate growth in an effective, efficient and sustainable way, an effective, resilient and safe transport network is necessary. The integration of land use and transport is an important consideration, both at the strategic Borough-wide and when planning individual site levels. A fully connected sustainable transport system involves connecting multiple modes of transport. For example, integrating active travel with public transport provides an attractive alternative to using cars. By combining public transport up with active travel options, we can encourage people to use active travel as part of their first and last mile journeys. The provision of segregated bike lanes, bike route signage, safe and secure bike parking facilities, as well as office amenities like showers and changing facilities, along with bike rental schemes, can help to encourage more people to take the bike as part of their journey.
- 13.5 Enfield is not unusual among outer London boroughs for having a lower proportion of trips made by sustainable modes compared to inner London boroughs. However, approximately half of trips are shorter than two miles in length, a distance that could be covered on foot or by bicycle. Some residents may rely on cars for trips outside of

Greater London or to destinations in other parts of outer London that may be time consuming or challenging to make by sustainable modes. Additionally, almost one third of Enfield households (31%) had no cars or vans in 2021, with the highest proportion of households in the south and eastern parts of the Borough such as Edmonton Green, where 52.7% of households lacked access to a car or van. This means that we have to take a broad view of transport to ensure that is equitable for all.

### Active Travel

- 13.6 Increasing active travel, i.e. cycling and walking, can help tackle some of the most challenging issues we face as a Borough; improving air quality, combatting climate change, improving physical and mental health and wellbeing, addressing inequalities and tackling congestion on our roads. To achieve this, we need to tackle the main barriers by building better quality infrastructure, making streets better for everyone, and we need to make sure people feel safe and confident cycling from an early age as children who walk, cycle or scoot to school from an early age have more road sense and an improved ability to travel independently and safely.
- 13.7 The Council is committed to increasing cycling and walking. Through our

'Journeys and Places' programme, the Council is delivering schemes to support cycling and walking Borough-wide. The A10 and A406 are the two busiest roads and the two biggest physical barriers (particularly between the east and west) to cycling within the Borough. It is recognised that there is a heavy reliance on cars to make local trips and there are currently limited alternative travel options with lower density of public transport provision. Enfield is one of five Outer London boroughs identified as having the greatest number of potentially cyclable trips, with nearly 80% of car trips in Enfield considered as being of cyclable length.

- 13.8 The Council wants to develop a safe, connected, high quality active travel network. Developments will need to provide safe connections to this and where necessary, land will be safeguarded to assist in the provision of the network.

### Public Transport

- 13.9 Public transport options, such as trains and buses, have a significantly lower carbon footprint per passenger when compared to individual cars. Encouraging the use of public transport for longer journeys can lead to a collective reduction in carbon emissions, alleviation of traffic congestion, and an improvement to air quality. Moreover, investing in efficient public transport infrastructure to meet the needs of current and future residents not only enhances accessibility and reduces the reliance on private cars, but also fosters a sense of community.



13.10 However, there is an unequal distribution of transport resources in the Borough, particularly in relation to access to public transport and orbital movements. While the Borough has access to the various public transport networks such as the Piccadilly Line, Overground, National Rail, buses, and active travel networks, there are disparities in their availability.

13.11 Furthermore, although Crossrail 2 has the potential to unlock development opportunities in the eastern part of the Borough, the project is currently on pause. The Borough is actively working with key stakeholders including the GLA, TfL and Network Rail along with landowners and development industry partners to deliver new and improved transport infrastructure to support changing demands of residents, businesses and visitors. These improvements involve the safeguarding of land, sites, buildings, space and associated infrastructure required to facilitate the construction and safe operation of Enfield's future transport network.

### Road Safety and Healthy Streets

13.12 Everyone should benefit from safe and convenient access to public transport, local services, community facilities, education, training and employment opportunities. These aspects collectively contribute to making neighbourhoods

and streets in Enfield safer, greener and less polluted, more legible and accessible for all residents.

13.13 The healthy streets approach aims to bring about a significant step-change away from car usage to more sustainable transport modes such as walking, cycling and public transport. Developers are expected to use the indicators of the healthy streets approach set out in the Transport for London's healthy streets toolkit, to demonstrate how their scheme, including the main access points, will positively interface with the street and help improve the amenity of the area. Proposals should be prioritising the needs for pedestrians, cyclists and public transport over private vehicles. In some cases, financial contributions may be required to mitigate the impact of development on the surrounding streets. Implementing measures that prioritise safe pedestrian and cycling movements, as well as reducing the adverse effects of vehicles such as speed reduction, safer street designs, vehicle safety enhancements, and educational programs to promote safe behaviour, is crucial to achieving the Mayor of London's objectives for modal shift and zero targets vision.

13.14 The feeling of safety experienced by people when travelling on the Borough's roads and streets not only

safeguards their physical well-being but also significantly enhances their overall quality of life. A sense of safety encourages people to engage in active travel, such as walking and cycling, which leads to improved physical health. Furthermore, a safe environment fosters a vibrant and connected community, as residents are more inclined to interact and participate in local activities. In essence, creating safe roads and streets within the Borough is an essential requirement for promoting healthier and happier communities, enhancing economic vitality, and strengthening social cohesion.

13.15 High-quality public spaces play a fundamental role in the integrated approach to land use and transportation. By enhancing the public realm and creating well-connected, greener, and safer places and streets, we can encourage a higher proportion of trips via walking, cycling, and public transport. This, in turn, has the potential to generate improved health outcomes for the community.

### Reducing the Need to Travel

13.16 Vehicles like cars, vans, and lorries are significant contributors to air pollution, which leads to approximately 4,000 deaths in London every year. Additionally, carbon emissions from fossil fuels play a substantial role in climate change. In Enfield, 40% of carbon emissions are attributed to the movement of people

and goods, with three-quarters of these emissions stemming from road transport. Furthermore, air pollution disproportionately affects the most economically disadvantaged communities. Residents with lower incomes in London are more likely to reside in areas heavily impacted by air pollution, despite being less likely to own a car.

13.17 Maintaining current levels and the high proportion of journeys made by private vehicles is neither efficient nor sustainable. Enfield is faced with the challenge of transitioning from private vehicles to more sustainable transportation methods, such as cycling and walking. This challenge is further complicated by the existing network's constraints and the more spacious and less densely populated land use. Many of Enfield's streets are already heavily congested, and the road network has limited capacity to accommodate additional vehicles. In response, we aim to achieve a more efficient and effective utilisation of land and road space through the promotion of walking, cycling, and public transport.

13.18 This policy seeks to create places where essential daily services, such as work, shopping, education, healthcare, and leisure activities, are reachable within a 20-minute walk or bike ride from home. By bringing neighbourhoods closer

together, this approach reduces the reliance on cars, leading to improved air quality and decreased carbon emissions.

13.19 Mixed-use development fosters inclusive and interconnected communities where residents can access a wide range of services, including housing, dining options, services, cultural facilities, parks, and more. This connectivity also reduces the need for private vehicles, making public transport, walking, and cycling more attractive. By reducing the dependency on private vehicles, mixed-use development can flourish, providing spaces for parks and pathways that encourage community interactions that would be challenging to achieve in a car-dominated design.

### Parking, Deliveries and Servicing

13.20 Historically, substantial portions of road space have been designated for stationary vehicles. While this may have been deemed acceptable in the past, achieving the desired active travel networks requires a shift in this approach. Parked vehicles not only contribute to traffic congestion but can also create road safety hazards. Therefore, there are benefits for all modes of transportation if these parked vehicles are accommodated off-street. Simultaneously, it is acknowledged that parking provision can be a vital consideration for maintaining the

vibrancy of town centres and ensuring access to services, which development must also address. Limiting parking opportunities within the Borough can reduce car ownership and usage while enhancing the appeal of an area for local walking and cycling.

13.21 The number of vehicles registered to addresses in Enfield has exhibited a slight decline since 2016. However, the number of plug-in vehicles, including electric and plug-in hybrid vehicles, has increased twelve-fold between 2016 and 2021. While this increase is substantial, plug-in vehicles still constitute a relatively small proportion of the overall number of registered vehicles in the Borough.

13.22 Freight vehicles, owing to their size, have a more significant impact on transport emissions than cars. Reducing the volume of freight vehicles on the road or substantially mitigating their emissions should be considered a top priority. Roads deemed most suitable for use by freight vehicles include those in the Transport for London Road Network and others designated as Major Roads. Therefore, efforts should be made to route freight vehicles to minimise their use of local and residential roads. Additionally, opportunities for freight consolidation and cycle deliveries should be explored where feasible.

# 14 Environmental Protection

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# INTRODUCTION

14.1 Enfield Borough has high environmental quality in most areas, which needs protecting, while certain areas would benefit from environmental improvements. Therefore, protecting the environment involves actions such as maintaining or improving air quality, and minimising or reducing nuisance affecting human senses, such as noise and odour. These measures serve to protect health and safeguard the quality of residential amenity.

14.2 Although legislation exists to control emissions from polluting activities, the planning system has a complementary role in directing the location of developments that may give rise to environmental protection problems. These challenges can manifest themselves either directly from the development or indirectly such as through the potential traffic it generates.

14.3 This policy comprises two strands. Firstly, it ensures that new development proposals do not generate issues which unduly impact on the surrounding environment. Secondly, it ensures that these proposals are not the recipients of existing issues. Similarly, it is important that existing lawful uses do not become compromised by virtue of subsequent new development.

14.4 Environmental protection aligns with the objectives of the ELP, aiming to minimise impact of development on climate change and the environment while promoting environmental improvements. The Borough is committed to protecting existing environmental quality and, where possible reducing adverse effects on the local and natural environment resulting from changes in activities or new development.

## Agent of change principle

14.5 The 'Agent of Change Principle' encapsulates the idea that a person or business introducing a new land use is responsible for managing the impact of that change. This principle is embedded in the London Plan particularly Policy D13. For developers proposing residential development, it is vital to consider potential significant adverse effects on future occupiers of that development from any nearby source(s) of noise, such as pre-existing entertainment venues. In the event of identifying such potential significant adverse effects, developers will need to factor in suitable mitigation measures into their planning applications to avoid any significant adverse impacts on health and the quality of life for future occupiers.

14.6 The policy in this section of the plan applies to all forms of pollution including noise, vibration, light, odour, dust, as well as water and air pollution. Pollution can reduce the environmental quality of the Borough, amenity, and negatively affect human health and well-being. This policy aims to ensure that all forms of pollution are taken into consideration, controlled, and mitigated against as part of all developments.



## STRATEGIC POLICY

# ENV1: LOCAL ENVIRONMENTAL PROTECTION

New developments should actively contribute to the health and wellbeing of both existing and future occupiers by effectively mitigating the adverse negative impacts of noise and other pollution generating nuisances on the environment and on the quality of life of residents. This should be achieved by applying the following principles:

### 2. Noise and vibration

- a. Developments that have the potential to generate noise must demonstrate that measures will be implemented to mitigate the impacts on surrounding occupiers; and
- b. If the development involves a noise sensitive use or has the potential to generate noise, a noise assessment will be required as part of the planning application.

### 3. Light pollution

- a. Proposals that include flood lighting or external lighting must incorporate measures to mitigate the potential impacts arising from such lighting. Additionally, where appropriate, details must be provided to demonstrate that the use of external lighting is appropriate for its intended purpose; and
- b. Proposals must be designed to minimise the adverse impacts of light pollution on adjacent occupiers as well as on natural habitats, biodiversity and the ecology of watercourses.

### 4. Water Pollution

- a. New developments that have an adverse impact on water quality, which includes waterways, identified Source Protection Zones (SPZ) or Aquifers, resulting in an

unacceptable risk to the quality of the water catchment, groundwater or surface water will not be permitted; and

- b. Proposals should actively reduce the runoff of particulates and other forms of biological and chemical pollution into waterways through sustainable drainage techniques and pollution prevention methods, including the incorporation of oil interceptors.

### 5. Land contamination

- a. All development on land that is known or may be affected by contamination and/or instability must be accompanied by a detailed assessment to identify any potential risks. This assessment should include risks to both human health and the environment, and measures must be taken to adequately address these risks effectively, ensuring the safety of the development.

### 6. Waste and Hazardous Installations

- a. Risk assessments will be required to ensure that appropriate safeguards are incorporated as part of the development of hazardous installations, and proposals for waste facilities, to adequately mitigate their impact on amenity, air quality, noise and other relevant environmental considerations by fully enclosing the facility.

### 1. Air Quality

- a. All major developments will need to demonstrate that they are at least “air quality neutral”;
- b. Air quality assessments will be required of all major developments and developments in the Air Quality Focus Areas as identified in the Enfield Air Quality Action Plan; and
- c. Development proposals should incorporate on-site measures aimed at improving air quality. In cases where on-site solutions can be demonstrated as impractical or inappropriate, off-site measures to improve local air quality may be considered, provided they demonstrate equivalent air quality benefits.

## EXPLANATION

- 14.7 This policy is comprehensive in its scope, addressing all forms of pollution including noise, vibration, light, odour, dust, as well as water and air pollution. Pollution, in all its forms, has the potential to reduce the overall environmental quality of the Borough, disrupt the sense of amenity, and have adverse effects on the health and well-being of residents. Additionally, pollution can impact the local flora and fauna negatively. The primary objective of this policy is to ensure that all forms of pollution are thoroughly taken into account, effectively controlled and actively mitigated in the context of all developments.
- 14.8 The Environment Act 1995, Part IV, requires local authorities in the UK to assess air quality in their area and designate air quality management areas (AQMA's) if improvements are necessary. The National Planning Policy Framework (NPPF) provides detail how planning policy should interplay with local authority requirements, with specific emphasis on Air Quality Management Areas (AQMA's) and Clean Air Zones (paragraph 181). Specifically, planning policies should sustain and contribute towards compliance with relevant limit values or national objectives, whilst being consistent with the Local Air Quality Action Plan.

- 14.9 Air pollution levels in large parts of Enfield exceed the standards set by the European Union (EU) and World Health Organisation (WHO). DEFRA and the GLA have externally verified and accepted Enfield's air quality objectives. Existing concentrations of nitrogen dioxide and particulate matter (PM10) are of considerable concern and pose a significant threat to human health. Addressing air quality is a top environmental priority for Enfield, and the Council is committed to tackle poor air quality in an integrated way.
- 14.10 Development that aims to meet air quality neutral standards will be strongly supported, particularly in the case of larger scale developments, in line with the London Plan. Additionally, innovative design solutions, urban greening and other mitigation strategies will be actively encouraged to improve air quality in all developments. In accordance with the London Plan, air quality assessments will be required for major developments, developments associated with sensitive uses/receptors and where considerable demolition will occur.

- 14.11 Air quality assessments will also be required in instances where there will be a significant increase in vehicular traffic and the use of more polluting technologies, including the use of non-road mobile machinery (NRMM) in construction. These assessments aim to identify major sources of pollution, constraints placed on sites by poor air quality, suitable land uses for sites, and design strategies that could improve air quality. New development will be intelligently designed to minimise direct exposure to air pollution, and the plan will support on-site and off-site measures, provided they demonstrably contribute to achieving air quality improvements in line with the London Plan.

### Air Quality Management Areas (AQMA's)

- 14.12 To ensure effectiveness, the policy takes an evidence-based approach to determining geographical scope. Planning decisions will be informed by Enfield's Air Quality Management Area (AQMA) as designated by the London Plan. These AQMA's are areas which not only exceed air quality limits but are also locations with high human exposure to pollution. This approach is closely aligned with the principles outlined in Enfield's Air Quality Action Plan, ensuring a targeted and effective approach to addressing air quality concerns.

## Noise and Vibration

- 14.13 Noise is an inherent part of our daily surroundings, contributing to the character of different places. Its absence marks places of tranquillity while its presence in areas with mixed activities contributes to their vibrancy. Nonetheless, excessive noise levels can adversely affect the health and wellbeing, productivity, and overall quality of life for all Enfield residents. Given the existing mix of land uses and activities, and the need to make the most sustainable use of land, there is the potential for conflict between developments sensitive to noise and those generating noise.
- 14.14 In line with the Sustainable Design and Construction SPG in the London Plan, developments should seek to minimise the adverse impacts of noise. It is not advisable to place noise sensitive developments or land uses in close proximity to major sources of noise, such as roads, railways, or certain industrial facilities, unless effective mitigation measures are used to reduce noise levels.
- 14.15 Persistent and intermittent noises such as those made by industrial activities, transport, construction and congregations of people can undermine quality of life. In cases where a proposed development has the

potential to negatively impact on a noise sensitive development or where there is a proposal for a new noise sensitive development near major sources of noise, the Council will require a noise impact assessment to investigate noise levels and determine the effectiveness of mitigation measures. When assessing proposals, the Council will have regard to relevant noise exposure standards and internal noise standards which apply to particular uses. Regard will be had to the Mayor's Ambient Noise Strategy as a reference source for understanding noise and identifying best practice.

## Light pollution

- 14.16 Lighting can play a vital role in enhancing community safety, helping people find their way and allowing many commercial and recreational activities to be carried out in the evening. However, inappropriate or excessive lighting can cause great public nuisance and have a significant adverse effect on residential amenities or the character of the countryside. This policy seeks to prevent disruption caused by excessive brightness and light spillage while ensuring that other positive aspects associated with lighting, such as facilitating opportunity for evening activities and increasing the perception and feelings of safety and security, are realised.



Woodland Way



14.17 Other adverse impacts include use of unnecessary amounts of energy and in some cases detrimental impacts on road safety and wildlife. It can disrupt ecosystems of nocturnal species. It is essential to ensure that that lighting is only focused on its intended areas and does not spill over to affect its surroundings. Proposals involving floodlighting should consider Sport England's lighting guidance and apply the standards and recommendations outlined in the Institute of Lighting Engineers Guidance Notes for the Reduction of Obtrusive Light.

### Water Pollution

14.18 Water is a precious resource and it is essential that new development seeks to be efficient in using water, wherever possible to reduce consumption. Water pollution can affect the supply of water for leisure, industrial and agricultural uses and have a harmful impact upon riverside habitats. Water pollution can come from multiple sources and poses a threat to the natural environment. Addressing water pollution requires a collaborative effort multi-agencies. Sources of water pollution are varied, including issues like mis-connected plumbing, sewage overflows and pollutants arising from roadways. The Council will work with the Environment Agency and Thames Water to ensure their technical expertise

is considered where new development proposals pose a risk to water quality and to restrict development which may threaten the quality of either ground or surface water. Improving water quality aligns with a number of crucial objectives:

- it increases the potential for recreational activities in Enfield's water resources;
- it fosters a better quality environment for everyone and offers opportunities for enhancing biodiversity; and
- it contributes to maintaining a good quality supply of high-quality drinking water.

14.19 Where a Water Framework Directive (WFD) assessment is required, developers will need to demonstrate there is no adverse ecological impact on the ability of the waterbody to meet its WFD objectives.

14.20 Groundwater is a significant contributor in supplying our drinking water and supporting wetland ecosystems and surface water flows as part of the wider water cycle. Within the Borough, there are a number of source protection zones and aquifers. These areas involve groundwater storage or sensitive areas of groundwater extraction where the risk to groundwater quality should be carefully considered. This policy seeks to protect these areas. Maps

showing the locations of Source Protection Zones in Enfield can be found at: <https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs>

14.21 Activities involving de-watering should be avoided in Source Protection Zones. Developments should aim to steer high risk developments away from SPZ1. This includes proposals that have the potential to release hazardous substances into the ground, involve effluent discharge, or physically disturb an aquifer, such as petrol filling stations located in SPZ1.

14.22 Developers should take into account the Environment Agency's Approach to Groundwater Protection and Land Contamination Risk Management guidance (or any updated versions).

### Contaminated land

14.23 Within the Borough, especially in the Lee Valley, there are significant concentrations of industrial activities and infrastructure. Contamination may arise from human activities, and there may also be natural sources of contamination. While modern pollution control measures aim to prevent new contamination and reduce the impact of existing activities, there is still the potential for contaminated land from previous land uses.



14.24 Where contaminated sites are identified through the planning system, developers will be required to carry out detailed site investigations. This process should include a risk assessment, remediation and management strategies that consider:

- the existing contamination status of the land in question through source-pathway-receptor pollutant linkages and how these linkages are represented in a conceptual model.
- Whether the development proposed will create new connections, such as new pathways by which existing contaminants might reach existing or potential receptors, and whether it will introduce new vulnerable receptors; and
- what actions are necessary to break these connections, prevent new ones, address any unacceptable risks, and enable the safe development and future use of the site and neighbouring land.

14.25 The remediation standards should ensure that the site is suitable for its proposed use and that all unacceptable risks to various receptors, such as living organisms, ecological systems including fauna and flora, property, landscape, amenity, controlled surface water and groundwater, have been effectively addressed.

### Waste and hazardous installations

14.26 Due to many industrial estates within Enfield, many sites have been used for activities which may have contaminated the soil in ways that could potentially harm individuals exposed to these contaminants. Hazardous installations comprise a wide range of sites involving chemical processes, fuel and chemical storage, and pipelines. It is important to carefully consider any risks associated with new hazardous installations and developments within the vicinity of existing installations as part of the planning process.

14.27 To ensure that appropriate safety measures are integrated into development, risk assessments will be required. The Council will also take the opportunity to review previously granted planning consents for hazardous installations to ensure they reflect current conditions and the site's physical capabilities.

14.28 If the level of contamination requires remediation to safeguard future users or occupiers of the site, neighbouring land, or protect any buildings or services from the hazards, planning permission may be granted subject to conditions specifying the necessary measures to be carried out. Developers will also be required to notify the Council of any suspected contamination

encountered during redevelopment. Where development is proposed on contaminated land, particular attention should be paid to the requirements of the Building Regulations where they apply.

14.29 When assessing new waste-related development, it is important to consider the strategic framework established by the North London Waste Plan and the provisions the plan contains regarding individual development proposals. Applicants should also be aware that new waste activities and installations will require an Environmental Permit from the Environment Agency.



# 15 Delivering and Monitoring

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# INTRODUCTION

15.1 This chapter provides an overview of strategies and mechanisms for implementing the ELP to ensure that the development that is set out in this ELP is delivered. This chapter highlights the powers that Enfield has as Local Planning Authority to help deliver development and the Council's wider corporate objectives. As a Local Planning Authority determining planning applications, the Council will determine applications in accordance with policy set out in this ELP unless material considerations indicate otherwise. Supplementary Planning Documents/ Plans and other relevant guidance, such as Opportunity Area Planning Frameworks and relevant guidance from the Mayor of London or any successor documents for further guidance will be used to assess planning applications. The Council will make use of various tools, such as planning performance agreements, design reviews and sustainability checklists, to improve the quality and the design of new development.

15.2 In addition, this section outlines the use of special legislative tools such as article 4 directions and highway orders, designed to protect the character and appearance of the Borough's built and natural environment. This section also explains the Council's strategies, including:

- allocating funds generated from development to contribute to the provision of supporting infrastructure and services aimed at mitigating the effects of new development;
- facilitating the timely delivery of sites and associated infrastructure in a well-coordinated manner, including appropriate phasing, masterplanning, and implementation;
- maximising the supply of new housing, services and employment opportunities in line with the spatial strategy set out in chapter 2; and
- establishing a monitoring framework to oversee the implementation of the policies set out in this plan and outlining the triggers that will instigate a review of the ELP.



Alma Estate Regeneration

## STRATEGIC POLICY

# D1 : SECURING CONTRIBUTIONS TO MITIGATE THE IMPACT OF DEVELOPMENT

1. Where appropriate, new development proposals are required to:
  - a. pay contributions through the Enfield Community Infrastructure Levy (CIL), based on the prevailing rates set out in the latest charging schedule. These contributions will be directed to support the delivery of the Borough's infrastructure, based on the spending priorities set out in the Infrastructure Delivery Plan (IDP);
  - b. pay additional contributions through the Mayor of London's Community Infrastructure Levy (MCIL) to fund strategically important transport infrastructure, including but not limited to Crossrail and other strategic infrastructure;
  - c. pay any contributions required under the proposed infrastructure levy; and
  - d. for site specific requirements, enter into planning obligations, where compliant with CIL regulation 122 (or any future regulatory standard) ensuring that such obligations are:
    - necessary to make the development acceptable in planning terms;

- directly related to the development; and
- fairly and reasonably related in terms of its scale and kind to the development.

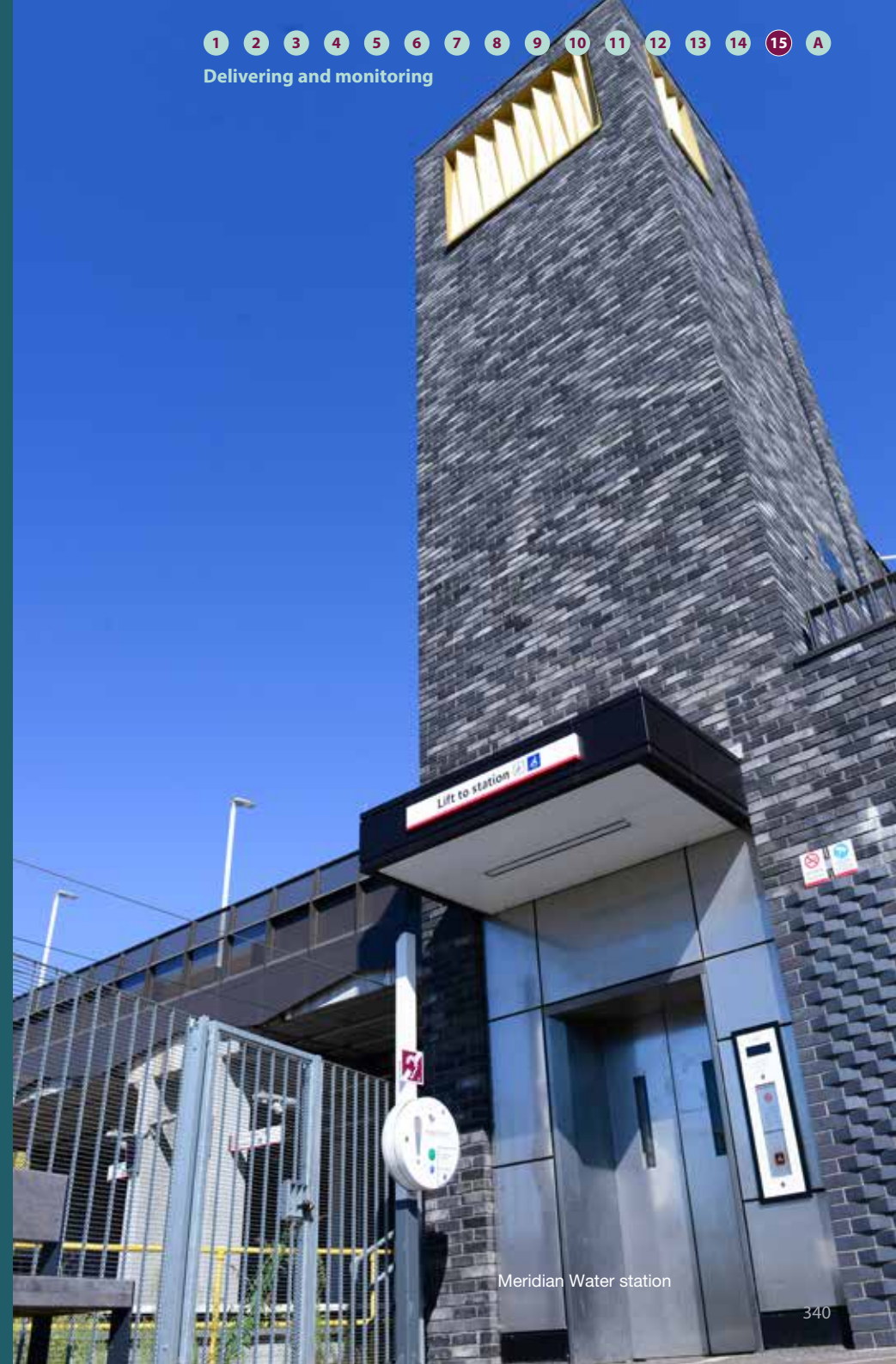
Following the assessment of need as set out in the Infrastructure Delivery Plan and subject to viability, priorities of such contributions are as follows:

**Figure 15.1:** Infrastructure priorities

<b>Key priority</b>	Affordable housing and specialised housing needed to meet acute housing need.
<b>Other priorities</b>	<p>Tackling climate change;</p> <p>Parks and open spaces (in particular Registered Parks and Gardens;, access to the countryside and Greenways)</p> <p>Air quality</p> <p>Biodiversity net gain</p> <p>School and childcare places, and other essential community facilities;</p> <p>Public transport, active travel, safety improvements and residual highway improvements to maintain and create healthy streets;</p> <p>Health facilities and services;</p> <p>Training, skills and job brokerage;</p> <p>Cultural facilities;</p> <p>Heritage at risk; and</p> <p>Other site-specific mitigation (e.g. sustainable drainage systems).</p>



2. Development will be required to meet all of the relevant policies and infrastructure requirements set out in the Local Plan in a timely fashion, unless it can be clearly demonstrated that S106 contributions would result in rendering the development unviable. In such instances, all available options including flexible trigger points or phased payment of contributions will be thoroughly explored to address the viability gap.
3. Development will be expected to provide or deliver on-site infrastructure provisions to meet the demands it generates. In cases where this is evidenced as not possible, often due to viability concerns or limitations in land availability, contributions will be sought to support off-site infrastructure provision.
4. Where appropriate, mechanisms for review will be put in place to defer or amend planning contributions, including in-kind provisions, at agreed trigger points, in the event that market conditions improve over the lifetime of the development or if sales values are higher than anticipated, especially in the context of multi-phased sites.
5. Planning applications will be refused in situations where nil or reduced contributions would render the development unacceptable in planning terms, even after considering alternative funding sources. This includes where planning obligations are not concluded in a timely manner usually within three years from resolution to grant consent.



Meridian Water station

## EXPLANATION

- 15.3 This policy seeks to secure planning obligations including contributions from new development, which will help fund improvements to infrastructure and service provision as well as maximise the benefits and opportunities arising from Enfield's growth, while mitigating the impacts associated with development or compensating for its potential effects to make them acceptable in planning terms. These developer obligations and contributions are necessary where existing and planned provision of infrastructure, facilities and services are inadequate to meet the needs generated by a proposal to ensure that sufficient infrastructure and key services are provided in a timely and efficient manner to meet the needs arising from new development and to ensure development is 'acceptable' in planning terms by mitigation against the impacts associated with development proposals.
- 15.4 Planning obligations will only be sought where it is not possible to deal with the matter through the imposition of a condition attached to a planning permission.

- 15.5 In Enfield, there are two main types of contribution: the Community Infrastructure Levy (CIL) and planning obligations. The levy applies a standard charge to most new developments, specified in the charging schedule and will be used to fund infrastructure needed to support the future growth of the Borough. Planning obligations are used to address the impacts of development during the planning application process.
- 15.6 The majority of the funding generated from developer contributions will be used to fund the delivery of projects identified through the Infrastructure Delivery Plan (IDP). Each year, we will publish an Infrastructure Funding Statement (IFS) setting out how much CIL and S106 income has been collected, how it has been spent and future spending priorities in line with the IDP.
- 15.7 The Borough will update the Developer Contributions Supplementary Planning Document (SPD) to provide detailed guidance on how this policy should be implemented. Where appropriate, we will pool contributions from planning obligations and CIL to facilitate the delivery of necessary infrastructure, alongside other sources of funding.

- 15.8 This policy also aims to maximise contributions from development towards the delivery of affordable housing and infrastructure, based on the policy thresholds set out in this plan. Developers will be expected to assess the quality and capacity of existing infrastructure in partnership with relevant providers and service delivery stakeholders and contribute towards the timely provision of improvements and/or additional capacity to meet the demands arising from new development. Appendix E of the ELP sets out the thresholds to calculate planning obligations through new development, in line with the priorities set out above.



Woodland Way





15.9 NPPF highlights that where up to date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment. In exceptional cases, a shortfall of contributions towards the provision of infrastructure or affordable housing may be justified on viability grounds, such as significant changes in land and property values since the adoption of the ELP. In such circumstances, applicants will need to provide clear and robust evidence through a detailed financial viability appraisal from suitably-qualified experts (as identified in our preferred list of consultants) justifying any deviation from the policies set out in this plan. The viability appraisal must also be independently tested at the applicant's expense<sup>82</sup>.

15.10 Viability assessments will be tested on a case-by-case basis and will need to demonstrate that:

- the policy requirements set out in the ELP such as on-site affordable housing would render the development unviable due to unforeseen circumstances;
- the wider benefits of the scheme would outweigh the loss of contributions; and

- the potential opportunities for deferring, reducing or phasing contributions have been fully explored.

15.11 The Council's strategy is to optimise the use of existing infrastructure to reduce demand and to seek new infrastructure where required. The loss of existing facilities will be resisted, and land will be safeguarded for the provision of future infrastructure requirements, where necessary. A coordinated approach to infrastructure management and investment through partnership working with key infrastructure providers will be required. In cases where a departure from the policy requirements set out in the plan can be justified on viability grounds, an appropriate review mechanism (i.e. a reappraisal of financial viability) will be incorporated within the Section 106 agreement to capture any uplift in the value of the land that occurs between the granting of planning permission and the completion of the development. Further details on the S106 review process will be provided in the Developer Contributions SPD.

<sup>82</sup> Financial viability appraisals will also be made publicly available on Enfield's planning register (without redaction) along with the other documents supporting the planning application.

## Spatial Planning

- 15.12 Spatial planning extends beyond the scope of land use planning. Its overarching goal is to create sustainable communities by ensuring development policies are integrated with other policies and programmes that shape the nature and function of places. The pivotal role of infrastructure provision is therefore central to support the spatial vision and spatial strategy articulated in this plan.
- 15.13 Spatial planning is not limited to the activities of the Council. Fundamental to the delivery of the spatial strategy is the Council's ability to work with partners to deliver the spatial vision, with a particular emphasis on securing infrastructure delivery.
- 15.14 The Infrastructure Delivery Plan (IDP) that supports the ELP defines the categories of infrastructure as social and community amenities; health services, community and public services, highways and transport networks, utilities, and enhancements to open spaces and the environment, identifying them as crucial, essential or desirable. The IDP provides detailed schedules and a strategic view of the necessary infrastructure needed for supporting the implementation of the ELP. It also sets out the current capacity of existing infrastructure, the impacts of

development on that infrastructure, and the likely sources of funding available to meet future needs. The IDP remains as a living document, subject to updates as new information becomes available to inform the delivery of infrastructure projects.

## Changes to the Contributions System

- 15.15 The Council has already implemented the Community Infrastructure Levy (CIL) since 1 April 2016 and the IDP is the evidence base for a potential review of the CIL. This review will ensure that all new developments make contributions towards the provision of new infrastructure.
- 15.16 New legislation will replace CIL with a new Infrastructure Levy (IL), prompting a period of transition. The policy framework and levy rates will undergo a review in response to further information on how the new system will operate. Nonetheless, the policy framework in this plan has been written to minimise disruptions during this transition. It anticipates that planning obligations will continue to play a significant role under the new approach, particularly for large developments and specific pieces of infrastructure, as permitted by this plan. Currently only Meridian Water is nil rated. However, this will need to be reviewed if new strategic sites are brought forward in the new ELP.

## Enforcement

- 15.17 The Council aims to ensure that development complies with appropriate national and local planning policy and guidance through effective enforcement. In cases where it is expedient and necessary, the Council will use its powers to take planning enforcement action to ensure that unacceptable development built without the requisite planning permissions, or in breach of planning conditions attached to a planning permission or other necessary consents, do not compromise the delivery of the objectives set out in this ELP. The Council has a proactive enforcement team that carries out a large number of investigations each year and takes legal action to ensure compliance with planning legislation as necessary. Additionally, the Council will apply conditions and secure planning obligations when granting planning permissions. These measures are taken to ensure that development is consistent with the policies set out in this plan, as well as the relevant national policies and legislation.



## DEVELOPMENT MANAGEMENT POLICY

### D2: MASTERPLANS AND DESIGN CODES TO ACHIEVE COMPREHENSIVE DEVELOPMENT

1. Proposals must be accompanied by a masterplan, which includes any relevant design code, if they form to an entire site allocation. The preference is for whole site masterplans. If whole site masterplans are not feasible or viable, the proposal should include evidence justifying the scope of the masterplan and should demonstrate consultation efforts made with stakeholders controlling other parts of the allocated site.
2. In cases where masterplanning only applies to a portion of the site, it must also demonstrate that the proposal will not prejudice future development of other parts of the site or adjoining land. It should not compromise the overall delivery of the entire site allocation and benefits sought for the wider area.
3. The site masterplan will be expected to set out how development will contribute to realising the local plan's vision and aligning to planning policies SS1 and SS2 as set out in Chapter 2
4. The site masterplan must be submitted when the principle of the development is established. When an outline planning application is submitted, it should ideally be accompanied by a full planning application for the first phase of the development. The masterplan will be required to include:
  - a. justification for masterplan's scope (as outlined in point 1 above);
  - b. an assessment of the site and its context to guide the overall development strategy;
  - c. a schematic site-wide masterplan that responds positively to the local plan's spatial strategy for the Borough, site specific development principles and guidelines, landscape considerations, and other relevant planning policies; and
  - d. a delivery strategy that identifies how the development will be implemented and managed over its lifetime. This includes land assembly and preparation, infrastructure requirements, development phasing and any necessary planning obligations or planning conditions. In cases where a masterplan is under multiple ownership or to be implemented by multiple developers, a planning application should be accompanied by a master developer agreement demonstrating how the masterplan will be implemented.
5. Applicants must demonstrate their appropriate engagement and consultation with the local community, relevant stakeholders, and those controlling other parts of the allocated site throughout the masterplanning and design coding process.
6. Outline schemes with multiple sites should be accompanied by design codes, following the principles of the National Model Design Code. These design codes should illustrate how good design and the principles of the masterplan will be achieved.

## EXPLANATION

15.18 The majority of site allocations are relatively large brownfield sites, which introduces complexity in terms of their redevelopment. These complexities may include situations such as multiple land ownership, fragmentation of existing uses and space, land remediation and need for new or upgraded infrastructure. We consider that these challenges are more likely to be overcome, and the optimal use of sites realised, where development follows a comprehensive approach, guided by a site-wide masterplan. In situations where a comprehensive approach is not achievable, evidence in the form of a statement that outlines any consultation undertaken with parties controlling other parts of the allocated site, and the outcomes reached, will be required.

15.19 To help ensure certainty of development outcomes, masterplans must be submitted when the principle of the development is established. In cases where schemes are subject to Environmental Impact Assessment (EIA), this should include parameter plans establishing the key parameters such as height, layout and open space. The masterplan should be informed by a baseline assessment of the site and its surroundings, drawing on the latest

available evidence. This may include demographic data, economic and social indicators, or information on the historical, natural and built environment. The site-wide masterplan itself should establish the overall approach to the function and form of development.

15.20 The level of detail included in the masterplan should be proportionate to the nature and scale of development proposed, as well as site specific requirements. Depending on individual circumstances at hand, various matters may need be addressed within the masterplan process. These matters include, but are not limited to:

- historical and cultural context;
- the types of land uses, the quantum of development and its distribution;
- building heights and massing;
- building typologies and identities;
- layout and design;
- matters relating to access, circulation and parking;
- open space and landscaping; and
- infrastructure considerations including transport networks, and community facilities.

15.21 The fundamental objective of the masterplan process is to ensure effective communication and collaboration between landowners and developers. This process also serves to raise awareness of the planning objectives for the site and the wider area among all parties involved. through coordination between landowners and other stakeholders, especially infrastructure providers, the Council will help to ensure that proposals do not prejudice each other, or hinder the wider development aspirations for the Borough. By promoting comprehensive planning and development through the masterplan process, we will help alleviate issues that may arise through fragmented, piecemeal development. Such comprehensive planning is more likely to maximise wider public benefits.

Meridian Water - 2019 DRP



## DEVELOPMENT MANAGEMENT POLICY

### D3: INFRASTRUCTURE AND PHASING

Planning applications should provide robust information on the expected phasing and delivery rates of the proposed development. This information should include the proposed timetable, infrastructure delivery and maintenance arrangements. It is incumbent upon applicants to demonstrate that sufficient infrastructure capacity exists or will be made available to support the development over its lifetime. This assessment should take into account existing infrastructure deficits as well as the needs it will generate, in line with the priorities and phasing requirements set out in the Infrastructure Delivery Plan.

#### EXPLANATION

15.22 Applicants will be expected to consult with relevant statutory and infrastructure providers at the early stages of the planning application process. This engagement is vital to demonstrate that the proposed development can be accommodated with the existing infrastructure capacity. It also helps in identifying any additional provisions required to meet the demands generated by the development, having regard to relevant evidence set out in pertinent strategies and the most up-to-date information available in the Infrastructure Delivery Plan (IDP).

15.23 Enfield's IDP identifies the different types of infrastructure that will be required to meet future growth needs of the Borough and outlines the strategies for their delivery and phasing to support new development. The IDP is a living document which will be updated on a regular basis as new information and evidence become available.

15.24 Site allocations will be the main mechanism for delivering infrastructure in the Borough. However, the long lead-in times associated with the delivery of infrastructure means that careful planning and phasing of site allocations to ensure the timely introduction of new development along with the required supporting infrastructure, particularly transport-related infrastructure.

15.25 In addition, it is essential to establish appropriate measures to be put in place to secure the ongoing maintenance and management of infrastructure and services within new development. In instances where it is appropriate, contributions will be sought towards on-going revenue costs associated with the physical upkeep and management of infrastructure assets linked to the proposed development. These assets may include publicly accessible open spaces, sustainable drainage systems, and highways. Planning applications will be expected to explain how this infrastructure will be maintained and managed over time.

15.26 Depending on the scale and nature of the proposed development, the developer has the option to either transfer the ownership and associated responsibility of this infrastructure to a public body such as the London Borough of Enfield or a third party organisation like a community-run trust. Alternatively, they may decide to maintain private ownership of the land and manage its upkeep for example through a property management company. Nevertheless, the authority reserves the right not to accept a transfer of ownership, in which case the developer would be required to retain ownership and assume responsibility for the management of this infrastructure. It is crucial that open spaces and community facilities, including health centres and cultural hubs remain accessible to the public and are maintained at an acceptable standard in perpetuity.

## DEVELOPMENT MANAGEMENT POLICY

### D4: MONITORING AND REVIEW

1. Monitoring is an important part of the continuous planning process. A set of key indicators and targets have been developed so that the effectiveness of policies in achieving the objective can be assessed. Where regular monitoring indicates a significant and persistent shortfall in the delivery of housing and employment targets as set out in part 2 of the plan, including in the types and sizes of homes and employment spaces indicated in the latest evidence base documents, the Council will implement an action plan to increase the supply of land and supporting infrastructure. This action plan will involve various measures including:
  - a. utilising council-owned land and relevant powers such as compulsory purchase orders and site acquisitions to assist in the delivery of sites and associated infrastructure including the direct provision of new housing and employment facilities;
  - b. securing additional funding from various sources such as the GLA, TfL and government bodies to facilitate the timely delivery of sites and associated infrastructure, with the aim of achieving higher densities than those projected in the housing trajectory, as set out in Authority Monitoring Report;
  - c. maintaining a register of suitable and deliverable sites, including small sites and self-build projects, to ensure a rolling five-year supply of housing on an annual basis;
  - d. exploring opportunities arising from development proposals to unlock housing and infrastructure delivery across the Borough, including the pooling of contributions and the identification of new projects through the Infrastructure Delivery Plan;
  - e. working with a range of partners and stakeholder to ensure sustainable growth and regeneration opportunities are fully explored, with a focus on optimising the use of previously developed land and new delivery approaches and area-based masterplans, particularly in opportunity areas and town centres; and
  - f. supporting various initiatives such as neighbourhood plans, town centre partnerships, business networks and business-led and other neighbourhood management schemes to promote centres, attract inward investment, and effectively co-ordinate and manage improvements to the public realm.



Bloqs, Meridian Water



## EXPLANATION

- 15.27 The ELP will cover a 22-year timeframe from 2019 to 2041. Plan reviews are required at least every five years to account for changing circumstances, such as shifts in market conditions, infrastructure deficiencies, updates or revisions to the London Plan, and the presence of unmet needs within wider housing and economic functional areas. The extent and timing of these reviews will depend on the extent to the effectiveness of the plan's policies.
- 15.28 In order to deliver the spatial vision and strategic objectives outlined in the ELP, the Council will monitor the implementation of policies, proposals and infrastructure projects on an annual basis. Key indicators are set out in the ELP's monitoring framework in Appendix E.
- 15.29 The ELP's progress will be continuously monitored through a framework of performance indicators and targets. In cases where the policies fall short of achieving the growth targets set out in Chapter 2, the Council will take appropriate actions to correct the situation. Some of the triggers that prompt a plan review include the persistent under delivery of housing and employment growth and the challenges in securing the timely provision of essential infrastructure.
- 15.30 Where evidence suggests that changes in land values are likely to impact significantly the viability of different types of development, we will consider the need to review the strategic approaches or policies within this plan to ensure they remain relevant and up to date. This is particularly pertinent to affordable housing and infrastructure requirements. For example, in scenarios where land values increase as a result of strategic infrastructure investment, the Council will seek to ensure that the maximum viable amount of genuinely affordable housing is secured on a site-by-site basis.
- 15.31 Where evidence suggests that changes in land values are likely to significantly impact on the viability of different types of development, we will consider the need to review the strategic approaches or policies set out in this plan to ensure they remain relevant and up to date. This is particularly in respect of affordable housing and infrastructure requirements. For example, where land values increase as a result of strategic infrastructure investment, the Council will seek to ensure that the maximum viable amount of genuinely affordable housing is secured on a site-by-site basis.