

Duty to Cooperate Statement

Enfield Local Plan

August 2024

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1. Introduction

Purpose of this statement

- 1.1 The Duty to Cooperate was introduced by the Localism Act 2011 and is set out in section 33A of the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities in England to engage constructively, actively and on an ongoing basis with prescribed bodies on the preparation of a Local Plan particularly to address strategic cross boundary matters. The Duty to Cooperate, as a legal test, has now been rescinded by the Levelling Up and Regeneration Act, which received Royal Assent on 26 October 2023. This has replaced the legal test with a soundness test (in national policy). This paper addresses both the former legal test and the current soundness test.
- 1.2 This report outlines how the London Borough of Enfield ('Enfield Council' or 'the Council') has prepared the Enfield Local Plan: Proposed Submission document (Regulation 19) in accordance with the Duty to Cooperate. It sets out how the Council has engaged with the prescribed bodies on relevant strategic and cross boundary matters. It should be read alongside accompanying Statement of Conformity.
- 1.3 This statement will be reviewed and updated as the Local Plan progresses through the plan process, eventually being published alongside the submission plan as an examination document. This will ensure that it reflects ongoing engagement and cooperation prior to the submission of the Local Plan to the Secretary of State. This may include coverage of new issues or agreements on strategic matters as well as further discussions with prescribed bodies. There is an intention to demonstrate continued engagement during and beyond the Regulation 19 consultation, noting that any further changes to the plan would be presented through proposed modifications ahead of examination.
- 1.4 Additionally, the Council has prepared a separate Local Plan Consultation Statement at the Regulation 18 stage of the plan process. The Consultation Statement details how the Council has undertaken public consultation during the plan-making process and how consultation responses have been used to inform the preparation of the Local Plan.

2. Legislative and policy context

Localism Act 2011

- 2.1 The Localism Act 2011 introduced the Duty to Cooperate by way of amendments to Section 33A of the Planning and Compulsory Purchase Act 2004. This requires that local authorities must cooperate with prescribed bodies to maximise the effectiveness of local plans. They must engage constructively, actively and on an ongoing basis on strategic matters.
- 2.2 For the purposes of the Duty to Cooperate, a strategic matter is defined as sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas.

Duty to Cooperate Bodies

- 2.3 The preparation of Local Plans is governed by the Town & Country Planning (Local Planning) (England) Regulations 2012 (as amended). The Regulations set out a list of prescribed bodies that the Duty to Co-operate applies to. Specifically, these are in relationship to Enfield:

Environment Agency

- Historic England
- Natural England
- Mayor of London (Greater London Authority (GLA))
- Civil Aviation Authority
- Homes and Communities Agency (now Homes England and Regulator of Social Housing)
- Each Primary Care Trust established under the National Health Service Act 2006 (Integrated Health Board, which have (in Enfield) replaced the Clinical Commissioning Group)
- National Health Service Commissioning Board
- Office of Rail Regulation (now Office of Rail and Road)
- Each integrated transport authority (Transport for London - TfL)
- Each highway authority (National Highways, TfL and LB Enfield)
- Each local enterprise partnership (LEP)
- Marine Management Organisation

3. Relationship with the London Plan

- 3.1 The Local Plan must be in general conformity with the London Plan, which is produced by the Mayor of London. The London Plan is the spatial development strategy for Greater London, ensuring a coordinated approach to spatial planning across all boroughs. The new London Plan was published and came into force on 2 March 2021.
- 3.2 Many of the strategic matters to be addressed through the Duty to Cooperate are, in London, a matter for the London Plan or are otherwise addressed through its preparation. This includes the spatial distribution of housing across London, provision for employment land and other commercial areas such as town centres, strategic green infrastructure (including open space). It also provides the framework for the delivery of strategic infrastructure (including transport, social infrastructure, waste management, utilities, and waterways), whilst recognising further details may be required in boroughs' Local Plans.
- 3.3 Extensive consultation has been undertaken with the Greater London authority (GLA) as evidenced within Appendix 1 of this Statement.

4. Demonstrating compliance with the Duty to Cooperate

- 4.1 This section sets out details of how the Council has fulfilled the Duty to Cooperate up to the current stage of the plan process. It provides an overview of the Council's relationships with the prescribed Duty to Cooperate bodies.
- 4.2 The National Planning Policy Framework (NPPF) (2023) sets out the Government's planning policies for England and how they should be applied. The NPPF includes policies on plan-making including the Duty to Cooperate. It is accompanied by the National Planning Practice Guidance (NPPG) which provides further information to support the implementation of the national policies.
- 4.3 NPPF paragraphs 24–27 emphasise the need for local planning authorities to maintain effective cooperation during the plan-making process. It provides that this is integral to the production of a sound plan, one that is positively prepared and with a justified strategy for managing growth and meeting identified needs for development, including infrastructure. Cooperation can help to inform considerations as to whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.
- 4.4 NPPF paragraph 27 highlights that statements of common ground should be prepared and maintained to support the plan-making and examination process. These can help to document the cross-boundary matters being addressed by the plan and assist progress in cooperating to address these.
- 4.5 Guidance on plan making states the issues that:

*The duty to cooperate applies in London, and other combined authority areas. Within these areas local planning authorities are required to cooperate with each other, county councils, other local planning authorities outside the combined authority area, and prescribed public bodies. The degree of cooperation needed between these parties will depend on the extent to which strategic matters have already been addressed in the spatial development strategy. Paragraph: 033
Reference ID: 61-033-20190315*

The level of co-operation is expected to be proportionate to the task and should not unduly delay the plan review. For example, an authority may set out how they

propose to review the policies in their plan and when and how neighbouring authorities and prescribed bodies will be engaged. A record of how authorities will be engaged in the review of plans and of where agreement has or hasn't been reached on the need to update a policy or policies can be set out in the Statement of Common Ground. Paragraph: 075 Reference ID: 61-075-20190723

- 4.6 The Council has taken a proportionate approach with relevant bodies on identifying and addressing strategic matters through the Duty to Cooperate, focussing on areas where the Local Plan will have significant influence in helping to deliver the London Plan.

Cooperation with the Mayor of London and the Greater London Authority group

- 4.7 Enfield Council works closely and in partnership with the Mayor of London and the Greater London Authority (GLA) group, which includes Transport for London (TfL). Partnership working is progressed across the Council's corporate service areas, including strategic planning and transport.
- 4.8 The Council has liaised extensively with the GLA group throughout preparation of the Local Plan. This is evidenced within Appendix 1 which sets out the Duty to Cooperate record. In addition to statutory public consultations (Regulation 18 stage) the Council has engaged with the GLA group in a variety of ways, including:
- early-stage review and officer-level feedback on the draft Local Plan;
 - joint commissioning and work on Local Plan evidence base documents; and
 - feasibility studies on transport infrastructure projects.
- 4.9 A short summary of some of the key engagement activities is set out below.
- **London Strategic Housing Land Availability Assessment (SHLAA) 2017** - The Council worked with the GLA on the preparation of the London SHLAA 2017. This is a key evidence base document informing the London Plan (2021) including the borough-level housing targets. As part of this, the Council participated in an extensive site screening and assessment exercise. Enfield's concerns (regarding long term delivery) were carried through to the EIP to the London Plan where they were largely accepted and were reflected in the adopted London Plan.
 - **Population projections** – The Council has liaised with GLA officers on the preparation of bespoke borough population projections, which are used to inform the preparation of the Local Plan and supporting evidence base documents, including the draft Infrastructure Delivery Plan. The data builds on the London-wide population projections to ensure consistency of approach on strategic planning matters.
- 4.10 The Council has liaised with the GLA group at appropriate points regarding specific placemaking areas including Crews Hill, Chase Park and Meridian Water, and continues to do so.
- 4.11 The local enterprise partnership for London and Enfield is the London Economic Action Partnership (LEAP). The Council is a member of LEAP through which the Mayor of London and Transport for London engage with London boroughs, business stakeholders to identify strategic issues and plan for economic development in London.

5. Relationship with other bodies

Cooperation with neighbouring authorities

- 5.1 The local enterprise partnership for London and Enfield is the London Economic Action Partnership (LEAP). The Council is a member of LEAP through which the Mayor of London and Transport for London engage with London boroughs, business stakeholders to identify strategic issues and plan for economic development in London.
- 5.2 Enfield is a member of **London Councils**, a non-partisan organisation that works on behalf London's 32 borough Councils and the City of London Corporation. London Councils acts as a focal point for representing borough interests, informed by the political and professional networks that it runs with the Government, the London Mayor, the wider GLA and London's public service. With respect to planning, London Councils facilitates the **Association of London Borough Planning Officers (ALBPO)**. Enfield Council planning officers regularly attend meetings of the **ALBPO Development Plans Committee and the ALBPO Policy Officers Sub-Group**.

Figure 1: Map of the 32 London Boroughs



- 5.3 An all-London boroughs **Neighbourhood Planning Group** has recently been established. This functions similarly to the ALBPO group and provides a network for information sharing and good practice. It is normally chaired and hosted by Camden Council. Enfield Council planning officers have attended meetings.
- 5.4 At the sub-regional level, Enfield is a member of the **Local London Partnership** of 9 eastern and north London boroughs including:
- Barking & Dagenham
 - Bexley
 - Bromley

- Greenwich
- Havering
- Newham
- Enfield
- Redbridge
- Waltham Forest

5.5 This partnership primarily focuses on managing former European regional development skills programmes not devolved to local government.

5.6 Enfield is also a member of the **North London Waste Planning Group** and comprises of the seven North London Boroughs of:

- Barnet
- Camden
- Enfield
- Hackney
- Haringey
- Islington
- Waltham

5.7 Enfield is also part of the **London Legacy Development Corporation area**, which has jointly prepared the Joint North London Waste Local plan (Adopted 2022), and forms part of the Development plan for Enfield.

5.8 Enfield also participates in the **London Waste Planning Forum (LWPF)**. The LWPF is a forum for local authorities and organisations focussed on planning for waste in London. For the local authorities, this is waste planning under their statutory responsibilities as planning authorities. This is distinct from their separate responsibilities for household waste collection and disposal. Waste planning authorities in London and across the wider Southeast, the Environment Agency, and GLA, London Waste and Recycling Board, London Councils and other London organisations dealing with waste are members of this forum.

5.9 The Forum provides a framework to support and coordinate waste planning in London. The Forum enables authorities to engage and cooperate on strategic waste matters that cross administrative boundaries. The LWPF makes collective responses to policy documents and the members of the Forum agree a consistent approach to waste planning, including the definition of strategic levels of waste movements for Statements of Common Ground.

6. Cooperation on Strategic Matters

6.1 This section of the Duty to Cooperate Statement sets out details of the key strategic matters and issues that have been discussed with prescribed bodies and other stakeholders during the preparation of the Local Plan. The section is organised by main policy topic area. Whilst it covers engagement from the start of the plan process, the section focusses on the progression of the Local Plan from the Regulation 18: Main Issues and Preferred Approaches document to the Regulation 19: Proposed Submission document.

Key Strategic Issues:

- Housing Need (including land availability)
- Employment
- Town Centres
- Strategic Transport
- Historic Environment
- Green Infrastructure and the Natural Environment
- Water Management
- Health and Social Care
- Education
- Sport and Recreation
- Waste Management

Housing need and availability

Key Duty to Cooperate bodies
<p>Prescribed</p> <ul style="list-style-type: none">• Greater London Authority• Homes England and Regulator of Social Housing <p>Other</p> <ul style="list-style-type: none">• Neighbouring London borough Councils• Neighbouring District Councils outside London
Areas for cooperation
Housing need and land availability

6.2 Enfield is part of the wider London housing market area, which has complex submarkets. Although the NPPF and PPG no longer refer to housing market areas specifically, based on migration data there is a reasonable level of self-containment in the housing market. However, Enfield cannot be defined as a self-contained housing market overall. In terms of travel to work, the borough is part of a wider functional economic area focused on central London and other neighbouring areas including Broxbourne.

- 6.3 The London Plan sets out borough-level housing targets and the overall spatial distribution and overall approach to meeting London's housing needs. Boroughs are directed to set out in their Local Plans including how, when and where new housing should be delivered along with details around mix and tenure.
- 6.4 The London Strategic Housing Land Availability Assessment (SHLAA) 2017 informed the housing targets set out in the London Plan (2021). The London Housing Needs Assessment treats Enfield as a single Housing Needs Area as it has over 80% containment. Enfield Council has prepared locally specific evidence on this matter – a Local Housing Needs Assessment (LHNA)¹ published in 2020, which provides a more focussed analysis of local area needs. The studies include a calculation of a 'Objectively Assessed Housing Need (OAHN) figure based on the methodology set out in national planning policy and guidance. The OAHN figure is significantly higher than the London Plan housing target for Enfield.
- 6.5 The study drew on four sources of capacity:
- planning approvals
 - site allocations
 - potential sites identified through the call for sites; and
 - GLA group studies and borough intelligence and small sites based on annual trends.
- 6.6 The Mayor of London has the responsibility of setting the housing targets for London's local authorities – the London Plan sets out a spatial development strategy in respect of the development and use of land in Greater London. However, the London Plan does not provide a clear answer to the 'critical issue' of how many homes Enfield needs to identify in its next 15-year plan period, as the London Plan only provides targets for Boroughs up to 2029.
- 6.7 Initial meetings were held with the Greater London Authority to discuss housing matters on 2 December 2019, 27 February 2020, and 10 February 2021. The Leader of Enfield Council wrote to Jules Pipe, Deputy Mayor for Planning and Housing, on 27 July 2021 requesting a strategic meeting to discuss DtC matters as part of the Regulation 18 Consultation which took place on 2 September 2021.
- 6.8 A further meeting was held on 5 August 2022 to discuss DtC matters. Throughout these discussions the GLA directed Enfield to base its housing target on an assessment as set out in paragraph 4.1.11 of the London Plan. The interpretation of this guidance has been discussed at length but there is disagreement around the precise operation of the guidance.
- 6.9 At Regulation 18 Stage in September 2021, the Greater London Authority (GLA) provided comments on Enfield's Draft Local Plan (Regulation 18). Enfield Council held a public consultation on the plan from 21 June 2021 to 13 September 2021. The GLA wrote that rolling the London Plan targets forward past 2029 was not in compliance with Paragraph 4.1.11 which specified a capacity-based approach. The GLA suggested that the plan should focus on the next 10 years of housing development, but national policy suggests plans should cover at least 15 years. Suggestions were also made around the year in which housing targets should be counted from: whether 2019 to align with the London Plan, or 2024 to align with National policy requirements.

¹ <https://www.enfield.gov.uk/services/planning/evidence-base#homes-for-all>

- 6.10 As a result of these comments LBE have re-appraised the plan's approach to Paragraph 4.1.11. Further meetings will be held to refine and review this approach prior to Submission of the plan.
- 6.11 Duty to Cooperate discussions with adjoining and neighbouring local authorities (including outside of London) focussed on whether these authority areas were able to accommodate Enfield's potential unmet housing need. Through meetings and formal representations to the Regulation 18 draft Local Plan, it was established that other authorities were not able to accommodate Enfield's unmet needs.
- 6.12 On 7 January 2021 Enfield Council wrote to neighbouring authorities and those adjacent to them as part of the Duty to Cooperate discussions including:
- Brent
 - East Herts
 - Epping Forest
 - Essex County Council
 - Hackney
 - Haringey
 - Harlow
 - Hertfordshire County Council
 - Hertsmere
 - Waltham Forest
 - Newham
 - Redbridge
 - Broxbourne
 - Barnet
 - Uttlesford
 - Welwyn Hatfield
- 6.13 This letter set out the land supply position at that time against London Plan targets, albeit these were not yet adopted, rolled forward over 15 years, which was 4,000 dwellings short of the requirement. The purpose of this letter was to formally ask if councils would be able to assist Enfield in meeting some or all of its unmet housing (and employment) requirements.
- 6.14 Twelve responses were received confirming that no unmet needs could be met in those authorities. Meetings were also held with Hertsmere and Uttlesford on 8 February 2021 and 10 February 2021 respectively. No responses were received from Epping Forest District council, or from Essex County Council and Hertfordshire County Council.
- 6.15 At Regulation 18 Stage, neighbouring authorities responded to the three housing target options consulted on in the plan, for 17,000 homes to 2039, for 25,000 homes in the same period, and for 55,000 new homes in the same period. There was broad support from developers and statutory consultees on the preferred option (25,000 homes). It was noted that the approach accords with the Government's objective to significantly boost the supply of homes as well as London Plan paragraph 4.1.11 in terms of setting housing requirements beyond 2029.
- 6.16 Most neighbouring authorities were supportive of the plan's preferred strategy seeking to provide 25,000 homes to 2039, by rolling forward the London Plan requirement to 2039. Welwyn Hatfield District Council raised concerns that rolling forward the London Plan requirement will result in an undersupply. Any undersupply would result in an

increase in London's growing backlog of unmet housing need. It would also drive increased levels of out-migration to surrounding areas. Welwyn Hatfield considers the Spatial Strategy should reflect the Enfield housing requirement in full by adopting the high growth option and is unlikely to be sound if it does not.

- 6.17 Since the Regulation 18 consultation on the draft Local Plan, the London Plan (2021) has been published and come into force. This provides certainty that the London Plan sets the strategic housing requirement for Enfield to 2029, which the Local Plan must address.

Housing Supply

- 6.18 Enfield's draft SHLAA methodology was consulted on in October 2020². A consultation statement summarising the responses received and the amendments made in response has been published³.
- 6.19 The HELAA 2023 refreshes and updates the HELAA published in 2021 and the SHLAA published (2020). It has been prepared from a base date of 1st April 2019, the beginning of the plan period, and runs to 31 March 2022. The HELAA was the starting point for the site selection process to identify suitable sites to allocate within the plan to meet the housing target.
- 6.20 The HELAA includes information collected in previous Call for Sites exercises from February 2019, March 2020 and February 2021 as well as the latest call for sites which ran from 15 June 2022 to 15 July 2022.
- 6.21 In response to the requirements of government policy and practice guidance contained within the NPPF and Planning Practice Guidance (PPG), the Council have developed a Site Selection Methodology⁴. Site allocations have been reviewed in line with council objectives and in line with the council's emerging Character of Growth study, prepared in consultation with Historic England.

Gypsies and Travellers

- 6.22 The National Planning Policy for Traveller Sites (published in 2015 and updated in December 2023), which sits alongside the NPPF, sets out the Government's aim to ensure fair and equal treatment for travellers in a way that facilitates their traditional and nomadic way of life of while respecting the interests of the settled community. It is noted in the most recent policy update that the definition of Gypsies and Travellers has been updated to include those that no longer travel. The London Plan (2021) requires the Local Plan to include a 10-year pitch target for permanent gypsy and traveller pitches, based on a needs assessment.
- 6.23 The Council has liaised with the GLA and neighbouring local authorities to update these bodies on its approach to addressing needs for gypsy and traveller accommodation.
- 6.24 No cross-boundary issues have been raised by neighbouring authorities with regards to pitch provision or unauthorised encampments. Other London boroughs have broadly welcomed Enfield's approach to meet its identified needs within the borough.

² https://www.enfield.gov.uk/data/assets/pdf_file/0017/4193/enfield-shlaa-methodology-2020-planning.pdf

³ <https://new.enfield.gov.uk/services/planning/evidencebase/No%20response%20was%20received%20from%20the%20GLA%20to%20this%20consultation>

⁴ https://www.enfield.gov.uk/data/assets/pdf_file/0024/25728/site-selection-methodology-Planning.pdf

- 6.25 The Council published the evidence of need within the Gypsy and Traveller Accommodation Need Assessment (GTANA) in 2020⁵. It identified a need for a minimum of 15 pitches by 2025 with a further 6 pitches by 2036. It does not identify a need for sites for Travelling Showpeople.
- 6.26 To support the delivery of the spatial strategy and to ensure that the identified needs are met in full, draft Enfield Local Plan Policy DM H10 commits to addressing the identified need through a separate Traveller Local Plan and provides a criteria-based policy for any transit or permanent sites coming forward, prior to the adoption of the Traveller Local Plan.
- 6.27 The Traveller Local Plan (issues and Options) was consulted on between September and November 2023. As part of that consultation, a Duty to Cooperate letter was sent out to all Neighbouring authorities to ascertain if Enfield's need could be met elsewhere. No positive confirmation was received. A call for sites exercise was also undertaken as part of this consultation, for which 2 sites were received⁶.
- 6.28 It is noted that the GLA has commissioned a combined Gypsy and Traveller Accommodation Needs Assessment to update the wider need for London. Enfield officers have been part of a steering group which meet regularly to discuss the assessment as it evolves, including contributing to the methodology as it evolves.

Employment

Key Duty to Cooperate bodies
<p>Prescribed</p> <ul style="list-style-type: none"> • Greater London Authority • Local Enterprise Partnership <p>Other</p> <ul style="list-style-type: none"> • FEMA London borough Councils • FEMA District Councils outside London
Areas for cooperation
<p>Industrial land management</p> <p>Strategic industrial Locations and Locally Significant Industrial Sites</p>

- 6.29 The NPPF and London Plan require local plans to set a clear vision and strategy to support economic development and growth. This includes parameters for the use of industrial land to meet local needs and generate inward investment. Enfield plays an integral role in the London economy as well as in the wider southeast and east of

⁵ https://www.enfield.gov.uk/_data/assets/pdf_file/0023/5684/enfield-gypsy-and-travellers-assessment-final-report-2020-planning.pdf

⁶ <https://www.enfield.gov.uk/services/planning/emerging-plans#traveller-local-plan>

England. Indeed, the London Plan identifies the crucial role of the Upper Lee Valley in enhancing strategic provision for logistics. The wider modelling for this region (FEMA) is covered in the Aecom (2020) FEMA study⁷, summarised in the Employment Topic Paper (2021)⁸. At Regulation 18 stage, Enfield's FEMA comprised the following authorities:

- Barnet
- Brent
- Broxbourne
- East Hertfordshire
- Epping Forest
- Haringey
- Harlow
- Hertsmere
- Newham
- Redbridge
- Uttlesford
- Waltham Forest
- Welwyn Hatfield

6.30 The FEMA study was consulted on in May 2020. Responses suggested minor changes which were actioned in the final draft. The GLA response found that *'The initial conclusions of the Report seem justified based on the presented analysis.'*

6.31 Enfield has an established employment land hierarchy with land that is safeguarded for commercial and industrial uses. It comprises London Plan designated Strategic Industrial Locations (SILs) along with locally designated Locally Significant Industrial Sites (LSIS), as well as some undesignated sites.

6.32 The Regulation 18 draft Local Plan set out the strategic approach to industrial land management in Enfield. It provided details as to how the Borough's future needs for industrial capacity and space would be met. This was informed by the Enfield Employment Land Review (2018)⁹, as well as the Enfield Intensification Study (2020)¹⁰, and the Enfield Industrial Intensification Market Deliverability Study (2020)¹¹. The Regulation 19 Local Plan now seeks to provide for identified employment needs through the intensification of existing sites, employment provision on new urban sites (in, for example, retail park use), and as a last resort the development of new sites within the Green Belt.

6.33 The key topic for discussion was Enfield's approach to meeting needs, and the scope for FEMA partners to meet this need. The Employment Topic Paper (2021) 'rolled on' the employment requirement set out in the Employment Land Review (2018) to reflect the plan period.

6.34 Duty to Cooperate discussions were held with adjoining and neighbouring local authorities (including outside of London) which comprised of authorities within the Enfield FEMA. Through meetings and formal representations to the Regulation 18 draft Local Plan, it was established that other authorities were not able to accommodate

⁷ https://www.enfield.gov.uk/data/assets/pdf_file/0018/3294/fema-study-2020-planning.pdf

⁸ https://www.enfield.gov.uk/data/assets/pdf_file/0020/11576/Enfield-Employment-Topic-Paper-2021-Planning.pdf

⁹ https://www.enfield.gov.uk/data/assets/pdf_file/0016/4921/enfield-employment-land-review-report-aecom-planning.pdf

¹⁰ https://www.enfield.gov.uk/data/assets/pdf_file/0022/5890/aecom-final-draft-enfield-industrial-intensification-report-2020-planning.pdf

¹¹ <https://www.enfield.gov.uk/services/planning/evidence-base#economy>

Enfield's unmet needs. Most were in a similar situation to Enfield in having significant housing and employment needs, alongside a deficiency of sites to accommodate employment requirements.

- 6.35 The 2020 FEMA study highlighted some, albeit limited, potential for Uttlesford and Newham to meet some of Enfield's employment needs. However, discussions were not fruitful. Newham indicated that they did not presently have significant 'industrial' capacity to assist other Boroughs by taking cross-boundary demand. Uttlesford highlighted their strategic position near Stansted airport and the need to use land to meet aviation needs and questioned the realistic potential of Uttlesford as an alternative location for Enfield-based businesses.
- 6.36 The GLA indicated, in their representation to the Reg 18 consultation, opposition to Green Belt release to meet employment needs. They also emphasised the need to take a '*optimistic and pragmatic*' approach to intensification.
- 6.37 Since Reg 18 consultation an updated employment evidence base has been prepared. This comprises a revised Employment Land Review and Market Assessment¹² (2023) which contains an updated 'need' figure, overview of supply, and recommendations for Enfield's FEMA.

Town Centres

Key Duty to Cooperate bodies
<p>Prescribed</p> <ul style="list-style-type: none"> • Greater London Authority • Local Enterprise Partnership <p>Other</p> <ul style="list-style-type: none"> • Neighbouring London borough Councils
Areas for cooperation
Approach to town centres

- 6.38 Both the NPPF and the London Plan make clear the need for local plans to establish a hierarchy and network of town centres, as well to set out approaches to secure their long-term vitality and viability. The London Plan classifies Metropolitan, Major and District town centres. Local Centres are designated by the Local Plan.
- 6.39 Enfield's town centre network and hierarchy were reviewed as part of the preparation of the new Local Plan. The Regulation 18 draft Local Plan proposed minor changes to the network, namely small alterations to Major and District town centre boundaries. The number and extent of Local centres remained unchanged.

¹² https://www.enfield.gov.uk/data/assets/pdf_file/0022/54751/Employment-land-review-2024-Planning.pdf

- 6.40 The town centre evidence base comprised the CPW Planning (2021)¹³ Town Centre Health Check and Boundary Review, and Lichfields (2021) Enfield Retail and Leisure Study Updated Needs Assessment. Key findings can be summarised as:
- Negative need for comparison floorspace up to 2040, but a positive demand for food/ beverage and convenience floorspace.
 - Enfield Town and the district centres perform well in terms of vacancy, with vacancy rates below the national average.
 - Footfall broadly recovered following the relaxation of Covid restrictions.
 - Small changes to the boundaries of the district centres to include existing town centre uses not designated.
 - The ‘impact assessment’ threshold was recommended to be lowered to 400 sqm.
- 6.41 The key discussions on Town Centres focused on Enfield’s broad approach in comparison to those of neighbouring local authorities. Enfield has adopted a ‘town centre first’ stance, underpinned by a sequential approach to development, in line with national and regional guidance, which is echoed by the approach taken by other London Borough authorities.
- 6.42 Detailed discussions were held with the London Borough of Haringey as part of the Meridian West SPD¹⁴ development. The authority stated that they would welcome continued engagement as detailed proposals for Meridian Water local centre develops. This to ensure that the new retail centre complements rather than competes with the surrounding district centres. The authority noted that the nearby retail centres in Tottenham and Northumberland Park are also planned to undergo significant investment and regeneration.

Strategic Transport

Key Duty to Cooperate bodies
<p>Prescribed</p> <ul style="list-style-type: none"> • Greater London Authority / Transport for London • National Highways • Office of Rail and Road • Civil Aviation Authority <p>Other</p> <ul style="list-style-type: none"> • Network Rail • Greater Anglia
Areas for cooperation
<p>Strategic transport network</p> <ul style="list-style-type: none"> • Strategic Transport Issues for strategic sites • Bus Services • Train Services • Walking and Cycling Infrastructure

¹³ <https://www.enfield.gov.uk/services/planning/evidence-base#town-centres-and-high-streets>

¹⁴ <https://www.enfield.gov.uk/services/planning/adopted-plans#meridian-west-supplementary-planning-document>

- Coordinated approach re cross boundary or close to boundary sites with other local authorities e.g. Junction 24.

- 6.43 The London Plan sets out the strategic framework for the provision of transport infrastructure necessary to support London's growth in a sustainable way. In general, it advocates for rebalancing the transport system towards walking, cycling and public transport. This will require sustained investment in public realm together with new and improved public transport services to ensure that alternatives to the car are accessible, affordable, and appealing, thus making it the preferred mode of travel.
- 6.44 The London Plan is supported by the London Mayor's Transport Strategy and Transport Assessment prepared to support the growth and development projections in the Local Plan is aligned to these.
- 6.45 Despite Enfield's connections to inner-London not all its areas are well connected or benefit from good access to public transport. There is no direct access to the Underground in Enfield.
- 6.46 The Council has worked closely with the Mayor of London and Greater London Authority group, including Transport for London, throughout all stages of the Local Plan preparation, as set out in Section 4 of this Duty to Cooperate Statement. This has helped to ensure agreement on the key strategic objectives and priorities for transport planning in Enfield. Furthermore, separate from the plan process, the Council has continued to work collaboratively with the GLA group to deliver new and improved transport infrastructure throughout the borough, including through the Council's Local Implementation Plan (LIP), which helps give effect to the London Mayor's Transport Strategy.
- 6.47 In addition, the Council has worked directly with TfL and Network rail to discuss emerging proposals in relation to the placemaking areas, Crews Hill and Chase Park. It followed an initial information pack (sent to several bodies including TfL and Network Rail). Follow up meetings were then set up to provide the opportunity to discuss the design of the schemes, and also likely next steps.
- 6.48 Coordinated approach re cross boundary or close to boundary sites with other local authorities has been undertaken e.g., Junction 24 of the M25.

Historic Environment

Key Duty to Cooperate bodies
<p>Prescribed</p> <ul style="list-style-type: none"> • Historic England • Greater London Authority <p>Other</p> <ul style="list-style-type: none"> • Neighbouring London borough Councils • Neighbouring District Councils
Areas for cooperation
Historic environment

- 6.49 The NPPF stipulates that Local Plans should set out a positive strategy for the conservation and enjoyment of the historic environment. The London Plan also recognises the importance of the historic environment and requires Local Plans to take a character-led approach to managing growth and development.
- 6.50 The Regulation 18 draft Local Plan recognised and sought to build on the distinctive character and identity of Enfield’s neighbourhoods and communities, including their historic character. The Regulation 19 plan is informed by the Enfield Characterisation Study, Conservation Area Appraisals and other evidence base documents. The draft Local Plan acknowledges the challenge of conserving and enhancing local character in the context of managing growth and meeting needs, such as for new housing.
- 6.51 During the plan-making process the Council has maintained dialogue with Historic England and the Greater London Archaeological Advisory Service (GLAAS), the latter of which is part of Historic England’s London and Southeast Regional Office. Officers from Historic England and GLAAS have provided comments on draft Local Plan proposals (either directly or indirectly) both informally between officers and through formal representations.

Green Infrastructure and the Natural Environment

Key Duty to Cooperate bodies
<p>Prescribed</p> <ul style="list-style-type: none">• Greater London Authority• Natural England• Environment Agency <p>Other</p> <ul style="list-style-type: none">• Neighbouring London borough Councils• Trees for Cities• Forestry Commission• Greenspace Information for Greater London (GiGL)• London Wildlife Trust
Areas for cooperation
Conserving and enhancing the Natural Environment

6.52 The NPPF and the London Plan set the strategic framework for conserving and enhancing the natural environment. They provide a direction for Local Plans to identify natural assets and provide further details on how these will be planned for and managed in an integrated way. The London Plan recognises the cross-boundary nature of the network of green infrastructure and its linkages across the region through the 'All London Green Grid' (ALGG). Although launched in 2011, this framework is regularly updated. The GLA group takes a leadership role in working with stakeholders to support the delivery of the ALGG. This includes London boroughs and other bodies such as:

- Forestry Commission
- Natural England
- Trees for Cities (environmental organisation)
- The London Wildlife Trust.

6.53 To support the preparation of the Local Plan the Council has completed several studies on green infrastructure, including assessments of open spaces and sites of importance for nature conservation¹⁵. These studies have been used to inform proposals for revised land-use designations and development management policies in the plan.

6.54 One of the key points of interest from the public, particularly local community groups, during the preparation of the Local Plan concerns the designation of open spaces and nature conservation sites. The Council has undertaken several assessments to inform the review of and updates to these designations, both prior to and following the Regulation 18 consultation on the draft Local Plan.

¹⁵ The studies and evidence base documents can be viewed here: <https://www.enfield.gov.uk/services/planning/evidence-base>

- 6.55 The Council has consulted and engaged with both Natural England and Environment Agency from the early stages of the Local Plan including on the Integrated Impact Assessment, which incorporates Strategic Environmental Assessment / Sustainability Appraisal and the Habitat Regulations Assessment. Representations from the Environment Agency on the Regulation 18 draft Local Plan provided that the plan could be strengthened by aligning more closely with the Environment Act 2021 and its provisions on Biodiversity Net Gain and Local Nature Recovery Networks. The Regulation 19 Local Plan has been amended to address this. Otherwise, Environment Agency feedback has largely focussed on water management issues.
- 6.56 The Natural England response to the Regulation 18 consultation on the draft Local Plan set out concerns around the impacts of additional population and vehicle movements on Epping Forest via recreational and air quality pathways. Since then, LBE has developed a Recreational Mitigation Strategy in consultation with Natural England and proposed a new policy BG3: Protecting Epping Forest Special Area reflecting this work that has since been agreed by Natural England. Further work is being carried out in consultation with Natural England to assess the traffic and air pollution effects of the plan and site allocations on Epping Forest.

Water Management

Key Duty to Cooperate bodies
<p>Prescribed</p> <ul style="list-style-type: none"> • Greater London Authority • Thames Water • Affinity Water • Environment Agency <p>Other</p> <ul style="list-style-type: none"> • Neighbouring London borough Councils
Areas for cooperation
<ul style="list-style-type: none"> • Flood risk management • Drinking and Waste Water

- 6.57 The NPPF sets out the framework to ensure that flood risk management is appropriately addressed through the plan-making and development management process. The London Plan acknowledges the multi-functional benefits of waterways and directs boroughs to plan positively for them through local plans.
- 6.58 The Council has made several amendments to the Regulation 18 draft Local Plan in response to formal representations made by the statutory consultees. This includes updates to the strategic approaches to managing waterways and flood risk as well as site specific development requirements and guidelines where there are localised flood risk issues, including river based, surface water or sewage flooding.

Health and Social Care

Key Duty to Cooperate bodies

Prescribed

- North Central London Integrated Care System (NCL ICS)

Other

- Neighbouring London borough Councils
- Neighbouring Districts outside Greater London

Areas for cooperation

- Health infrastructure planning
- GP Surgeries

6.59 The London Plan directs boroughs to work with Clinical Commissioning Groups (CCGs) and other health organisations to identify and plan for health care needs and facilities in their area. The London Plan refers to four broad types of health infrastructure:

- primary care
- community healthcare
- acute provision
- specialist provision.

6.60 Health and care services in the Borough are provided through:

- a network of local GP practices
- Enfield Community Care (NHS Trust)
- The Barnet (Enfield and Haringey NHS Mental Health Trust)
- The Royal Free London NHS Trust (which runs Chase Farm Hospital).

6.61 As set out in Section 4 of this report, the Council works in partnership with health care bodies across its corporate service areas, including with the London Healthy Urban Development Unit (HUDU) and North Central London Integrated Care System (NCL ICS), which supersedes the Enfield CCG. To inform the preparation of the Local Plan, the Council has maintained regular liaison with these bodies, particularly on updating the Infrastructure Delivery Plan. This has helped to ensure that work on the NHS Estates Strategy¹⁶ for primary and community healthcare facilities are reflected in the IDP, with further site-specific provisions included in the Local Plan.

6.62 The health care bodies have sought clarification around the projected levels of growth in Enfield and the spatial distribution of this throughout the Borough. This information is vital to informing the NHS Estate Management Strategy and service improvement strategies. The Council has engaged proactively with the Enfield Health bodies and London HUDU to provide the latest position on population growth and the emerging

¹⁶ <https://nclhealthandcare.org.uk/our-working-areas/estates/>

spatial strategy, both prior to and following the Regulation 18 consultation on the draft Local Plan. Feedback from the bodies has been used to inform the latest draft of the IDP.

- 6.63 The NHS representations on the Regulation 18 draft Local Plan were broadly supportive of the plan’s renewed emphasis on health and well-being. The need for Health Impact Assessments (HIA) to inform the development management process was flagged. The Regulation 19 Local Plan has been amended to include a new requirement on HIAs for certain types of development. A further request was made for the HUDU Planning Obligations Model to be used as a basis for negotiating planning contributions. This will be addressed in a future update to the Council’s Planning Obligations guidance.

Education

Key Duty to Cooperate bodies
<p>Prescribed</p> <ul style="list-style-type: none"> • The Department for Education <p>Other</p> <ul style="list-style-type: none"> • Neighbouring London borough Councils • Hertfordshire County Council
Areas for cooperation
Education infrastructure planning

- 6.64 Local authorities in England have a statutory duty to provide sufficient school places for pupils of statutory school age within their local authority area. The London Plan directs boroughs to identify and address local needs and any shortages in supply both locally and sub-regionally, and to identify sites for future provision, particularly in areas with significant planned growth.
- 6.65 The Council has prepared an Infrastructure Delivery Plan (IDP) which includes consideration of needs within the borough for childcare and education facilities. The IDP draws on the latest available information on demand for childcare and school place including future forecasting, along with the Council’s school place planning strategy. Forecasting is informed by Greater London Authority population projections. The IDP broadly shows that the future demands can be met within the borough, whilst recognising some infrastructure requirements will be needed to support this need for different types of provision.
- 6.66 Enfield like other London boroughs is working to address the requirements of children and young people under 25 years old with special education needs and disabilities (SEND). Demand for specialist school places in the borough is expected to increase over the short to medium term, which may lead to a need for placements outside the borough if no additional capacity is provided. It is noted that requirements for this type

of provision are often complex owing to the need for provision to be catered to the specific needs of children and young people.

6.67 At Duty to Cooperate meetings officers have acknowledged the complexities of school place planning in London. This is both in terms of modelling for future demand and recognising that children and young people in Enfield attend schools in other neighbouring boroughs and vice versa.

Sports and Recreation

Key Duty to Cooperate bodies
<p>Prescribed</p> <ul style="list-style-type: none"> • Greater London Authority • Natural England • NHS and Enfield Clinical Commissioning Group <p>Other</p> <ul style="list-style-type: none"> • Sport England
Areas for cooperation
Sport and recreation infrastructure planning

6.68 Sport and recreation facilities are important components of social or community infrastructure. Both the NPPF and the London Plan set requirements for local authorities to assess needs for sports and recreation facilities and plan positively to meet this need.

6.69 In 2018 the Council prepared a Playing Pitch Strategy which included an up-to-date assessment of supply and demand for playing pitches across the borough. The Strategy was prepared through engagement with Sport England.

6.70 Sport England submitted representations to Regulation 18 consultation on the draft Local Plan. The representations included objections to policy proposals concerning development affecting existing sports and recreation facilities, which Sport England considered to be contrary to the London Plan. There were concerns around the potential loss of facilities and related social infrastructure.

6.71 A Duty to Cooperate meeting was held after the Regulation 18 consultation. The meeting provided an opportunity for Sport England to discuss their concerns in greater detail and for officers to consider how these could be addressed as part of this ongoing feedback from Sport England. As a result the policy wording was altered further to Sport England's concerns.

Waste Management

Key Duty to Cooperate bodies
Prescribed <ul style="list-style-type: none">• Greater London Authority• Environment Agency• Neighbouring and other London borough Councils
Areas for cooperation
Waste management

6.72 The London Plan provides the strategic approach for London to achieve net waste self-sufficiency. It requires boroughs to demonstrate that they have made sufficient provision of land and facilities for waste management. Each borough is allocated an “apportionment” of waste, which represents the quantities of household, commercial and industrial waste they must manage.

6.73 The Council has and will continue to implement this approach to pool and manage the waste apportionment within its sub-region, working in partnership with other local authorities in North London. Further details on the group are set out in Section 3 above.

7. Statements of Common Ground

- 7.1 Alongside the Duty to Cooperate, the NPPF includes stipulations around the preparation of Statements of Common Ground to support the plan-making process. These statements are a written record of the progress made by strategic plan making authorities on strategic cross-boundary issues as they prepare Local Plans. They document where effective cooperation is taking place as plans are drawn up and taken through the statutory process to adoption. They also identify areas of agreement, and areas of disagreement (if such areas exist).
- 7.2 As a result of the ongoing Duty to Cooperate/Alignment Test meetings and correspondence detailed in the previous sections and in accordance with paragraph 27 of the NPPF, the Council anticipates producing Statements of Common Ground with neighbouring Local Planning Authorities as well as selected bodies. In addition, Statements of Common Ground will also be produced with selected landowners to demonstrate an understanding of areas of agreement including delivery rates.
- 7.3 When Statements of Common Ground are considered finalised and agreed they will be made publicly available as part of the Council's Local Plan examination library.

8. Next steps

- 8.1 This Duty to Cooperate Statement has set out how the Council has maintained ongoing engagement with prescribed Duty to Cooperate partners and other bodies during the preparation of Enfield Local Plan, up to the production of the Regulation 19 Local Plan: Proposed Submission document.
- 8.2 LBE will also produce a Duty to Cooperate Annex that will provide all the evidence to the Duty to Cooperate communication in a format that is helpful to the Inspector.
- 8.3 Statements of Common Ground are being prepared with prescribed bodies and other stakeholders, where considered necessary by the Council, to support the examination of the Local Plan. These will be published in due course as part of the library of evidence to underpin the Local as it proceeds through Examination.
- 8.4 The Council will continue to jointly work with other London Authorities and prescribed bodies to ensure that it's duty to cooperate is met.

Appendix 1: Duty to Cooperate Record

Authority / Body / Organisation	Reason(s) for DtC	Date of meetings: (need to re-draft into date order)
Local (Planning) Authorities		
LondoLondon Borough of Barnet	LB Barnet and Enfield- DtC matters	10.02.20
	Response to Barnet's reg-18 and update to Enfield's Local Plan	13.03.20
	DtC letter sent to authority to set out LBE land supply and to seek assistance to meet housing need.	07.01.21
	Transport matters (led by WSP)	13.04.21
	Update on respective boroughs' plans	28.07.21
	Request to agree Strategic Matters	28.07.21
	Transport matters (led by WSP)	09.09.21
	New Southgate area (regeneration) discussions.	10.11.22
	Transport maters (led by WSP)	06.07.23

Authority / Body / Organisation	Reason(s) for DtC	Date of meetings: (need to re-draft into date order)
	Transport matters (led by WSP)	12.09.23
	Local Plan progression meeting	25/04/24
	Infrastructure meeting	01/05/24
London Borough of Brent	Request to agree Strategic Matters	22.07.20
	To discuss the progress of respective emerging draft new Local Plans; associated technical evidence base and future ways of working.	22.07.20
	DtC letter sent to authority to set out LBE land supply and to seek assistance to meet housing need.	26.06.20
London Borough of Hackney	DtC meeting to discuss ELP programme, technical evidence base, FEMA, SILs, Housing Needs Assessment and Strategic Integrated Transport Study.	26.06.20
	Request to agree Strategic Matters	07.01.21
	DtC letter sent to authority to set out LBE land supply and to seek assistance to meet housing need.	07.01.21
	Transport matters (led by WSP)	13.04.21
	DtC letter sent to authority to set out LBE land supply and to seek assistance to meet housing need.	07.01.21

Authority / Body / Organisation	Reason(s) for DtC	Date of meetings: (need to re-draft into date order)
	Transport matters (led by WSP)	09.09.21
	Transport matters (led by WSP)	06.07.23
	Transport matters (led by WSP)	12.09.23
London Borough of Islington	Request to agree Strategic Matters	12.03.22
London Borough of Newham	Request to agree Strategic Matters	02.07.20
	To discuss the progress of respective emerging draft new Local Plans; associated technical evidence base and future ways of working.	02.07.20
	DtC letter sent to authority to set out LBE land supply and to seek assistance to meet housing need.	07.01.21
London Borough of Redbridge	To discuss the progress of respective emerging draft new Local Plans; associated technical evidence base; and future ways of working.	19.06.20
	DtC letter sent to authority to set out LBE land supply and to seek assistance to meet housing need.	07.01.21
	Request to agree Strategic Matters	24.05.21

Authority / Body / Organisation	Reason(s) for DtC	Date of meetings: (need to re-draft into date order)
	Meeting to discuss Housing and Economic Needs	10.10.22
London Borough of Waltham Forrest	Request to agree Strategic Matters	02.12.19
	Local Plan update	02.12.19
	To discuss the progress of respective emerging draft new Local Plans; associated technical evidence base; emerging cross-borough strategic matters; and future ways of working.	27.05.20
	DtC letter sent to authority to set out LBE land supply and to seek assistance to meet housing need.	07.01.21
	Transport matters (led by WSP)	13.04.21
	Transport matters (led by WSP)	09.09.21
	Transport matters (led by WSP)	06.07.23
Transport matters (led by WSP)	12.09.23	
City of London (Conservators of Epping Forest)	Request to agree Strategic Matters	07.01.21

Authority / Body / Organisation	Reason(s) for DtC	Date of meetings: (need to re-draft into date order)
Hertsmere District	Response to Hertsmere's Local Plan Reg-18 consultation, Sept-21 and update on Enfield's Local Plan	22.07.20
	Request to agree Strategic Matters	22.07.20
	To discuss the progress of respective emerging draft new Local Plans; associated technical evidence base; and future ways of working.	22.07.20
	DtC letter sent to authority to set out LBE land supply and to seek assistance to meet housing need.	01.07.21
	Meeting further to DtC request to confirm LBE need cannot be met.	08.02.21
	Transport matters (led by WSP)	06.07.23
	Transport matters (led by WSP)	12.09.23
Welwyn Hatfield	To discuss the progress of respective emerging draft new Local Plans; associated technical evidence base; emerging cross-borough strategic matters; and future ways of working.	15.06.20
	Request to agree Strategic Matters	15.06.20
	DtC letter sent to authority to set out LBE land supply and to seek assistance to meet housing need.	07.01.21
	Emerging cross-borough strategic matters; and future ways of working.	06.07.23

Authority / Body / Organisation	Reason(s) for DtC	Date of meetings: (need to re-draft into date order)
	Transport matters (led by WSP)	06.07.23
	Transport matters (led by WSP)	12.09.23
Broxbourne District	Request to agree Strategic Matters	24.06.20
	To discuss the progress of respective emerging draft new Local Plans; associated technical evidence base; emerging cross-borough strategic matters; and future ways of working.	24.06.20
	DtC letter sent to authority to set out LBE land supply and to seek assistance to meet housing need.	07.01.21
	Transport matters (led by WSP)	06.07.23
	Transport matters (led by WSP)	12.09.23
	Transport matters (led by WSP)	02/05/24
Epping Forest District	Request to agree Strategic Matters	24.02.20
	Epping Forest Oversight Group meeting & Cooperation Member Board	24.02.20
	Epping Forest Oversight Group meeting & Cooperation Member Board	27.05.20
	To discuss the progress of respective emerging draft new Local Plans; associated technical evidence base and future ways of working.	05.08.20

Authority / Body / Organisation	Reason(s) for DtC	Date of meetings: (need to re-draft into date order)
	DtC letter sent to authority to set out LBE land supply and to seek assistance to meet housing need.	07.01.21
	Transport matters (led by WSP)	06.07.23
	Transport matters (led by WSP)	12.09.23
Essex County Council	Request to agree Strategic Matters	24.06.20
	To discuss the progress of respective emerging draft new Local Plans; associated technical evidence base and future ways of working.	24.06.20
	DtC letter sent to authority to set out LBE land supply and to seek assistance to meet housing need.	07.01.21
	Transport matters (led by WSP)	13.04.21
	Transport matters (led by WSP)	09.09.21
	Transport matters (led by WSP)	06.07.23
	Transport matters (led by WSP)	12.09.23
East Herts	Request to agree Strategic Matters	22.07.20
	To discuss the progress of respective emerging draft new Local Plans; associated technical evidence base; and future ways of working.	22.07.20

Authority / Body / Organisation	Reason(s) for DtC	Date of meetings: (need to re-draft into date order)
	DtC letter sent to authority to set out LBE land supply and to seek assistance to meet housing need.	07.01.21
Harlow	Request to agree Strategic Matters	10.06.20
	DtC letter sent to authority to set out LBE land supply and to seek assistance to meet housing need.	07.01.21
Hertfordshire County Council	Request to agree Strategic Matters	06.07.20
	to discuss the progress of respective emerging draft new Local Plans; associated technical evidence base; emerging cross-borough strategic matters; and future ways of working.	06.07.20
	DtC letter sent to authority to set out LBE land supply and to seek assistance to meet housing need.	07.01.21
	Transport matters (led by WSP)	13.04.21
	Transport Assessment Spatial Planning and Modelling attended by Hertfordshire County Council. LB Enfield, LB Haringey and LB Barnet	21.04.21
	Transport Assessment Spatial Planning and Modelling attended by Hertfordshire County Council. LB Enfield, LB Haringey and LB Barnet	08.09.21
	Transport matters (led by WSP)	09.09.21

Authority / Body / Organisation	Reason(s) for DtC	Date of meetings: (need to re-draft into date order)
	Transport matters (led by WSP)	06.07.23
	Transport matters (led by WSP)	12.09.23
	Email communications with Hertfordshire County Council re: Cuffley area, wagon road analysis, Ridgeway and Stag Hill and congestion of M25 (Junction 25).	11.11.23
Uttlesford	DtC letter sent to authority to set out LBE land supply and to seek assistance to meet housing need.	07.01.21
	Meeting further to DtC request – to confirm LBE need cannot be met.	10.02.21
	Request to agree Strategic Matters	06.07.20
	To discuss the progress of respective emerging draft new Local Plans; associated technical evidence base and future ways of working.	06.07.20
Greater London Authority	Strategic Transport Assessment - Six Authorities Officer Group Meeting- Broxbourne Borough Council, LB Enfield, Lee Valley Park, City of London, Essex County Council, Epping Forest District Council, Hertfordshire County Council.	17.04.19
	Strategic Transport Assessment - Six Authorities Officer Group Meeting- Broxbourne Borough Council, LB Enfield, Lee Valley Park, City of London, Essex County Council, Epping Forest District Council, Hertfordshire County Council.	28.11.19

Authority / Body / Organisation	Reason(s) for DtC	Date of meetings: (need to re-draft into date order)
	GLA, Duty to Cooperate Workshop: Enfield Local Plan Integrated Impact. Attended by: GLA, Natural England, Historic England, Environment Agency, TFL, LB Barnet, LB Haringey, LB Waltham Forest, Broxbourne Borough Council, Hertfordshire County Council, Epping Forest District Council, Hertsmere Borough Council, Essex County Council, Welwyn Hatfield Borough Council	02.12.19
	GLA and Enfield- Strategic Meeting – part of initial ELP discussions.	27.02.20
	GLA and Enfield- Strategic Meeting – part of initial ELP discussions.	10.02.20
	GLA / Edmonton Steering Group – to provide an update on the Edmonton Vision Group (TfL also in attendance).	29.01.21
	LBE GLA - Catch-up - Enfield Local Plan Preparation - DTC Correspondence on Need	10.02.21
	Meridian Water Working Group – to discuss Meridian Water SPD. Attended by LBE, GLA, Waltham Forest and Haringey	06.05.21
	Director level meeting - GLA	02.11.22
	Director level meeting - GLA	03.11.22
	Director level meeting - GLA	24.11.22
	Leader of the council requested a meeting with the GLA under DtC. GLA directed Enfield to base its housing target on an assessment as set out in paragraph 4.1.11 of the London Plan.	05.12.22

Authority / Body / Organisation	Reason(s) for DtC	Date of meetings: (need to re-draft into date order)
	Director level meeting - GLA	28.02.23
	Director level meeting – LBE, GLA and TFL	19.06.23
	Director level meeting – LBE, GLA and Stantec (previously Barton Willmore)	20.07.23
	Employment matters	20.07.23
	Character of Growth and Tall Buildings	02.08.23
	Housing sites and numbers	04.08.23
	Director level meeting - GLA	07.08.23
	Urban placemaking areas	22.08.23
	Director level meeting – GLA – Placemaking meeting	22.08.23
	Rural Placemaking areas	08.09.23
	Rural placemaking areas and bringing it all together - Enfield Local Plan and the GLA	08.09.23
	Director level meeting – GLA and Rnetso	01.11.23
	GLA and Enfield meeting a meeting to update officers on ELP progress, next steps in terms of preparing statement of conformity and meeting before rep is formally made	28.02.24

Authority / Body / Organisation	Reason(s) for DtC	Date of meetings: (need to re-draft into date order)
	LBE, GLA and TfL – spatial planning and transport with a particular focus on Crews Hill and Chase Park	29.02.24
	Strategic Transport discussions	13/03/24
	Strategic Transport discussions (WSP)	24/05/24
Southwest Hertfordshire	Response to joint Strategic Plan and update on ELP	10.02.21
Lee Valley Regional Park Authority	Update on ELP progress and sites promoted by the LVRPA	24.08.21
	DtC meeting	29.07.21
	Transport matters (led by WSP)	06.07.23
	Transport matters (led by WSP)	12.09.23
	Meeting to discuss Statement of Common Ground	08/07/24
Other	<p>Note LBE attendance at the following as part of DtC:</p> <ul style="list-style-type: none"> • Association of London Borough Planning Officers (ALBPO) Development Plans Committee and the ALBPO Policy Officers Sub-Group. • Neighbourhood Planning Group 	<p>29/06/21</p> <p>16/09/21</p> <p>12/10/21</p>

Authority / Body / Organisation	Reason(s) for DtC	Date of meetings: (need to re-draft into date order)
	<ul style="list-style-type: none"> • Local London Partnership • North London Waste Planning Group (note W&M plan adopted – potentially no engagement) • London Legacy Development Corporation area – as above • London Waste Planning Forum – as above <p>Note here the ‘all borough meetings to develop the ‘Delivering net Zero’ Study</p>	<p>16/12/21</p> <p>08/03/22</p> <p>08/11/22</p> <p>14/03/23</p> <p>09/05/23</p> <p>07/11/23</p> <p>15/01/24</p>
Prescribed (Statutory) Bodies / Organisation		
Environment Agency	Strategic Flood Risk Assessment (Level 1) meetings and discussions regarding the draft SFRA.	23/03/21
	Final SFRA Level 1 sign off.	2/12/21
	SFRA Level 2 work and forthcoming Topic Paper	09/05/24
	Discussion on Statement of Common Ground and Topic Paper	12/06/24

Authority / Body / Organisation	Reason(s) for DtC	Date of meetings: (need to re-draft into date order)
National Highways (previously Highways England)	Request to agree Strategic Matters	06.07.19
	Transport matters (lead by WSP) to discuss emerging Strategic Transport Assessment. In attendance: Highways England, Transport for London, Network Rail, London boroughs of Enfield, Barnet and Haringey, Herts CC, WSP-transport	30.09.19
		24.03.20
	Highway England and LB Enfield- on M25 J25 Independent Assurance Review Meeting	21.04.21
	Road Investment Strategy 2 Submission Meeting	28.07.21
		29.07.21
		30.07.21
		08.09.21
		07.10.22
		12.01.23
		12.09.23
		13/03/24
	13/06/24	

Authority / Body / Organisation	Reason(s) for DtC	Date of meetings: (need to re-draft into date order)
		09/07/24
Network Rail	Request to agree Strategic Matters	29.07.21
	DtC Meeting	29.07.21
	Transport matters (led by WSP)	13.04.21
	Transport matters (led by WSP)	29.07.21
	Transport matters (led by WSP)	12.01.23
	Transport matters (led by WSP)	20.09.23
	Initial discussion with Network Rail re: Crews Hill and Chase Park. It followed the issue of an initial information pack to NR, and subsequent NR feedback. The meeting was the opportunity for a client and design team introduction to key NR personnel moving forward, and to discuss likely next steps. Lead by Hyas. Part of the Developer Forum meetings.	08.09.23
Natural England	Request to agree Strategic Matters	01.03.19
	Epping Forest Recreational Mitigation	01.03.19
	Epping Forest Recreational Mitigation – meeting with conservators of Epping Forest	08.03.19
	Epping Forest Recreational Mitigation – Meeting with affected London Boroughs	09.09.19

Authority / Body / Organisation	Reason(s) for DtC	Date of meetings: (need to re-draft into date order)
	Finance Group	26.02.21
	Epping Forest Governance Meeting – follow up	05.03.21
	Epping Forest Finance Subgroup Meeting	26.03.21
	Epping Forest - Governance Meeting 3	23.04.21
	Epping Forest Strategic Solution Meeting (with London Boroughs)	28.05.21
	Epping Forest Strategic Solution Meeting (with London Boroughs)	02.07.21
	Regulation 18 Consultation. Discussed Air Quality Impacts (and emerging Air Quality Assessments). Attended by WSP also.	09.08.21
	Epping Forest Strategic Solution (with London Boroughs)	10.09.21
	Epping Forest Strategic Solution - Oversight Meeting	21.10.21
	Enfield SAMM Agreement	16.06.22
	Epping Forest Oversight Group (with London Boroughs)	29.09.22
	Epping Forest Oversight Group (with London Boroughs)	12.12.22
	Kick-off Meeting for new bespoke mitigation strategy	04.05.23

Authority / Body / Organisation	Reason(s) for DtC	Date of meetings: (need to re-draft into date order)
	Presentation of Preliminary Mitigation Strategy Approach	02.06.23
	Meeting to discuss Mitigation Approach	06.07.23
	Site Visit to Potential Mitigation Projects	27.07.23
	Meeting to discuss draft Mitigation Strategy	30.08.23
	NE Received Draft Mitigation strategy	01.09.23
	NE Confirmation that the Mitigation Strategy was agreed	15.09.23
	Natural England – to discuss recreation pressure and zone of influence, BNG and connectivity corridors. Note NE green infrastructure framework requirements. Lead by Hyas. Part of the Developer Forum meetings.	02.06.23
	Local Plan progression meeting	19/04/24
Historic England	Request to agree Strategic Matters	04.08.21
	HE rep discussion, key issues, and actions to develop priorities for ELP.	13.01.22
	Meeting with Historic England – to discuss feedback on urban and rural areas.	15.09.22
	Meeting to discuss feedback on urban and rural areas. Agreed to share Master planning brief for strategic sites, and urban typology works	20.09.22

Authority / Body / Organisation	Reason(s) for DtC	Date of meetings: (need to re-draft into date order)
	Meeting to discuss progress and detailed comments plus evidence base (including tall buildings).	22.03.23
	Meeting update on ELP, HELAA and potential additional site allocations	28.11.23
	Historic England – Historical importance of Trent Park. Need to consider Enfield Chase and placemaking. Brook features and Whitewebbs. Lead by Hyas. Part of the Developer Forum meetings.	19.05.23
	Meeting Scheduled to discuss evidence base	07.05.24
	Meeting to discuss Regulation 19 response	12.07.24
	Meeting to discuss Statement of Common Ground	22.07.24
CCG (superseded by HUDC and NCL)	Request strategic matters	12.06.21
	NHS – Primary Care Infrastructure Requirements	15.06.23
	London Healthy Urban Development Unit (LHDU) – preliminary comments received on ELP, site allocations and infrastructure requirements. To be noted during Reg 19 consultation. Vision and Objections were welcomed.	07.02.24
National Grid	Request to agree Strategic Matters	LBE looking to produce a separate

Authority / Body / Organisation	Reason(s) for DtC	Date of meetings: (need to re-draft into date order)
		Statement of Common Ground to agree key issues and Information
Coal Authority	Request to agree Strategic Matters	LBE looking to produce a separate Statement of Common Ground to agree key issues and Information
Civil Aviation Authority	Request to agree Strategic Matters	LBE looking to produce a separate Statement of Common Ground to agree key issues and Information

Authority / Body / Organisation	Reason(s) for DtC	Date of meetings: (need to re-draft into date order)
Marine Management Organisation	Request to agree Strategic Matters	LBE looking to produce a separate Statement of Common Ground to agree key issues and Information
River and Canal Trust	Request to agree Strategic Matters	LBE looking to produce a separate Statement of Common Ground to agree key issues and Information
National Gas Transmission	Request to agree Strategic Matters	LBE looking to produce a separate Statement of Common Ground to agree

Authority / Body / Organisation	Reason(s) for DtC	Date of meetings: (need to re-draft into date order)
		key issues and Information
Thames Water Utilities	Request to agree Strategic Matters	08.08.23
	Discussions around planned upgrade and reinforcement of water supply and sewage treatment infrastructure for IDP / SA infrastructure requirements.	08.08.23
Transport for London (TfL)	TFL, LB Enfield and Arup- Enfield- Integrated Strategic Transport Study	27.01.20
	Rapid Transit meeting	20.02.20
	Transport Assessment Spatial Planning and Modelling	06.05.20
	ELP Regulation 18 consultation	21.07.21
	TFL / Hertfordshire/ Barnet / Waltham Forest / Haringey / Broxbourne / Hertsmere / Epping Forest / Lee Valley / WSP / David B Taylor / Waltham Forest / Epping Forest	06.07.23
	Transport matters (led by WSP)	13.04.21
	Transport matters (led by WSP)	28.07.21
	Transport matters (led by WSP)	24.02.22
	Transport matters (led by WSP)	07.10.22

Authority / Body / Organisation	Reason(s) for DtC	Date of meetings: (need to re-draft into date order)
	Transport matters (led by WSP)	12.01.23
	Transport matters (led by WSP)	06.07.23
	Transport matters (led by WSP)	12.09.23
	Crews Hill and Chase Park – TfL discussion (by email) re: busses.	08.08.23
	To discuss the Reg 19 Plan and clarify assumptions, evidence and policy wording on Crews Hill, Chase Park and transport requirements for site allocations.	29.02.24
	Meeting to discuss SoCG.	29.07.24
Sport England	Meeting to Discuss Built Facilities Study	05/07/24
	Meeting to discuss Sport England Rep and proposed actions	07/06/24
	Meeting to Discuss Play Pitch Strategy (inception meeting)	23/07/24

Appendix 2: Joint Working Schedule

Strategic Matter / Cross Boundary Issue	Joint Study	Organisation Involved	Status
Housing Need	Strategic Housing market Assessment	GLA and multiple London Boroughs	Complete and published
Employment	FEMA	GLA and multiple London Boroughs	Complete and published
Gypsies and Travellers	Joint GTANA	GLA and multiple London Boroughs	Will be within the Public domain from the 3 rd September 2024
Transport	Strategic Transport Assessment	National Highways	Complete and published.
Education	Strategic Site Infrastructure	Department for Education	Ongoing engagement
Flood Risk	SFRA (Dec 2021)	LBE and the Environment Agency	Complete and published.
Climate Change	Delivering Net Zero study	Barking & Dagenham / Be First Barnet Camden Ealing	Complete and published.

Strategic Matter / Cross Boundary Issue	Joint Study	Organisation Involved	Status
		Enfield Greenwich Hackney Haringey Harrow Havering Hounslow Kensington and Chelsea Merton Sutton Tower Hamlets Waltham Forest Wandsworth Westminster	
Sustainable Development	Integrated Impact Assessment (IIA) and Habitat Regulations Assessment (Scoping Report) preparation	Lee Valley Regional Park, LBE and Aecom meeting- Enfield Local Plan	Completed and published.

ENFIELD
Council



STATEMENT OF COMMON GROUND
between
LONDON BOROUGH OF ENFIELD
and
AFFINITY WATER LIMITED
July 2024

1. Introduction

- 1.1 This Statement of Common Ground has been prepared jointly between London Borough of Enfield Council (LBE) and Affinity Water Limited (AWL). AWL is a specific consultation body for Local Plan consultation and is responsible for providing the water supply in part of the London Borough of Enfield. AWL's role in the planning system as a specific consultation body is set out in The Town and Country Planning (Development Management Procedure) (England) Order 2015 and in Government Planning Practice Guidance.
- 1.2 In relation to strategic planning matters, section 33A(1) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004) indicates that Local Planning Authorities have a duty to cooperate with bodies (or other persons) within subsection (9) and paragraphs (a), (b) and (c) of subsection (1), in section 33A(1) of the PCPA 2004.
- 1.3 This approach is also a requirement of national planning policy. Paragraph 35 of the National Planning Policy Framework seeks to ensure that the Local Plan is deliverable over the plan period and based on effective joint working on strategic matters that have been dealt with rather than deferred, as evidenced by the Statement of Common Ground (SoCG).
- 1.4 The Duty to Cooperate was established in the Localism Act 2011. The Duty to Cooperate requires all Local Planning Authorities (LPAs) to engage constructively, actively and on an ongoing basis in relation to cross-boundary issues.
- 1.5 Both parties are prescribed bodies for the purposes of the Duty to Cooperate.
- 1.6 The purpose of a SoCG is to set out the confirmed agreements and disagreements with regard to strategic and cross-boundary issues surrounding the Enfield Local Plan. This is the result of early, meaningful and continuous engagement between the LPA, Specific consultation body and key stakeholders in the Local Plan process.
- 1.7 This SoCG reflects the current position between LBE and AWL. It will be updated as and when required. LBE acknowledges at the time of signing this SOCG, Affinity Water's WRMP and Business Plan have not been confirmed and therefore this position may change.
- 1.8 LBE and AWL will continue to meet to discuss strategic planning matters as the Enfield Local Plan progresses to submission and examination. As a minimum, a meeting will take place prior to submission of the Enfield Local Plan for examination.

2. Matters

2.1 This SoCG sets out the confirmed points of agreement, or otherwise between the parties with regard to Strategic Planning Matters arising from planning policy proposals in the emerging Enfield Local Plan (2019 – 2041).

2.2 More specifically, this SoCG sets out the confirmed points of agreement for the following allocated sites for development which are within AWL's supply area:

- Land between Camlet Way and Crescent West, Hadley;
- Blackhorse Tower, Holbrook House, Churchwood House and 116 Cockfosters Road; and
- Cockfosters Station Car Park (Parcel a & b) Cockfosters Road, Barnet.

3. Areas of Common Ground

3.1 Both parties agree that the Spatial Strategy is an appropriate strategy in delivering sustainable development over the plan period.

3.2 Both parties agree that the above proposed allocated sites are sound and appropriate for development from a water supply perspective and where further modifications are proposed by the Planning Inspector, LBE would be supportive of these modifications being made.

3.3 LBE and AWL agree that new developments should have a set target for water use of 110 litres per person per day or less by 2050, as provided for in Part G of the Building Regulations 2010 and will seek to have this evaluated using post occupancy evaluation criteria after minimum occupancy period of six months.

3.4 All parties agree to continue to work together collaboratively on the Strategic Planning Matters in the emerging Enfield Local Plan.

4. Outstanding Matters (Areas of Disagreement)

4.1 There are currently no outstanding matters of disagreement between LBE and AWL.

AGREEMENT

Signed on behalf of London Borough of Enfield

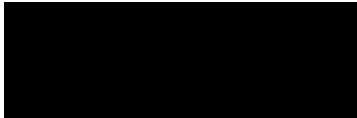


Brett Leahy - Director of Planning & Growth - Environment & Communities

Enfield Council

Dated: 25/07/2024

Signed on behalf of Affinity Water Limited



Ellie Powers – Head of Water Resources & Environment

Dated: 26 July 2024

ENFIELD
Council



STATEMENT OF COMMON GROUND
between
LONDON BOROUGH OF ENFIELD
and
Environment Agency
July 2024

1. Introduction

- 1.1 This Statement of Common Ground has been prepared jointly between London Borough of Enfield Council (LBE) and the Environment Agency (EA). The EA are responsible for tidal and fluvial flooding across the Borough. The EA's role in the planning system is as a statutory consultee as set out in The Town and Country Planning (Development Management Procedure) (England) Order 2015 and in Government Planning Practice Guidance.
- 1.1 In relation to strategic planning matters, section 33A (1) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004) indicates that Local Planning Authorities have a duty to cooperate with bodies (or other persons) within subsection (9) and paragraphs (a), (b) and (c) of subsection (1), in section 33A(1) of the PCPA 2004.
- 1.2 This approach is also a requirement of national planning policy. Paragraph 35 of the National Planning Policy Framework seeks to ensure that the Local Plan is deliverable over the plan period and based on effective joint working on strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
- 1.3 The Duty to Cooperate was established in the Localism Act 2011. The Duty to Cooperate requires all Local Planning Authorities (LPAs) to engage constructively, actively and on an ongoing basis in relation to cross-boundary issues.
- 1.4 Both parties are prescribed bodies for the purposes of the Duty to Cooperate.
- 1.5 The purpose of this Statement of Common Ground is to set out the confirmed agreements and disagreements with regard to strategic and cross- boundary issues surrounding the Enfield Local Plan. This is the result of early, meaningful and continuous engagement between the Local Planning Authority and statutory consultees and key stakeholders in the Local Plan process.
- 1.6 This Statement of Common Ground reflects the current position between LBE Council and the EA. It will be updated as and when required.
- 1.7 LBE Council and the EA will continue to meet to discuss strategic planning matters as the Enfield Local Plan progresses to submission and examination. As a minimum, a meeting will take place prior to submission of the Enfield Local Plan for examination subject to availability of the parties and any required non-statutory charging agreements.
- 1.8 Appendix A provides a full breakdown of EA's response to the Enfield Local Plan Publication Draft consultation and LBE's response to these concerns.

2. Matters

2.1 This SoCG sets out the confirmed points of agreement and disagreement between the parties with regard to strategic planning matters arising from planning policy proposals in the emerging Enfield Local Plan (2019 – 2041), specifically in relation to:

- The Sequential Test Report
- Strategic Flood Risk Assessment Level 1
- Strategic Flood Risk Assessment Level 2
- Site Allocations - Flood Zones

2.2 The EA has raised concerns regarding some of the content of the Sequential Test and the Strategic Test Level 1 and Level 2 in relation to the conclusions.

2.3 LBE Council and the EA met to discuss their concerns regarding the evidence base and agreed a way forward. It was agreed that LBE Council would review the evidence and provide more detail. This could be achieved via a Topic Paper.

3. Areas of Common Ground

3.1 Both parties agree that the Level 1 Strategic Flood Risk Assessment is acceptable.

3.2 Both parties agree that the EA have concerns with the Level 2 Strategic Flood Risk Assessment. This is primarily in relation to the sequential and exception tests and the allocation of sites that have failed these.

3.3 Both parties agree that the sequential and exceptions tests need to be redone, this could be in the form of a topic paper prepared by the LBE. LBE will work with the EA to agree the content of this.

3.4 Both parties agree that any sites that still fail the sequential and exceptions tests (as per the topic paper or other document prepared by LBE) will be removed as site allocations.

3.5 The parties agree to continue to work together collaboratively on the Strategic Matters of the emerging Enfield Local Plan.

4. Outstanding Matters

Sequential Test Report

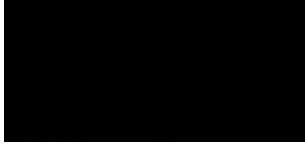
4.1 While the EA understands the approach taken by the LBE Council, it has raised concerns about the outcomes of the Level 2 SFRA (dated July 2023). This is due to the allocation of sites that have failed the Sequential Test and/or the Exceptions test in line with the document referenced above.

Strategic Flood Risk Assessment Level 2

4.2 The EA has raised concerns about the conclusions within some of the site tables for proposed allocations within the Level 2 SFRA. The EA and LBE agree that the concerns can be addressed by redoing the sequential and exceptions tests. This could be via the form of a topic paper, based on the guidance set out in the EA's formal response to the LBE Regulation 19 consultation (dated: 20.05.2024). Any sites that still fail the tests should be subsequently removed as site allocations.

AGREEMENT

Signed on behalf of London Borough of Enfield



Brett Leahy - Director of Planning & Growth - Environment & Communities

Enfield Council

Dated: 30th July 2024

Signed on behalf of Environment Agency



Signed: Harry Scott

Position: Planning Advisor, Hertfordshire and North London Team

Date: 29.07.2024

Appendix A: A full breakdown of EA's response to the Enfield Local Plan Publication Draft consultation and LBE's response to these concerns.

Policy/Section of Plan	SE Comment	LBE response
<p>Level 2 Strategic Flood Risk Assessment 2023 (L2 SFRA) – prepared by BMT.</p>	<p>The L2 SFRA has been submitted as part of the evidence base for Enfield's draft submission of their local plan. We find that this fails to justify numerous site allocations due to table 5.1 highlighting that several sites have failed the sequential test, and/or the exceptions test. Sites that fail either of these tests should not be allocated as site allocations as per paragraphs 168 and 171 of the National Planning Policy Framework and paragraphs 25 and 33 of the Flood Risk and Coastal Change Planning Practice Guidance.</p> <p>To overcome this issue, we strongly recommend that a new L2 SFRA is submitted based on the available guidance, and that any sites that still fail the sequential and/or exceptions tests are subsequently deleted from the site allocations.</p> <p>Modelling The L2 SFRA does not make it clear what modelling has been used and how appropriate it is. It also fails to assess speed of onset, velocity, depth or flooding. We recommend these factors are considered in further detail.</p> <p>Reservoir Data There should be an improved assessment of reservoir data in the L2 SFRA. This includes for development that is proposed downstream of a reservoir to assess whether work is needed to improve the design or maintenance of the reservoir. The L2 SFRA also fails to assess if a development could affect the operation of a reservoir and the potential impact this could have on flood risk.</p>	<p>LBE Council will produce a Topic Paper setting out further detail and clarification on the concerns raised by the EA in relation to the SFRA Level 2.</p>

Policy/Section of Plan	SE Comment	LBE response
	<p>User Guide We strongly recommend that the L2 SFRA is accompanied by a clear user guide. This should include guidance on which maps and sections of the report to refer to in different circumstances.</p>	
<p>Site Allocations - Flood Zones</p>	<p>Table 1 within the EA's Regulation 19 response.</p>	<p>Thank you for this information. The flood zones for each site have been reflected within the Site Assessment process and within the SFRA/Sequential Test.</p>

ENFIELD
Council



STATEMENT OF COMMON GROUND
between
LONDON BOROUGH OF ENFIELD
and
LEE VALLEY REGIONAL PARK AUTHORITY
July 2024

1. Introduction

- 1.1 This Statement of Common Ground has been prepared jointly between London Borough of Enfield Council (LBE) and Lee Valley Regional Park Authority (LVRPA). LVRPA's role in the planning system is as a statutory consultee as set out in The Town and Country Planning (Development Management Procedure) (England) Order 2015 and in Government Planning Practice Guidance.
- 1.2 In relation to strategic planning matters, section 33A (1) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004) indicates that Local Planning Authorities have a duty to cooperate with bodies (or other persons) within subsection (9) and paragraphs (a), (b) and (c) of subsection (1), in section 33A(1) of the PCPA 2004.
- 1.3 This approach is also a requirement of national planning policy. Paragraph 35 of the National Planning Policy Framework seeks to ensure that the Local Plan is deliverable over the plan period and based on effective joint working on strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
- 1.4 The Duty to Cooperate was established in the Localism Act 2011. The Duty to Cooperate requires all Local Planning Authorities (LPAs) to engage constructively, actively and on an ongoing basis in relation to cross-boundary issues.
- 1.5 Both parties are prescribed bodies for the purposes of the Duty to Cooperate.
- 1.6 The purpose of a Statement of Common Ground is to set out the confirmed agreements and disagreements with regard to strategic and cross- boundary issues surrounding the Enfield Local Plan. This is the result of early, meaningful and continuous engagement between the Local Planning Authority and statutory consultees and key stakeholders in the Local Plan process.
- 1.7 This Statement of Common Ground reflects the current position between LBE Council and the LVRPA. It will be updated as and when required.
- 1.8 LBE Council and the LVRPA will continue to meet to discuss strategic planning matters as the Enfield Local Plan progresses to submission and examination. As a minimum, a meeting will take place prior to submission of the Enfield Local Plan for examination
- 1.9 Appendix A provides a breakdown of LVRPA's response to the Enfield Local Plan Publication Draft consultation focusing largely on those comments made about planning policy matters, and sets out LBE's response to these

concerns. One additional response made jointly by the Authority and London Borough of Enfield Property is to be addressed in a separate SoCG.

2. Matters

2.1 This SoCG sets out the confirmed points of agreement, or otherwise between the parties with regard to strategic planning matters arising from planning policy proposals in the emerging Enfield Local Plan (2019 – 2041), specifically in relation to:

- Fig 3.10 'Rural Enfield Placemaking Vision'
- Site Allocation RUR.06 Land at Pickett's Lock
- Policy BG5 at para 6.30
- Strategic Policy PL5 Meridian Water
- Strategic Policy PL9 Rural Enfield
- Vision and Strategic Objective 12
- RUR.03 Land West of Rammey Marsh
- Policy CL3 Visitor Accommodation
- Policy CL2 Leisure and Tourism
- Policy BG7 4 Enhancing the Beneficial Uses of the Green Belt and Metropolitan Open Land

3. Areas of Common Ground

3.1 Both parties agree that the Spatial Strategy is an appropriate strategy in delivering sustainable development over the plan period.

3.2 Both parties agree that LVRPA concerns with the relevant parts of the Local Plan can be addressed through proposed modifications.

3.3 Both parties agree to continue to work together collaboratively on Strategic Matters, including developing any relevant policies for the LVRPA, in the emerging Enfield Local Plan ahead of the Examination Hearings.

4. Outstanding Matters (Areas of Disagreement)

4.1 There are no outstanding matters of disagreement.

5. Further matters

5.1 The LVRPA has submitted a further representation as part of its response to the draft Enfield Local Plan by virtue of its role as landowner. This relates to draft Site Allocation SA.RUR.03 – Land West of Rammey Marsh and is a joint representation with LBE Property. As part of the ongoing process of

engagement and collaborative working a further Statement of Common Ground is due to be agreed between all the parties in relation to this matter.

AGREEMENT:

Signed on behalf of London Borough of Enfield



**Brett Leahy - Director of Planning & Growth - Environment & Communities
Enfield Council**

Dated: 25/07/2024

Signed on behalf of Lee Valley Regional Park Authority



Shaun Dawson – Chief Executive Lee Valley Regional Park Authority

Dated: 30/07/2024

Appendix A: A full breakdown of LVRPA’s response to the Enfield Local Plan Publication Draft consultation and LBE’s response to these concerns.

Policy/Section of Plan	LVRPA Comment	LBE response
Figure 3.10	<p>An additional notation should also be added to Fig 3.10 ‘Rural Enfield Placemaking Vision’ to identify the ‘Lee Valley Leisure Centre at Pickett’s Lock’ and highlight this as an existing sports venue as well as an area of green space with biodiversity value. This would provide clarity in relation to the amended policy PL9 2.i.where reference is now included to Pickett’s Lock as a hub of sporting excellence.</p>	<p>LBE notes the proposed modifications. These are not considered necessary for soundness, however if they are further proposed by the Inspector, LBE would be supportive of these modifications being made</p>
Site Allocation RUR.06 Land at Pickett’s Lock	<p>The Authority supports the references to Pickett’s Lock which are now included under a number of policies and accompanying explanatory text in the draft Local Plan. A minor amendment is sought to the Site Allocation RUR.06 Land at Pickett’s Lock.</p> <p>Pickett’s Lock forms part of the Regional Park within Enfield and is a strategic site within the east of the Borough with a long history of leisure use. It is currently home to the Lee Valley Athletics Centre, the Oden Luxe Lee Valley Cinema, a golf course, and camp site.</p> <p>The Authority supports the amendments made to Site Allocation for RUR.06 Land at Pickett’s Lock which has been revised to include and refer to the whole of the site area as requested by the Authority. Table C1.181: SA RUR.06 Land at Pickett’s Lock identifies the site as suitable for “new sports, recreation and leisure facilities”.</p> <p>The description of existing uses in Table C1.181 should be amended to read “Lee Valley Leisure Centre at Pickett’s Lock including Athletics Centre, Cinema, golf course, campsite and adjacent land including car park.”</p>	<p>LBE notes the proposed modifications which could be accommodated via a minor edit to text. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made</p>

Policy/Section of Plan	LVRPA Comment	LBE response
Policy BG5 at para 6.30	<p>Minor Modifications sought to supporting text under para 6.30. Reference to Lee Valley County Park should be amended to read Lee Valley Regional Park. It is understood that the Regional Park within Enfield does not form part of the Metropolitan Open Land designation, so this reference will need to be amended.</p>	<p>LBE notes the proposed modifications. These are not considered necessary for soundness, however if they are further proposed by the Inspector, LBE would be supportive of these modifications being made</p>
Strategic Policy PL5 Meridian Water	<p>The Authority notes there have been some minor amendments to Policy PL5 Meridian Water and maintains its previous support for this policy and the Placemaking vision for Meridian Water. The detailed policy guidance for this area is welcomed in particular the points relating to the delivery of green corridors, public open space and the requirement for development to contribute to the naturalisation and ecological enhancement of existing waterways.</p> <p>At the Local Plan Regulation 18 consultation stage the Authority expressed reservations about the demands policy was potentially placing on the waterways within this area – the waterways were identified in policy as part of the public realm, a focal point for cultural activity, with access routes alongside, and an important ecological resource. Policy PL5, Green Infrastructure, point 11 also proposed the Lee Navigation as a venue for water sports facilities. Whilst policy still states that development proposals in Meridian Water “could explore opportunities for water sports facilities along the Lee Navigation...” the Authority supports the additional policy text (red and underlined) that has been added which states “<u>which will be encouraged where it would not have an unacceptable level of harm to ecology and wildlife.</u>”</p> <p>Likewise the amendment to Policy PL5 point 14 under Movement and Connectivity shown in red underlined text below is supported. This now</p>	<p>LBE Note the support to Policy PL5.</p>

Policy/Section of Plan	LVRPA Comment	LBE response
	<p>makes reference, as requested at the Reg 18 consultation stage, to the need for development to also provide connections through to the wider Regional Park area to the north and south of Meridian Water as follows: “Development should also deliver new strategic connections from Meridian Water to key destinations (such as Edmonton Green, North Middlesex Hospital, Angel Edmonton, <u>Pickett’s Lock to the north and Tottenham Marshes to the south</u>) and neighbouring Boroughs (via the Lee Valley Regional Park) to overcome physical severance and provide attractive and safe walking and cycling links.”</p>	
<p>Strategic Policy PL9 Rural Enfield</p>	<p>Modifications to Policy PL9 Rural Enfield</p> <p>It is proposed that Policy support for the Regional Park is provided within the Placemaking section of the Plan, under Strategic Policy PL9 ‘Rural Enfield’, given that the Regional Park makes up the eastern half of the Rural Enfield area as shown on Fig 3.10 ‘Rural Enfield Placemaking Vision.’ The following text (shown in red font below) is proposed as an addition to Policy PL9 Rural Enfield paragraph 1</p> <p>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. <u>The Council will support the work of the Lee Valley Regional Park Authority to realise the full potential of the Regional Park in accordance with the Park Development Framework proposals and to deliver a diverse</u></p>	<p>LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made</p>

Policy/Section of Plan	LVRPA Comment	LBE response
	<p>range of open green and blue spaces, habitats and ecological enhancements, major sporting and leisure venues and visitor attractions.</p> <p>This addition to Policy PL9 1. would complement the new text which the Council has added to the explanatory text for Policy PL9 under para 3.113 which now states: “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. <u>The Council is fully committed to supporting the endeavours of the Lee Valley Regional Park Authority in unlocking the potential of the Regional Park</u>” (please note new text added by the Council shown in red, underlined).</p> <p>Explanatory text should be expanded at this point to set out the statutory role of the Park Authority and its planning functions as established through the Park Act; an example of proposed additional text is set out below. This would demonstrate that the Regional Park and the remit of the Authority is fully and positively embraced by the Local Plan and clarify the Council’s position in respect of the Park Act.</p> <p>The Lee Valley Regional Park Authority (LVRPA) is a statutory authority created by the Lee Valley Regional Park Act 1966 (The Park Act). It has a statutory responsibility to either provide directly or work with partners to provide facilities for sport, recreation, leisure, entertainment and nature conservation throughout the Park. Section 14 (1) of the Park Act requires the Authority to prepare a plan setting out proposals for the future management and development of the Regional Park and riparian</p>	

Policy/Section of Plan	LVRPA Comment	LBE response
	<p>authorities such as Enfield are required to include those parts of the plan affecting their area within their own relevant planning strategies and policies (Section 14(2) 8 (a)) although inclusion does not infer that the planning authority necessarily agrees with them (Section 14(2) (b)).</p> <p>The Park Development Framework Area Proposals are relevant in terms of Section 14 (2) of the Park Act and are formal statements of the Authority's position in respect of development within the Regional Park. Further, sections 14 (subsections 4-7) of the Park Act requires local planning authorities to consult with the LVRPA on applications for planning permission which they consider could affect the Park. Section 14 (subsections 8-9) allows the LVRPA to refer the decisions of the riparian authorities to the Secretary of State if it is considered by the LVRPA that the decision taken materially conflicts with the proposals of the Authority for the development of the Park.</p>	
<p>Vision and Strategic Objective 12</p>	<p>Minor Modification</p> <p>The following wording (red font below) is proposed as a modification to Strategic Objective point 12:</p> <p>12. To deliver significant green infrastructure enhancements, ensuring improved public access to newly established woodlands, restored river corridors and new parks and open spaces for both existing and new residents. To support protection, enhancement and provision of the diverse range of open space, habitats, sporting and leisure venues within the Lee Valley Regional Park. To facilitate the creation of a major green infrastructure corridor in the northern part of the Borough, supporting Enfield's position as a leading 'Green' destination.</p>	<p>LBE notes the proposed modifications. These are not considered necessary for soundness, however if they are further proposed by the Inspector, LBE would be supportive of these modifications being made</p>

Policy/Section of Plan	LVRPA Comment	LBE response
	<p>The Lee Valley Regional Park Authority (LVRPA) is a statutory authority created by the Lee Valley Regional Park Act 1966 (The Park Act). It has a statutory responsibility to either provide directly or work with partners to provide facilities for sport, recreation, leisure, entertainment and nature conservation throughout the Park. It has a strong physical presence within the eastern part of the Borough and forms both a substantial green infrastructure resource and a major leisure and sporting attraction for the Borough's residents delivering across a number of the objectives included as part of the Borough's spatial vision. The proposed modification would highlight this strategic role and justify the policy requirements included within the Local Plan.</p>	
<p>RUR.03 Land West of Rammey Marsh</p>	<p>The Authority supports the Infrastructure Requirements set out within Table C1.174 for ecological and greening enhancements to be delivered throughout the RMW site, and that redevelopment of the site should deliver biodiversity improvements to Rammey Marsh itself as set out under sections IV and V respectively. Design Principle C. is also supported; this states that development on site must create a new area of public open space alongside the Small River Lea with additional tree planting and biodiversity enhancements. These infrastructure and design requirements will ensure development of this site takes account of its location within the Regional Park, and the proximity of adjoining open spaces and that it is designed in a manner that will improve environmental quality and contribute to the blue and green network within which it is situated.</p> <p>Similarly the Infrastructure Requirements for enhanced pedestrian and cycle connectivity set out as part of the development on SA RUR.05 (section II) is also supported as is the need for development to contribute to streetscape improvements, urban greening, tree planting and biodiversity improvements to Rammey Marsh (section III). Officers would</p>	<p>LBE Note the support to allocation RUR.03</p>

Policy/Section of Plan	LVRPA Comment	LBE response
	wish to work closely with the Council on the master planning of this area of the Park to ensure the appropriate and sensitive redevelopment of the land in a comprehensive manner across both sites.	
Policy CL3 Visitor Accommodation	<p>The Authority proposes the following modification to policy text under CL3 para 4 (new text in red bold font) to reflect the fact that visitor accommodation is appropriate within the Park in accordance with the remit of the Regional Park Authority and as part of Rural Enfield of which the Regional Park forms a significant part:</p> <p>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 and the Lee Valley Regional Park in line with policies RE4 and PL8 9</p>	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made
Policy CL2 Leisure and Tourism	<p>A minor modification is sought to Policy CL2 Leisure and Tourism para 1.d. as follows:</p> <p style="padding-left: 40px;">d. proposals which promote greater use of rural parts of Enfield and Lee Valley Regional Park as a leisure and recreational resource without harming local biodiversity or water quality</p> <p>This will ensure policy under CL2 complements policy objectives under PL9 Rural Enfield.</p>	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made
Policy BG7 4 Enhancing the Beneficial Uses of the Green Belt and Metropolitan Open Land'	<p>Modifications – addition to supporting text under Policy BG7 new paragraph proposed after 6.38</p> <p>New Policy BG7 'Enhancing the Beneficial Uses of the Green Belt and Metropolitan Open Land'. Paragraph 4 of this policy states that:</p> <p style="padding-left: 40px;">“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)</p>	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made

Policy/Section of Plan	LVRPA Comment	LBE response
	<p>and green linkages to these projects, depending on which site is most proximate to development”.</p> <p>An explanation is required in supporting text as to what this statement means in relation to the Regional Park. The following wording is suggested:</p> <p>6.38a) The Lee Valley Regional Park Authority has produced detailed proposals for the area of the Regional Park within the green belt in Enfield, as part of its Park Development Framework. These are focused on providing improved visitor facilities and public access, the redevelopment of the Lee Valley Leisure Centre at Pickett’s Lock as a strategic leisure destination, and habitat enhancements at Rammey Marsh East and Swan and Pike Pool. Partnership working is also highlighted as a key mechanism for habitat and public access improvements, particularly in relation to land either side of the North Circular and the large areas of water in this area; the reservoirs, Lee Navigation and at Ponders End Waterfront.</p>	



STATEMENT OF COMMON GROUND

between

LONDON BOROUGH OF ENFIELD

and

Barnet

Broxbourne

Epping Forest

Haringey

Hertsmere

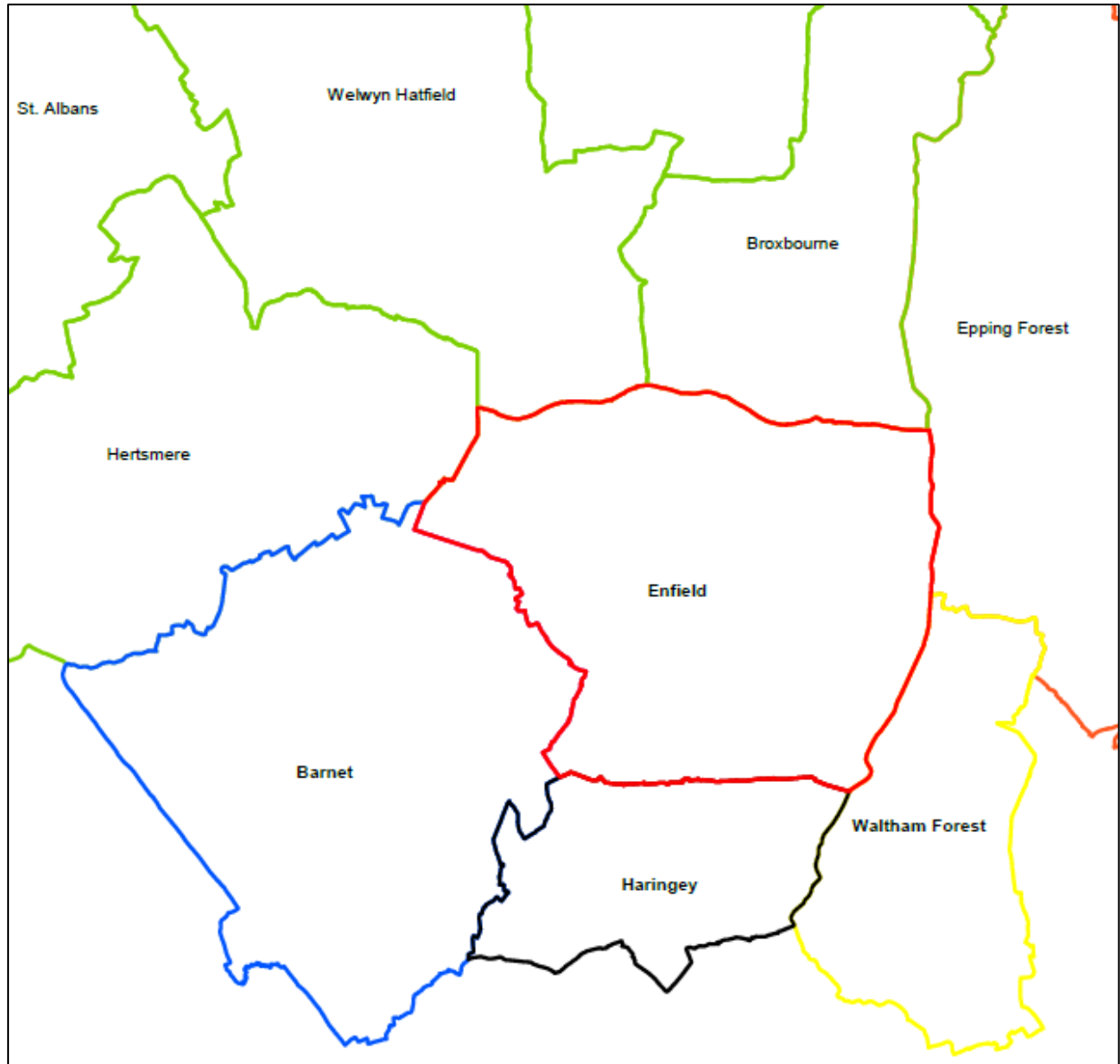
Waltham Forest

Welwyn Hatfield

July 2024

1. Introduction

- 1.1 The purpose of the Statement of Common Ground (SoCG) is to set out areas of common agreement between the London Borough of Enfield (LBE) and Neighbouring Authorities and any areas of disagreement in relation to the emerging Enfield Local Plan 2019 – 2041.
- 1.2 In relation to strategic planning matters, section 33A (1) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004) indicates that Local Planning Authorities have a duty to cooperate with bodies (or other persons) within subsection (9) and paragraphs (a), (b) and (c) of subsection (1), in section 33A(1) of the PCPA 2004. This approach is also a requirement of national planning policy. Paragraph 35 of the National Planning Policy Framework (NPPF) seeks to ensure that the Local Plan is deliverable over the plan period and based on effective joint working on strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
- 1.3 The Duty to Cooperate was established in the Localism Act 2011. The Duty to Cooperate requires all Local Planning Authorities (LPAs) to engage constructively, actively and on an ongoing basis in relation to cross-boundary issues.
- 1.4 This Statement of Common Ground acts as the framework for LBE's delivery of duties and obligations under the Localism Act 2011 and accords with Paragraph 27 of the National Planning Policy Framework (NPPF – Updated December 2023) which requires LPAs to produce and publish one or more Statements of Common Ground. This is detailed further in the government's Planning Practice Guidance (PPG).
- 1.5 This Statement of Common Ground (SoCG) covers the Local Planning Authority area of the London Borough of Enfield (LBE) and the authorities of:
 - Barnet
 - Broxbourne
 - Epping Forest
 - Haringey
 - Hertsmere
 - Waltham Forest
 - Welwyn Hatfield



Enfield and surrounding local authorities

Legend

- Enfield borough
- Haringey borough boundary
- Waltham Forest borough boundary
- Barnet borough boundary
- Hertfordshire regions
- Essex regions



2. Background and Governance

2.1 LBE is the Local Planning Authority for its administrative area and the neighbouring authorities are statutory consultees for the Local Plan process.

2.2 This SoCG sets out the confirmed points of agreement, or otherwise between the parties with regard to strategic planning matters arising from planning policy proposals in the emerging Enfield Local Plan (2019 – 2041), specifically in relation to:

- Housing and Strategy
- Placemaking
- Transport
- Employment
- Gypsies, Romanies and Travellers
- Green Belt
- Crews Hill
- Meridian Water
- Climate Resilience
- Movement and Connectivity
- Southgate Town Centre and Opportunity Area
- Epping Forest SAC 'Zone of Influence'
- Infrastructure and Delivery

2.3 All neighbouring authorities are key strategic partners in the preparation of the emerging Enfield Local Plan. LBE communicates regularly with neighbouring authorities in relation to the preparation of the emerging Local Plan. Key studies have been shared and discussed during the Local Plan preparation process from 2015 and are ongoing, this is in line with duty to co-operate guidelines.

2.4 All parties agree to continue to collaborate on all key evidence base studies when required to resolve strategic matters relating to development.

2.5 LBE has signed Statements of Common Ground with both Barnet and Waltham Forest. This Statement will replace those existing signed SoCGs.

3. Enfield Local Plan Consultations

3.1 From an early stage in the Local Plan process, LBE engaged with neighbouring authorities via the Duty to Cooperate and public consultation process about the range of strategic issues around the Local Plan and its preparation. This includes housing and employment growth, Gypsy, Romany and Traveller (GRT) provision, transport, environment and proposed site allocations.

4. Local Plan Progress of Neighbouring Authorities

Barnet

The Barnet Local Plan (2021 – 2036) was submitted in November 2021 and was examined between 2022 and 2023. The Main modifications were consulted on in May 2024. It is anticipated that the plan will be adopted in Autumn 2024.

Broxbourne

The Broxbourne Local Plan (2018 – 2033) was adopted in June 2020.

Epping Forest

The Epping Forest Local Plan (2011 – 2033) was adopted in March 2023.

Haringey

Haringey's current Local Plan was adopted in 2017 comprising four separate Development Plan Documents. The Council has started work on a new Local Plan intended to run from 2026 to 2041. The Council carried out a New Local Plan First Steps Engagement from November 2020 to February 2021 and is seeking to publish a Draft Local Plan for consultation at the end of 2024.

Hertsmere

Hertsmere has an adopted Local Plan (2012 – 2017) but are preparing a new Local Plan. An additional Regulation 18 consultation took place in April 2024. The Council are now working towards a Regulation 19 draft Local Plan which is anticipated to take place in late 2024.

Waltham Forest

Local Plan Part 1 (LP1) 2020 – 2035, was adopted in February 2024. This sets out the Council's spatial and planning policy framework. The Council are in the process of preparing Local Plan Part 2: Site Allocations (LP2). The document has been subject to 2 public consultations, and the Council will hold a further statutory consultation on the document in the summer/ autumn 2024.

Welwyn Hatfield

The Welwyn Hatfield Local Plan (2016 – 2036) was adopted in October 2023.

5. Matters

Housing and Strategy

Barnet

- Barnet continues to support Enfield's overarching spatial strategy to provide for sustainable growth with supporting infrastructure across the Borough.

Epping Forest

- Epping Forest has no objection to the spatial strategy set out in the Enfield Plan,

Haringey

- Haringey welcomes that a major focus will be placed on regeneration of previous developed sites, regeneration areas in the east of the Borough and London Plan Opportunity Areas in the Lee Valley (including the largest previously developed site at Meridian Water) and at New Southgate (shared with Haringey and Barnet). Although they also highlight the need for a sustainable strategy to deliver the overall housing need over the plan period.

Welwyn Hatfield

- Welwyn Hatfield are concerned that the housing requirement for the Borough will contribute towards a general undersupply of homes set out within the adopted London Plan for the GLA.

Placemaking and Tall Buildings

Barnet

- LB Barnet, LB Enfield and LB Haringey should continue to seek a cooperative approach on site allocations that given the cross-boundary, nature of the area and in particular in relation to place making, including opportunities for taller buildings and supporting infrastructure.

Haringey

- Haringey supports the inclusion of placemaking policies in Enfield's Reg 19 Local Plan, and particularly the identification of New Southgate, Angel Edmonton and Meridian Water as placemaking areas having regard to the nature of the changes proposed and their location close to the boundary of Haringey.
- New Southgate is designated as an Opportunity Area in the London Plan and as such Haringey welcomes working in close partnership with Enfield and Barnet on this key cross boundary development opportunity.
- Haringey notes that Angel Edmonton is identified for significant development and change. They request that they would like to be kept updated on plans for this area, particularly Joyce Avenue and Snells Park Estate due to its proximity to Haringey's North Tottenham Growth Area, which is expected to accommodate significant amounts of new development in the future including at High Road West.
- Haringey has been engaging with Enfield for some considerable time in relation to the delivery of Meridian Water and, as part of this process, has consistently raised the importance of Enfield providing further detail of transport and highways impacts on Haringey.

Meridian Water

Waltham Forest

- Waltham Forest note that the map on page 64 could include points over the waterways to be improved or indicative routes into Haringey/Waltham Forest.
- Waltham Forest note that the Banbury Vision Document, developed with all three boroughs, is not public and should not be referenced in the Local Plan. They propose that a reference is made that public routes and spaces should be designed to be safe and feel secure for women and girls at different times of the day and night.

Crews Hill

Broxbourne

- Broxbourne has concerns about the accuracy of the traffic modelling work underpinning the Enfield Local Plan, in particular arising from the proposals for 5,500 new dwellings at Crews Hill, together with the cumulative impacts of this development and the proposed employment allocation West of Rammey Marsh for at least 70,200sqm of light industrial, storage and distribution, and related sui generis floorspace. This is expanded upon within the transport section below.

Welwyn Hatfield

- The master-planned approach is supported but the Council has concerns regarding the proximity of this proposed development to the settlement of Cuffley.
- The current gap between the settlements is approximately 3.5km. From the indicative location of development on the strategy diagram, it is estimated the gap would reduce to 1.5km.
- The authority remain concerned about the level of harm to the Green Belt arising from this proposed development, in particular the narrowing of the gap with the settlement of Cuffley.
- The authority note that the Enfield's Green Belt and Metropolitan Open Land Assessment 2021¹ identifies the release of land at Crews Hill (LP9_ext) as resulting in Very High Harm to the green belt.
- The Welwyn Hatfield Green Belt Study 2018² in assessing the wider green belt, identifies land to the west and east of Cuffley as "open Land forming a distinctive urban edge". This parcel of land, immediately south of Cuffley and north of the Crews Hill site is identified as making a partial contribution to Green Belt Purpose 2.
- To effectively address the infrastructure implications arising from the Local Plan proposals, it is essential Enfield engages with neighbouring local planning and highway authorities. This should include the impact on the

¹ [Green Belt and MOL Assessment 2021-page 92](#)

² [Welwyn Hatfield Green Belt Study \(welhat.gov.uk\)](#)

demand for services within Waltham Forest arising from the development (including Crews Hill) and the impact on traffic and transport.

- The authority seeks assurances that the development proposed in the Enfield Local Plan has robustly considered the impact on the highway network within Welwyn Hatfield and that has appropriate mitigation measure and sources of funding identified for required works.
- The authority notes the publication of the Draft Enfield Local Plan Submission version and requests that they be kept informed as the plan progresses.

Climate Resilience

Waltham Forest

- The authority generally supports Policy SE7: Managing Flood Risk. To ensure developments that cannot adequately mitigate flooding on or off-site, they recommend a payment in lieu should be sought through Policy SE7. They generally support the policies in the Climate Resilience chapter. However, propose that Policy SE4 should consider lowering the threshold for non-residential development, similar to Waltham Forest's policies, to maximise benefits.

Employment

Barnet

- In relation to Enfield's Employment Land Review (ELR) prepared in 2023, the authority notes a minimum need was identified for an additional net 304,000 sq. m of floorspace for industrial and logistics uses. Enfield is not a significant office location and London Plan Policy E1 does not direct strategic scale growth in office floorspace to the Borough of Enfield. 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 this should be addressed in the Borough's town centres including through mixed use development. LB Barnet supports this position.
- The authority supports Policy E6 Locally Significant Industrial Sites (LSIS) in that it stipulates that LSIS are safeguarded to meet local business needs. General and light industrial, storage and distribution, research and development and related sui generis uses are encouraged in LSIS. Proposals for nonindustrial type uses in LSIS must not compromise the business function of the site and must have regard to the agent of change principle. LB Barnet supports this position and recommends a design led approach to LSIS.

Hertsmere

- The borough's strategy of seeking to meet the Enfield's full employment need is supported.
- There may be a degree of overlap between the Travel to Work Areas / Functional Economic Market Areas as LB Enfield has included Hertsmere

within the Enfield FEMA whilst Hertsmere Borough Council has identified the whole of its local authority area as being within the SW Herts FEMA. Each authority will seek to meet its own employment needs within their individual local authority area, recognising that there are already insufficient previously developed sites to accommodate employment land requirements within each authority.

Nature Conservation and Green Infrastructure

Epping Forest

- The authority welcomes the inclusion of Strategic Policy BG3: 'Protecting Epping Forest Special Area of Conservation'. However, it is noted that whilst Part 7 of the policy refers to Air Quality there is no policy text but rather the policy makes reference to Strategic Policy ENV1 'Local Environmental Protection.' However, neither the wording of Policy ENV1 nor the explanatory text makes specific reference to the Epping Forest's SAC and that the focus of Part 1 of Policy ENV1 in relation to air quality considerations focuses on assessing the impacts of major developments. Notwithstanding this, based on Epping Forest's experience of such matters, Enfield may wish to have regard to the Inspector's Report (9 February 2023) for the Epping Forest Local Plan 2011 – 2033 (the EFDC Local Plan), which was adopted on 6 March 2023, in relation to the effectiveness of policies to avoid any adverse effect on the Epping Forest SAC.

Waltham Forest

- Waltham Forest generally support the policies in the Blue and Green Enfield chapter, particularly the comprehensive references to Biodiversity Net Gain and the Urban Greening Factor. They support green links across Enfield via active travel modes and strategic links to Banbury Reservoir. Reference to the Epping Forest SAC, SAMMS and SANGS mitigation measures is also positive. Policy BG6 Part D should consider adding "*appropriate parking provision that seeks to minimise car parking*" to ensure active travel and modal shift are prioritised.
- The authority generally supports Policy ENV1. To bolster Part 2 '*Noise and Vibration*,' reference should be made to the Agent of Change principle, ensuring the development of sensitive uses does not preclude the effective operation of existing noise-generating uses.

Green Belt

Barnet

- The authority is concerned that any development on site SA.RUR.02 (Land Between Camlet Way and Crescent West, Hadley) should not have a significant detrimental effect on the openness of the Green Belt. There is also concerned that building(s) on site of up to 18m in height could

have a detrimental impact on the sense of openness and may have an adverse spatial and visual impact on the Green Belt, particularly within Barnet.

- The site is adjacent to the Monken Hadley Conservation Area, and the allocation states that “*Development on site must carefully consider impact on the adjacent Monken Hadley Conservation Area*”. The authority welcomes this cross-reference to Barnet’s Local Plan.

Hertsmere

- Presently, Hertsmere Borough Council is of the view that the allocation of land east (and south) of Junction 24 of the M25 (SA RUR.04) would have a significant detrimental effect on strongly performing Green Belt, this forming part of a parcel identified in its Green Belt assessment which prevents neighbouring settlements (Potters Bar and Greater London) from merging and assists in safeguarding the countryside from encroachment. It does not support the proposed allocation and its most recent Regulation 18 Local Plan consultation (April 2024) did not include the portion of the site which extends into Hertsmere.

Transport

Barnet

- The ELP should take account of the impacts of their development proposals closer to the borough boundary on the transport networks of adjoining boroughs. The additional traffic flows modelled should not cause undue concern at this stage.
- LB Barnet’s draft Local Plan highlights that one of the proposed Crossrail 2 routes would connect to New Southgate. Although Crossrail 2 is subject to confirmation, delivery would be towards the latter part of LB Barnet’s Plan period of 2021 to 2036. The already signed Statement of Common Ground stipulates that both boroughs agree to support and promote the potential for the Crossrail 2 route at New Southgate. This is reflected in draft Policy T1. This is welcomed by the authority.

Broxbourne

- Broxbourne has concerns about the accuracy of the traffic modelling work underpinning the Enfield Local Plan, in particular arising from the proposals for 5,500 new dwellings at Crews Hill, together with the cumulative impacts of this development and the proposed employment allocation West of Rammey Marsh for at least 70,200sqm of light industrial, storage and distribution, and related sui generis floorspace.
- Broxbourne Borough Council and Hertfordshire County Council undertook transport modelling as part of work on the Broxbourne Transport Strategy in 2017. The Broxbourne Transport Model was based on the London Highways Assignment (LoHAM) model including the network within Enfield and was extended to cover parts of Hertfordshire and Essex. The network was also

modelled using Hertfordshire County Council's multi-modal COMET model.

- The outputs from the modelling indicated that even with the proposed mitigations and modal shift, by 2033 certain junctions in Broxbourne would be operating at or close to 100% capacity in both the AM and PM peak hour periods, notably at the following junctions:
 - The junction of Newgatestreet Road and Goffs Lane in Goffs Oak
 - The junction of College Road and the A10
 - The junction of Winston Churchill Way and Monarch's Way
 - The junction of Monarch's Way and the A121 Eleanor Cross Road
- In order to accommodate the planned growth in Broxbourne, Broxbourne Borough Council has been working with Hertfordshire County Council to develop a package of interventions on and relating to the A10, to be funded through the Department for Transport's Major Road Network (MRN) scheme. The Council has concerns that if the modelling undertaken by WSP on behalf of Enfield Council underestimates the impacts on junction capacity in Broxbourne, this could have adverse implications for the proposed interventions currently under development on the A10 north of the M25. We are however keen to continue to engage with Enfield and their specialist consultants during the Local Plan examination process to mitigate any potential impact and reduce the potential risk to junction capacities to acceptable levels.

Gypsies, Romanies and Travellers

Barnet

- Both boroughs are awaiting publication of the GLA London wide GTANA and how this is reflected in the review of the London Plan.

Southgate Town Centre

Barnet

- The authority supports the town centre's renewal but highlights that this must take into consideration any impact on the character of the adjacent low-rise suburban housing, a significant part of which is in Barnet. The form of development must be a significant consideration in the siting and design of any tall buildings within Southgate. This matter does not appear to be clarified within Policy PL6. Policy PL6 states that 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"*. Whilst the authority welcomes this approach, it is recommended that the following test is added to the policy *"The neighbouring areas within LB Barnet and LB Enfield must be considered in terms of design impact and town centre catchment to support the hierarchy of town centres as identified in the London Plan"*.

New Southgate Opportunity Area

Barnet

- The authority will continue to work with Enfield to deliver a comprehensive, master planned approach to New Southgate, Policy PL7 “New Southgate” seeks developments to deliver a comprehensive, master planned approach. 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”. The authority welcomes this cross-reference to Barnet’s Local Plan.

Health and Wellbeing

Waltham Forest

- Waltham Forest recognise and commend Enfield's comprehensive approach to promoting health and well-being through its urban planning and policy frameworks.

Movement and connectivity

Waltham Forest

- Waltham Forest is broadly supportive of Enfield’s policy agenda of encouraging investment in active and sustainable transport infrastructure. They ask that Enfield goes further in Policy T2 Part 3 to reduce car parking (e.g. by setting its own car parking standards that exceed the London Plan), ensuring it does not undermine the active and sustainable travel program and supports meeting MTS targets on vehicle trip reduction and road safety through vision zero. It is noted that flexibility in the London Plan can permit significant car parking to be permitted for some use classes within low PTAL, outer London areas, potentially increasing vehicle traffic.

Monitoring and Review

Waltham Forest

- Waltham Forest broadly support the matters identified within the emerging Local Plan but urge the Council to remain conscious of the Meridian Water Link to improve cross-boundary connectivity and better connections to transport hubs at Chingford and Ponders End in Enfield.

Duty to Cooperate

Haringey

- The London Borough of Haringey is at an early stage of preparing its new Local Plan which will once adopted replace the adopted 2017 Plan. They note

Enfield did not provide any feedback on Haringey's New Local Plan First Steps early engagement which took place from November 2020 – February 2021. They are currently working towards a Regulation 18 Draft Local Plan for consultation in late 2024 and look forward to receiving feedback from Enfield on this. Haringey remains committed to engaging with Enfield through the plan-making process, working together on strategic matters and cross-boundary issues.

6. Areas of Common Ground

- 6.1 All parties agree that the Spatial Strategy is an appropriate strategy in delivering sustainable development over the plan period.
- 6.2 All parties agree that Enfield can seek to deliver its housing and employment requirements within the boundaries of the Borough.
- 6.3 All parties agree to continue to work together collaboratively on the Strategic Matters of the emerging Enfield Local Plan.
- 6.4 Neighbouring Authorities and LBE agree that the emerging Local Plan adequately makes provision for habitat regulations and potential impacts on the environment within the borough subject to having due regard to any implications arising from R (on the application of Finch on behalf of the Weald Action Group) (Appellant) v Surrey County Council and others (Respondents) (2024).

7. Outstanding Matters (Areas of Disagreement)

- 7.1 Disagreement between Enfield and Broxbourne Council regarding the accuracy of the Transport modelling undertaken by Enfield Borough Council.

AGREEMENT

Local Planning Authority:	Name of signee:	Position held:	Date of signing:	Signed:
LB Enfield	Brett Leahy	Director of Planning & Growth - Environment & Communities Enfield Council	30 th July 2024	
LB Barnet	Neeru Kareer	Assistant Director of Planning – Barnet Council	25 July 2024	
Broxbourne Borough	Martin Paine	Planning Policy Manager – Borough of Broxbourne Council	30 July 2024	
Epping Forest District	Nigel Richardson	Planning Service Director	25 July 2024	
LB Haringey	Bryce Tudball	Head of Planning, Transport & Infrastructure	15 July 2024	
Hertsmere Borough	George Pavey	Planning Strategy Manager	29 July 2024	
LB Waltham Forest	Ian Rae	Corporate Director Regeneration, Planning & Delivery	27 June 2024	
Welwyn Hatfield Borough	Chris Carter	Assistant Director – (Planning)	TBC	



STATEMENT OF COMMON GROUND
between
LONDON BOROUGH OF ENFIELD
and
NATURAL ENGLAND
July 2024

1. Introduction

- 1.1 The purpose of the Statement of Common Ground (SoCG) is to set out areas of common agreement between the London Borough of Enfield (LBE) and Natural England and any areas of disagreement in relation to the emerging Enfield Local Plan 2019 – 2041, key strategic matters affecting the natural environment.
- 1.2 In relation to strategic planning matters, section 33A (1) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004) indicates that Local Planning Authorities have a duty to cooperate with bodies (or other persons) within subsection (9) and paragraphs (a), (b) and (c) of subsection (1), in section 33A(1) of the PCPA 2004. This approach is also a requirement of national planning policy. Paragraph 35 of the National Planning Policy Framework seeks to ensure that the Local Plan is deliverable over the plan period and based on effective joint working on strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
- 1.3 The Duty to Cooperate was established in the Localism Act 2011. The Duty to Cooperate requires all Local Planning Authorities (LPAs), county councils and public bodies such as Natural England to engage constructively, actively and on an ongoing basis in relation to cross-boundary issues.
- 1.4 This Statement of Common Ground acts as the framework for LBE delivery of duties and obligations under the Localism Act 2011 and accords with

Paragraph 27 of the National Planning Policy Framework (NPPF – 2023) which requires LPAs to produce and publish one or more Statements of Common Ground. This is detailed further in the government's Planning Practice Guidance (PPG).

1.5 This Statement of Common Ground (SoCG) covers the Local Planning Authority area of the London Borough of Enfield, part of which falls within a 6.2km Zone of Influence (Zoi) for the Epping Forest Special Area of Conservation. Both are shown in the maps in Appendix 1 of this statement.

2. Background and Governance

2.1 LBE is the Local Planning Authority for its administrative area and Natural England is a statutory consultee and the government's advisor for the natural environment in England, on a range of environmental matters such as, nature reserves, protected sites and species, recreation and wildlife and habitat conservation helping protect England's nature and landscapes.

2.2 Paragraph 180 of the NPPF (2023) indicates planning policies and decisions should contribute to and enhance the natural and local environment. It adds at Paragraph 181 that plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

2.3 This SoCG sets out the confirmed points of agreement, or otherwise between the parties with regard to strategic planning matters arising from planning policy proposals in the emerging Enfield Local Plan (2019 – 2041), specifically in relation to:

- Epping Forest SAC
- Air Quality
- Recreational Impact/pressure

2.4 Natural England is a key strategic partner in the preparation of the emerging Enfield Local Plan. The Duty to Cooperate Statement details the continuous engagement between the authorities throughout the production of the Local Plan. LBE communicates regularly with Natural England in relation to the preparation of the emerging Local Plan. Key studies have been shared and discussed during the Local Plan preparation process from 2015 and are ongoing in relation to the Enfield Habitats Regulations Assessment; this is in line with duty to co-operate guidelines.

2.5 Both parties agree to continue to collaborate on all key evidence base studies when required to resolve strategic matters relating to the natural environment.

3. Enfield Local Plan Consultations

3.1 From an early stage in the Local Plan process, LBE engaged Natural England in discussions about the range of strategic issues around the Local Plan. This includes site selection, potential impacts on natural assets, flood management and the potential impact on Epping Forest SAC. The Council shared draft policies relating to the natural environment to inform the initial Regulation 18 consultation (2018) which resulted in broad support for policies and themes of the draft Plan.

4. Matters of Discussion and Key Dates/Meetings

Epping Forrest Special Area of Conservation - Recreational Impact

- LBE has been participating in the Epping Forest SAC Technical Oversight Group since 2018, attending quarterly meetings to discuss and agree strategic matters such as the Strategic Access Monitoring and Management (SAMM) Strategy, and associated Governance Agreement with other authorities impacted by Natural England's interim advice note.
- LBE approved the SAMM Strategy on 29 August 2023.
- Natural England Received LBE's Draft Epping Forest Recreational Mitigation Strategy and draft policy wording on 1 September 2023. Prior to this being received, a number of meetings were held between LBE and NE to discuss the emerging Enfield Epping Forest Recreational Mitigation Strategy including on 04 May, 02 June, 06 July, and a site visit of all proposed SANG projects on 27 July.
- Natural England agrees that it supports the approach set out in the Epping Forest SAC Recreational Mitigation Strategy.
- LBE has been participating in the Epping Forest SAC Technical Oversight Group since 2018, attending quarterly meetings to discuss and agree issues related to recreational pressure.
- **Epping Forrest Special Area of Conservation – Air Quality** On 1 December 2023, prior to publication of the Air Dispersion Modelling Assessment report in February 2024, details of locations exceeding the 1% HRA screening threshold were shared with Natural England. These occur within Epping Forest SAC. In response, Natural England advised that an Appropriate Assessment is required, to include details of mitigation to address any Likely Significant Effects.

Enfield Habitats Regulations Assessment (HRA)

The Reg.19 HRA conclusions in relation to air pollution and recreation were:

- Adverse effects on the integrity of Epping Forest SAC, Lee Valley SPA and Ramsar site, Wormley Hoddesdonpark Woods SAC are uncertain, pending further information.
- The air quality assessment and HRA are being undertaken. Necessary mitigation (if any) will be subsequently agreed. After which, a conclusion can be reached to confirm if there will be any adverse effects on the integrity of these European sites as a result of air pollution.

Recreation pressure and Mitigation

- Adverse effects on the integrity of Epping Forest SAC are uncertain, pending further information. No adverse effects on the integrity of Lee Valley SPA and Ramsar site or Wormley Hoddesdonpark Woods SAC.
- The requirements of the Recreation Mitigation Strategy have been incorporated within Policy SP BG3. These are intended to ensure the provision of appropriate natural greenspace to divert visitors and (along with Policy SP BG2) avoid recreational impacts on Epping Forest SAC. However, as noted in paragraph 5.44 of the HRA, the strategy's authors need to confirm that the calculation of visitor uplift underpinning the strategy remains valid for the latest version of the Local Plan. The outcome of this enquiry will be reported in the next version of the HRA.
- Therefore, some uncertainty remains. Until the visitor uplift calculation has been confirmed, it is not possible to conclude that there will be no adverse effects on the integrity of Epping Forest SAC as a result of recreation pressure.

5. Areas of Common Ground

5.1 Both parties agree that they have a positive working relationship and a track record of joint working in partnership projects.

5.2 Both agree to continue to work together collaboratively on the Strategic Matters of the emerging Enfield Local Plan.

5.3 Natural England has approved the SANG Strategy.

6. Outstanding Matters

At this stage, Natural England has indicated that they are supportive of the approach taken. There are currently two outstanding matters which we are continuing to resolve as the plan emerges through to submission and examination.

- Air Quality – further work and/ or meetings between the authorities are needed to demonstrate no adverse effects on integrity on designated sites will

be caused by the local plan: further consideration of acid deposition and habitats at transects where Local Plan is having an impact either alone or in combination. Continued engagement on Air Quality will progress over the coming months.

- Recreation pressure – SANG strategy authors to confirm that uplift calculation remains valid for the latest version of the Local Plan. If changes are proposed, Natural England will be consulted as agreed.

AGREEMENT

Signed on behalf of London Borough of Enfield



Brett Leahy - Director of Planning & Growth - Environment & Communities

Enfield Council

Dated: 25/07/2024

Signed on behalf of Natural England



Isabella Jack – Senior Sustainable Development Officer

Natural England

Dated:

Appendix 1:

This Statement of Common Ground (SoCG) covers the Local Planning Authority area of the London Borough of Enfield, part of which falls within a 6.2km Zone of Influence (ZoI) for the Epping Forest Special Area of Conservation. Both are shown in the maps in the figure below.

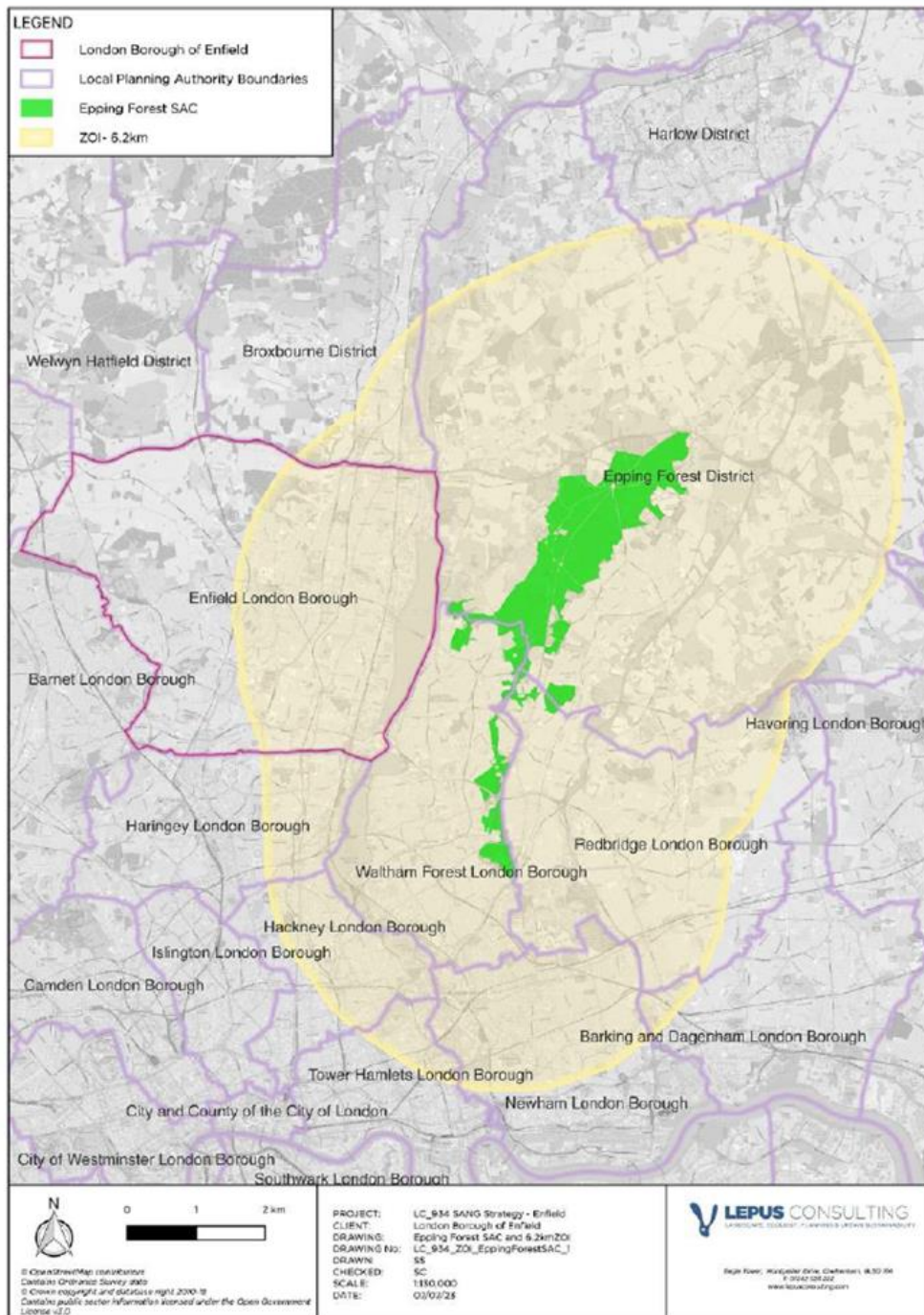


Figure 3.2: Epping Forest SAC Zone of Influence (based on 2017 visitor survey data)



STATEMENT OF COMMON GROUND
between
LONDON BOROUGH OF ENFIELD
and
NETWORK RAIL
JULY 2024

1. Introduction

- 1.1 The purpose of the Statement of Common Ground (SoCG) is to set out areas of common agreement between the London Borough of Enfield (LBE) and Network Rail and any areas of disagreement in relation to the emerging Enfield Local Plan 2019 – 2041, key strategic matters affecting the natural environment.
- 1.2 In relation to strategic planning matters, section 33A (1) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004) indicates that Local Planning Authorities have a duty to cooperate with bodies (or other persons) within subsection (9) and paragraphs (a), (b) and (c) of subsection (1), in section 33A(1) of the PCPA 2004. This approach is also a requirement of national planning policy. Paragraph 35 of the National Planning Policy Framework seeks to ensure that the Local Plan is deliverable over the plan period and based on effective joint working on strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
- 1.3 The Duty to Cooperate was established in the Localism Act 2011. The Duty to Cooperate requires all Local Planning Authorities (LPAs), county councils and public bodies such as Network Rail to engage constructively, actively and on an ongoing basis in relation to cross-boundary issues.
- 1.4 This Statement of Common Ground acts as the framework for LBE delivery of duties and obligations under the Localism Act 2011 and accords with

Paragraph 27 of the National Planning Policy Framework (NPPF – 2023) which requires LPAs to produce and publish one or more Statements of Common Ground. This is detailed further in the government's Planning Practice Guidance (PPG).

1.5 This Statement of Common Ground (SoCG) covers the Local Planning Authority area of the London Borough of Enfield.

2. Background and Governance

2.1 Network Rail is the owner, operator and infrastructure manager of Britain's main railway network. It runs, maintains and develops the core physical infrastructure of the network and has to ensure efficient management of the assets over the short, medium and long-term.

2.2 Within Enfield, Network Rail owns the West Anglia Main Line and the Great Northern Line and associated stations.

2.3 Greater Anglia operates services along the West Anglia Main Line which serves the very eastern extent of Enfield. There are four stations in the borough boundary these are Meridian Water, Ponders End, Brimsdown and Enfield Lock. These provide southbound connections to Stratford and London Liverpool Street and northbound connections towards Stanstead Airport.

2.4 Along the other line, serving the mid and western most areas of the borough, managed by Great Northern there are six stations: Palmers Green, Winchmore Hill, Grange Park, Enfield Chase, Gordon Hill and Crews Hill. Enfield's Great Northern stations provide southbound journeys to Moorgate (41 minutes from Crews Hill and 28 minutes from Palmers Green) and northbound services to Stevenage. The Great Northern also stops at New Southgate and Hadley Wood (step-free access), on a separate Moorgate to Welwyn Garden City.

2.5 In 2019 Enfield and Network Rail opened a new station along the West Anglia Main Line, Meridian Water, to replace the Angel Edmonton station and to better serve the Meridian Water masterplan development.

2.6 Network Rail is a key strategic partner in the preparation of the emerging Enfield Local Plan. As part of the Local Plan engagement, key studies have been shared and discussed during the Local Plan preparation process in line with duty to co-operate guidelines.

2.7 The Local Plan evidence has not indicated an impact on the rail network or its station assets. Opportunities have been identified for site allocations, where station enhancements such as step free access would facilitate modal shift to sustainable travel for existing and new proposed communities in Enfield.

3. Agreed Matters

3.1 Both parties agree to continue to collaborate on all key evidence when required to resolve strategic matters relating to the Network Rail assets.

4. Areas of Common Ground

4.1 Both parties agree that they have a positive working relationship and a track record of joint working in partnership projects. Both agree to continue to work together collaboratively on the Strategic Matters of the emerging Enfield Local Plan.

5. Outstanding Matters

5.1 At this stage, Network Rail have indicated that they are supportive of the approach taken.

AGREEMENT

Signed on behalf of London Borough of Enfield



Brett Leahy - Director of Planning & Growth - Environment & Communities

Enfield Council

Dated: 01 August 2024

Signed on behalf of Network Rail



Richard Joslin, Lead Strategic Planner, Eastern Region Strategic Planning

Dated: 30/07/2024

ENFIELD
Council



STATEMENT OF COMMON GROUND
between
LONDON BOROUGH OF ENFIELD
and
NHS
July 2024

1. Introduction

- 1.1 This Statement of Common Ground has been prepared jointly between London Borough of Enfield Council (LBE) and the National Health Service Property Services (NHSPS). The NHS are a statutory consultee for planning applications and are responsible for provided healthcare services in the Borough. The NHS's role in the planning system is as a statutory consultee as set out in The Town and Country Planning (Development Management Procedure) (England) Order 2015 and in Government Planning Practice Guidance. NHSPS is part of the NHS and is wholly owned by the Department of Health and Social Care (DHSC). NHSPS manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations.
- 1.1 In relation to strategic planning matters, section 33A (1) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004) indicates that Local Planning Authorities have a duty to cooperate with bodies (or other persons) within subsection (9) and paragraphs (a), (b) and (c) of subsection (1), in section 33A(1) of the PCPA 2004.
- 1.2 This approach is also a requirement of national planning policy. Paragraph 35 of the National Planning Policy Framework seeks to ensure that the Local Plan is deliverable over the plan period and based on effective joint working on strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
- 1.3 The Duty to Cooperate was established in the Localism Act 2011. The Duty to Cooperate requires all Local Planning Authorities (LPAs) to engage constructively, actively and on an ongoing basis in relation to cross-boundary issues.
- 1.4 Both parties are prescribed bodies for the purposes of the Duty to Cooperate.
- 1.5 The purpose of a Statement of Common Ground is to set out the confirmed agreements and disagreements with regard to strategic and cross- boundary issues surrounding the Enfield Local Plan. This is the result of early, meaningful and continuous engagement between the Local Planning Authority and statutory consultees and key stakeholders in the Local Plan process.
- 1.6 This Statement of Common Ground reflects the current position between LBE Council and NHSPS. It will be updated as and when required.
- 1.7 Enfield Council and the NHS ICB will continue to meet to discuss strategic planning matters as the Enfield Local Plan progresses to submission and

examination. As a minimum, a meeting will take place prior to submission of the Enfield Local Plan for examination

2. Matters

2.1 This SoCG sets out the confirmed points of agreement, or otherwise between the parties with regard to strategic planning matters arising from planning policy proposals in the emerging Enfield Local Plan (2019 – 2041), specifically in relation to:

- SE1: Responding to the climate emergency
- SC1: Improving Health and Wellbeing of Enfield's Diverse Communities
- SC2: Protecting and Enhancing Social and Community Infrastructure
- H2: Affordable Housing
- D1: Securing Contributions to Mitigate the Impact of Development
- Whole Plan Viability Assessment
- Infrastructure Delivery Plan

3. Areas of Common Ground

3.1 Both parties agree that the Spatial Strategy is an appropriate strategy in delivering sustainable development over the plan period.

3.2 The NHSPS agrees that Strategic Policy SE1 Responding to the climate emergency is sound.

3.3 The NHSPS agrees that Policy SC1: Improving Health and Wellbeing of Enfield's Diverse Communities is sound

3.4 The NHSPS agrees that Policy SC2: Protecting and Enhancing Social and Community Infrastructure is sound, subject to the proposed modifications being made.

3.5 The NHSPS agree that Policy H2: Affordable Housing is sound, subject to the proposed modifications being made.

3.6 The NHSPS agree that the evidence base is sound subject to modifications being made.

3.7 Both parties agree that concerns raised regarding the proposed policies can be addressed through modifications.

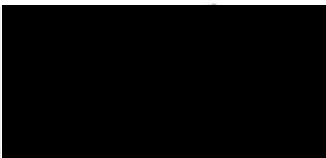
3.8 All parties agree to continue to work together collaboratively on the Strategic Matters of the emerging Enfield Local Plan.

4. Outstanding Matters (Areas of Disagreement)

4.1 There are no outstanding areas of disagreement.

AGREEMENT

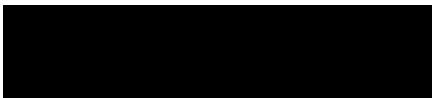
Signed on behalf of London Borough of Enfield



**Brett Leahy - Director of Planning & Growth - Environment & Communities
Enfield Council**

Dated: 23rd July 2024

Signed on behalf of NHS Property Services Ltd (NHSPS)



**Ellen Moore – Associate Town Planner
For and on behalf of NHS Property Services Ltd**

Dated: 16th July 2024

Appendix A: A full breakdown of NHSPS' response to the Enfield Local Plan Publication Draft consultation and LBE's response to these concerns.

Policy/Section of Plan	SE Comment/Modification	LBE response
<p>Policy SC2 Protecting and Enhancing Social and Community Infrastructure</p>	<p>To ensure the Plan is positively prepared and effective and therefore sound, NHSPS are seeking the following modification (<i>shown in italics</i>) to Part 1 of Draft Policy SC2.</p> <p>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:</p> <p>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;</p> <p>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;</p> <p>b. 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</p> <p>d.c. the opportunities to share the use of the existing site or co-locate services have been fully explored and are shown to be impractical;.</p>	<p>LBE notes the proposed modifications. These are not considered necessary for soundness, however if they are further proposed by the Inspector, LBE would be supportive of these modifications being made</p>

Policy/Section of Plan	SE Comment/Modification	LBE response
	<p>d. Where the building or site has been 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, Criteria a to c above will not apply.</p> <p>These changes would directly address the issues outline above to make the Plan precise and effective and therefore sound. The changes would ensure that the NHS is able to effectively manage its estate, disposing of unneeded and unsuitable properties where necessary, to enable healthcare needs to be met.</p>	
Comments on the Whole Plan Viability Assessment	<p>The draft policy requirements identified in the Plan are supported by Whole Plan Viability Update. Having reviewed the Update Report, we note that where contributions towards healthcare have been identified in the policy requirements for site-specific testing, the assessment does not include a specific allowance for contributions towards healthcare. The report tests a lump sum for S106 contributions related to the size of the development to cover site specific mitigation. This ranges from £2,500 per unit for 'small' schemes of 1-5 units, up to £9,000 per unit for 'very large' schemes of 250+ units. The Update Report includes the testing of the potential strategic sites, with a base assumption of £50,000 per unit (in addition to CIL) made.</p> <p>Without prejudice to any future representations the NHS or its partners may make on specific planning applications or applications for CIL funding, in our view the S106 headroom identified as part of the site-specific testing is generally sufficient to enable financial contributions to be secured for healthcare, and therefore we consider that overall the assessment of plan-wide viability demonstrates that policy requirements in relation to healthcare infrastructure contributions are deliverable. However, we are concerned that without explicit mention of required healthcare mitigation in the viability assessment, healthcare</p>	LBE notes the proposed modifications. These are not considered necessary for soundness, however if they are further proposed by the Inspector, LBE would be supportive of these modifications being made

Policy/Section of Plan	SE Comment/Modification	LBE response
	<p>mitigation will compete with other planning obligations or be ignored entirely, rendering development unsustainable and putting future residents' health at risk.</p> <p>As noted in our general comments above, healthcare facilities are currently experiencing significant strain. Furthermore, if appropriate mitigation is not secured, the growth strategy outlined in the Plan is expected to exacerbate this situation. We would recommend that the viability assessment includes a separate cost input for typologies where a healthcare contribution is expected. This would ensure that healthcare mitigation is appropriately weighted when evaluating the potential planning obligations necessary to mitigate the full impact of a development.</p> <p>A separate cost input for health would also mean that developers are adequately informed in advance, in accordance with ICB's estate strategy and the development's location and size, that they may be required to make on-site provision or off-site financial contributions to mitigate the impact on healthcare infrastructure resulting from their development. Such an approach would also support the effective implementation of Draft Policy D1 in situations when a viability assessment demonstrates that development proposals are unable to fund the full range of infrastructure requirements. We would welcome further engagement with the Council to on this issue to determine a reasonable cost assumption that could be used in future viability assessments.</p>	
Comments on the IDP	Draft Policy D1 states that all new 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.	LBE notes the proposed modifications. These are not considered necessary for soundness, however if they are further proposed by the Inspector, LBE would

Policy/Section of Plan	SE Comment/Modification	LBE response
	<p>NHSPS welcomes Part 3 and 5 of the Draft Policy which state development will be expected to provide or deliver on-site infrastructure provisions to meet the demands it generates, and 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. 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.</p> <p>As currently worded NHSPS considers Draft Policy D1 to be sound, but would request that the Council continue its engagement with the NHS to further refine the identified healthcare needs and proposed solutions to support the level of growth proposed by the Local Plan, as identified in the IDP, prior to submission. Further comments on IDP are provided below.</p> <p>Healthcare providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising from a new development. Where new developments create a demand for health services that cannot be supported by incremental extension or internal modification of existing facilities, this means the provision of new purpose-built healthcare infrastructure will be required to provide sustainable health services. Options should enable financial contributions, new-on-site healthcare infrastructure, free land/infrastructure/property, or a combination of these. It should be clarified that the NHS and its partners will need to work with the council in the formulation of appropriate mitigation measures.</p> <p><u>Comments on Emerging Infrastructure Delivery Plan (IDP) (2024) which supports Draft Policy D1</u></p>	<p>be supportive of these modifications being made</p>

Policy/Section of Plan	SE Comment/Modification	LBE response
	<p>The provision of adequate healthcare infrastructure is in our view critical to the delivery of sustainable development. A sound IDP must include sufficient detail to provide clarity around the healthcare infrastructure required to the level of growth proposed by the Plan, and to ensure that both planning obligations and the capital allocation process for the Community Infrastructure Levy (CIL) effectively support and result in capital funding towards delivery of the required infrastructure.</p> <p>We recommend that the Council add further detail to the approach regarding primary healthcare provision to ensure that the assessment of existing healthcare infrastructure is robust, and the mitigation options secured align with NHS requirements. We suggest the following process for determining the appropriate form of contribution for the provision of healthcare infrastructure associated with new development is included in the IDP:</p> <p>Proposed addition to Section 3 of the Infrastructure Delivery Plan relating to Healthcare Infrastructure:</p> <p><i>The requirement for a contribution towards healthcare infrastructure from new development will be determined by working with the ICB and other key stakeholders as appropriate, in accordance with the following process:</i></p> <ul style="list-style-type: none"> • <i>Assessing the level and type of demand generated by the proposal.</i> • <i>Working with the ICB to understand the capacity of existing healthcare infrastructure and the likely impact of the proposals on healthcare infrastructure capacity in the locality.</i> 	

Policy/Section of Plan	SE Comment/Modification	LBE response
	<ul style="list-style-type: none"><li data-bbox="622 279 1451 375">• <i>Identifying appropriate options to increase capacity to accommodate the additional service requirements and the associated capital costs of delivery.</i><li data-bbox="622 391 1451 422">• <i>Identifying the appropriate form of developer contributions.</i>	



STATEMENT OF COMMON GROUND

between

LONDON BOROUGH OF ENFIELD

and

SPORT ENGLAND

July 2024

1. This Statement of Common Ground (SoCG) has been prepared jointly between Lond Borough of Enfield Council (LBE) and Sport England (SE). SE are a government body responsible for growing ad developing grassroots sport and encouraging people to become more active across England. SE's role in the planning system is as a statutory and non-statutory consultee as set out in The Town and Country Planning (Development Management Procedure) (England) Order 2015 and in Government Planning Practice Guidance.
2. In relation to strategic planning matters, section 33A (1) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004) indicates that Local Planning Authorities have a duty to cooperate with bodies (or other persons) within subsection (9) and paragraphs (a), (b) and (c) of subsection (1), in section 33A(1) of the PCPA 2004.
3. This approach is also a requirement of national planning policy. Paragraph 35 of the National Planning Policy Framework (NPPF) seeks to ensure that the Local Plan is deliverable over the plan period and based on effective joint working on strategic matters that have been dealt with rather than deferred, as evidenced by this SoCG.
4. This SoCG sets out the confirmed points of agreement, or otherwise between the parties with regard to strategic planning matters arising from planning policy proposals in the emerging Enfield Local Plan (2019 – 2041), specifically in relation to the Council's Built Facilities Strategy and the Play Pitch Strategy (PPS).

Areas of Common Ground

- The Enfield Local Plan is based on the Council's existing PPS has been used to inform relevant parts of the Local Plan.

- Both Parties agree that the Council's recently developed Built Facilities Strategy (BFS) can and will be used to inform relevant parts of the Local Plan and this will also be used to interpret any future Policy changes where required.
- Both parties are committed to producing a new PPS (as per the email from Rebecca Raine to Bob Sharples dated 23rd July 2024), and once completed, it will be used to interpreted to any future Policy changes where required.
- All parties agree to continue to work together collaboratively on the Strategic Matters of the emerging Enfield Local Plan.

AGREEMENT

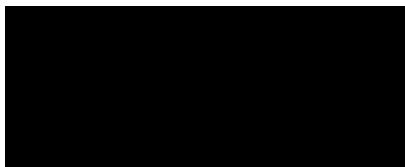
Signed on behalf of London Borough of Enfield



Brett Leahy - Director of Planning & Growth - Environment & Communities

Enfield Council

Dated: 23rd July 2024



Signed on behalf of Sport England

Bob Sharples RIBA ARB MRTPI

Principal Planning Manager - South Team Planning & Active Environments



STATEMENT OF COMMON GROUND
between
LONDON BOROUGH OF ENFIELD
and
Transport for London
August 2024

1. Introduction

- 1.1 The purpose of the Statement of Common Ground (SoCG) is to set out areas of common agreement between the London Borough of Enfield (LBE) and Transport for London and any areas of disagreement in relation to the emerging Enfield Local Plan 2019 – 2041, key strategic matters affecting the TLRN, London Underground, London Overground and London buses network.
- 1.2 In relation to strategic planning matters, section 33A (1) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004) indicates that Local Planning Authorities have a duty to cooperate with bodies (or other persons) within subsection (9) and paragraphs (a), (b) and (c) of subsection (1), in section 33A(1) of the PCPA 2004. This approach is also a requirement of national planning policy. Paragraph 35 of the National Planning Policy Framework seeks to ensure that the Local Plan is deliverable over the plan period and based on effective joint working on strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
- 1.3 The Duty to Cooperate was established in the Localism Act 2011. The Duty to Cooperate requires all Local Planning Authorities (LPAs), county councils and public bodies to engage constructively, actively and on an ongoing basis in relation to cross-boundary issues.
- 1.4 This SoCG acts as the framework for LBE delivery of duties and obligations under the Localism Act 2011 and accords with Paragraph 27 of the National Planning Policy Framework (NPPF – 2023) which requires LPAs to produce and publish one or more SoCGs. This is detailed further in the government's Planning Practice Guidance (PPG).

2. Background and Governance

2.1 LBE is the Local Planning Authority for its administrative area and Transport for London (TfL) is the integrated transport authority responsible for the implementation of the Mayor's Transport Strategy (2018). The Strategy aims to achieve an 80 per cent sustainable mode share target across London by 2041 and uses the 'Healthy Streets Approach' and Vision Zero, making public health and personal experience the priority in planning the city. The Healthy Streets Approach helps to create:

- Healthy streets and healthy people
- A good public transport experience
- New homes and jobs

2.2 The London boroughs are required to work with TfL to support the implementation of the Mayor's Transport Strategy. The London boroughs play a key role in the planning and delivery of schemes that transform local areas. The London boroughs are required by TfL to prepare a 3-year transport delivery programme (known as a Local Implementation Plan - LIP) setting out how each borough will meet the objectives of the Mayor's Transport Strategy. Subsequently TfL awards funding supporting the local initiatives identified in the LIP, covering corridors, neighbourhoods, cycle network development, bus priority, road and bridge maintenance.

2.3 TfL runs the day-to-day operation of the city's public transport network (including London Buses, London Underground and London Overground, Docklands Light Railway, TfL Rail and London Trams) and TLRN (Transport for London Road Network). Within Enfield TfL operates:

- TLRN - the A10 Great Cambridge Road and A406 North Circular.
- London Underground – Piccadilly Line and stations of Arnos Grove, Southgate, Oakwood, Cockfosters.
- London Overground - Weaver Line and stations of Silver Street, Edmonton Green, Bush Hill Park, Enfield Town, Southbury, Turkey Street.
- Buses – c 50 bus routes, coverage varies widely across the borough. Edmonton Green and Enfield Town centre have very good coverage with 12 routes serving the latter including services connecting to neighbouring London boroughs and a few services extending into Hertfordshire.

2.4 TfL is a statutory consultee and the GLA's advisor on transport planning matters. In support of the Local Plan, LBE and their technical consultants engaged with TfL, to prepare the draft Strategic Transport Assessment (STA) evidence which is a 'live' evidence base that needs continuous evolution to support the strategic transport approach, specifically for the strategic sites.

2.5 Furthermore, following Regulation 18 regular informal consultation and engagement has taken place with TfL to discuss the Chase Park and Crews Hill placemaking area allocations.

2.6 LBE have prepared a borough wide Transport Strategy and Infrastructure Development Plan (IDP) is being progressed to support the Local Plan delivery. These documents are intended as strategic 'live' evidence, to be regularly

reviewed, refined and updated as delivery of the Local Plan and related infrastructure, progress.

2.7 These documents, and forthcoming spatial planning development documents will build upon and provide more detailed guidance about strategic policies within the Local Plan, including transport matters.

2.8 TfL submitted a detailed representation as part of the Regulation 19 Local Plan Consultation (May 2024). This SoCG seeks to establish current areas of agreement and outstanding matters between LBE and TfL.

2.9 Section 4 outlines the outstanding matters where further work, discussion and engagement will be required. This will be recorded in an updated Statement of Common Ground as the examination progresses.

3. Agreed Matters

3.1 TfL and LBE are committed to supporting sustainable growth and enable sustainable travel in line with Mayor's Transport Strategy, TfL welcomes the approach set out in the draft Local Plan to reduce car use and encourage active travel in line with the Mayor's sustainable mode share targets for 2041, and to implement the Healthy Street Approach.

3.2 LBE will continue to work on the production of the Infrastructure Delivery Plan, the delivery strategies for both Crews Hill and Chase Park and any subsequent SPDs or Masterplans. This will be done in coordination with TfL to address concerns raised in the Regulation 19 response identified below in the outstanding matters.

3.3 Both parties agree that a coordinated masterplanning approach for the strategic sites (specifically Crews Hill and Chase Park) that focuses on appropriate residential densities (i.e. sufficiently high to support both the provision of public transport services and local amenities within walking or cycling distance), a restraint-based approach to car parking, and an emphasis on the infrastructure delivery upfront. It will furthermore need to be supported by a robust infrastructure delivery plan, a comprehensive cost plan and phasing plan to ensure sustainable transport measures are implemented.

4. Outstanding Matters

4.1 LBE notes that there are a number of outstanding issues that TfL has identified in the Regulation 19 representations. LBE will continue to work with TfL throughout the examination process and beyond to resolve these issues. The issues relate to:

- The approach to SS1 - Spatial Strategy
- The proposed amendments to Policy SP PL1 Enfield Town (and the agreement of any proposed modifications required).
- The outstanding issues/concerns to Policy SP PL9/SP PL11 Crews Hill and PL10 Chase Park.

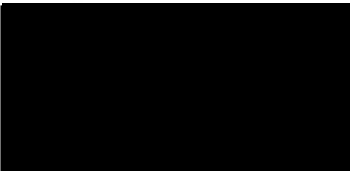
- An outstanding issue regarding the approach to SP HI Housing Development Sites
- An outstanding issue regarding the approach to SP E1 Employment and Growth.
- The proposed amendments to Policy SP TC2 Encouraging vibrant and resilient town centres (and the agreement of any proposed modifications required).
- The proposed amendments to Policy T3 A vibrant and safe Enfield for everyone (and the agreement of any proposed modifications required).
- The comments made in Appendix 2 of the TfL regulation 19 response (on the individual site allocations)

4.2 LBE particularly acknowledges TfL's significant concerns about the ability of the rural placemaking areas at Crews Hill and Chase Park to deliver genuinely sustainable neighbourhoods that would not be car dependent and would enable (financially) viable local bus services.

4.3 LBE will actively address these concerns up to and throughout the coming weeks and months as the plan progresses through examination, in consultation with TfL.

AGREEMENT

Signed on behalf of London Borough of Enfield



Brett Leahy - Director of Planning & Growth - Environment & Communities

Enfield Council

Dated: 01 August 2024

Signed on behalf of Transport for London



Josephine Vos

London Plan and Planning Obligations Manager | City Planning

Email: josephinevos@tfl.gov.uk

Dated: 1st August 2024

ENFIELD
Council



STATEMENT OF COMMON GROUND
between
LONDON BOROUGH OF ENFIELD
and
THAMES WATER UTILITIES LTD
July 2024

1. Introduction

- 1.1 This Statement of Common Ground has been prepared jointly between the London Borough of Enfield Council (LBE) and Thames Water Utilities Ltd (TW). TW are a specific consultation body for Local Plan consultation and are responsible for providing drinking water and sewage treatment in the Borough.
- 1.2 In relation to strategic planning matters, section 33A (1) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004) indicates that Local Planning Authorities have a duty to cooperate with bodies (or other persons) within subsection (9) and paragraphs (a), (b) and (c) of subsection (1), in section 33A(1) of the PCPA 2004.
- 1.3 This approach is also a requirement of national planning policy. Paragraph 35 of the National Planning Policy Framework seeks to ensure that the Local Plan is deliverable over the plan period and based on effective joint working on strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
- 1.4 The Duty to Cooperate was established in the Localism Act 2011. The Duty to Cooperate requires all Local Planning Authorities (LPAs) to engage constructively, actively and on an ongoing basis in relation to cross-boundary issues.
- 1.5 Both parties are prescribed bodies for the purposes of the Duty to Cooperate.
- 1.6 The purpose of a Statement of Common Ground is to set out the confirmed agreements and disagreements with regard to strategic and cross- boundary issues surrounding the Enfield Local Plan. This is the result of early, meaningful and continuous engagement between the Local Planning Authority and statutory consultees and key stakeholders in the Local Plan process.
- 1.7 This Statement of Common Ground reflects the current position between LBE Council and TW. It will be updated as and when required.
- 1.8 LBE Council and TW will continue to meet to discuss strategic planning matters as the Enfield Local Plan progresses to submission and examination. As a minimum, a meeting will take place prior to submission of the Enfield Local Plan for examination.

2. Matters

2.1 This SoCG sets out the confirmed points of agreement, or otherwise between the parties with regard to strategic planning matters arising from planning policy proposals in the emerging Enfield Local Plan (2019 – 2041).

2.2 TW commented on the pre-submission draft of the Enfield Local Plan (Regulation 19) May 2024, in relation to some site allocation policies and evidence base (Site Selection Methodology and Green Infrastructure Strategy) Such comments are the subject of ongoing discussions throughout the Examination process.

2.3 The following strategic Policy issues have been raised by TW, these include:

- Policy D3: Infrastructure and Phasing -relating to Wastewater/Sewerage and Water Supply Infrastructure;
- Policy SE2 Sustainable Design and Construction Water Efficiency/Sustainable Design;
- Policy SE7 Managing Flood Risk;
- Policy SE9 Sustainable Drainage Systems - Comments in Relation to Flood Risk and Sustainable Drainage Systems;
- Figure 3.6: Meridian Water Placemaking Plan;
- ALL Site Allocations – specific comments on water and sewerage infrastructure.

2.4 Appendix 1 provides the Council's response to these strategic and Policy comments.

3. Areas of Common Ground

3.1 Both parties agree that concerns raised regarding the proposed policies can be addressed through modifications.

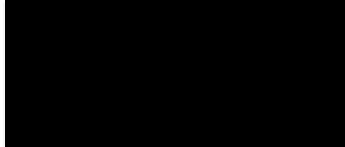
3.2 Both parties agree to continue to work together collaboratively on the Strategic Matters of the emerging Enfield Local Plan.

4. Outstanding Matters (Areas of Disagreement)

4.1 TW have made several proposed allocations and/ or omission sites. The Council will provide a response to these within a separate SoCG.

AGREEMENT

Signed on behalf of London Borough of Enfield



**Brett Leahy - Director of Planning & Growth - Environment & Communities
Enfield Council**

Dated: 30th July 2024

Signed on behalf of Thames Water Utilities Ltd



David Wilson, Thames Water Property Town Planner

Date 25/07/2024

Appendix 1: Council's response to TW's Policy comments		
Policy/paragraph	TW Response/proposed modifications	Council's Response
Policy D3: Infrastructure and Phasing - relating to Wastewater/Sewerage and Water Supply Infrastructure	<p><i>PROPOSED NEW WATER/WASTEWATER POLICY</i></p> <p><i>Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.</i></p> <p><i>The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development. The development or expansion of other water supply or waste water facilities will normally be permitted, either where</i></p>	<p><i>LBE support the proposed modifications by TW if these are agreed as necessary by the Inspector.</i></p>

Appendix 1: Council's response to TW's Policy comments		
Policy/paragraph	TW Response/proposed modifications	Council's Response
	<p><i>needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.</i></p> <p><i>When considering sensitive development, such as residential uses, close to a Sewage Treatment Works, a technical assessment should be undertaken by the developer or by the Council. The technical assessment should be undertaken in consultation with Thames Water. The technical assessment should confirm that either: (a) there is no adverse amenity impact on future occupiers of the proposed development or; (b) the development can be conditioned and mitigated to ensure that any potential for adverse amenity impact is avoided.</i></p>	
<p>Policy SE2 Sustainable Design and Construction Water Efficiency/Sustainable Design</p>	<p>Proposed policy text: <i>"Water Efficiency - Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be</i></p>	<p><i>LBE support the proposed modifications by TW if these are agreed as necessary by the Inspector.</i></p>

Appendix 1: Council's response to TW's Policy comments		
Policy/paragraph	TW Response/proposed modifications	Council's Response
	<p><i>expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the 'Fittings Approach' in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met."</i></p>	
<p>Policy SE7 Managing Flood Risk</p>	<p>The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".</p> <p>We therefore support the reference to sewer flooding in Policy SE7.</p> <p>When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract</p>	<p><i>LBE support the proposed modifications by TW if these are agreed as necessary by the Inspector.</i></p>

Appendix 1: Council's response to TW's Policy comments		
Policy/paragraph	TW Response/proposed modifications	Council's Response
	<p>water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.</p>	
<p>Policy SE9 Sustainable Drainage Systems - Comments in Relation to Flood Risk and Sustainable Drainage Systems</p>	<p>With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan <i>"It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."</i></p> <p>Also to mitigate flood risk both on and off-site: <i>"surface water drainage system discharge rates should be restricted to the equivalent Greenfield Qbar runoff rate or as close as practically possible, but never greater than 2 litres per second per hectare (2l/s/Ha)."</i> in line with CIRIA guidance.</p>	<p><i>LBE support the proposed modifications by TW if these are agreed as necessary by the Inspector.</i></p>

Appendix 1: Council's response to TW's Policy comments		
Policy/paragraph	TW Response/proposed modifications	Council's Response
Figure 3.6: Meridian Water Placemaking Plan	The Edmonton Marshes to the east of the Western Bank Area of Meridian Water are shown as flood risk mitigation and open space. The majority of this site was compulsorily purchased from Thames Water. The area contains strategic underground infrastructure including strategic water mains and sewers. The sale agreement contains protective provisions to protect these strategic underground infrastructure.	<i>LBE support the proposed modifications by TW if these are agreed as necessary by the Inspector.</i>
ALL Site Allocations – specific comments on water and sewerage infrastructure	Modifications- Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.	<i>LBE support the proposed modifications by TW if these are agreed as necessary by the Inspector.</i>



STATEMENT OF COMMON GROUND
between
LONDON BOROUGH OF ENFIELD
and
HISTORIC ENGLAND
August 2024

1. Introduction

- 1.1 The purpose of the Statement of Common Ground (SoCG) is to set out areas of common agreement between the London Borough of Enfield (LBE) and Historic England (HE) and any areas of disagreement in relation to the emerging Enfield Local Plan 2019 – 2041, key strategic matters affecting the natural environment.
- 1.2 In relation to strategic planning matters, section 33A (1) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004) indicates that Local Planning Authorities have a duty to cooperate with bodies (or other persons) within subsection (9) and paragraphs (a), (b) and (c) of subsection (1), in section 33A(1) of the PCPA 2004. This approach is also a requirement of national planning policy. Paragraph 35 of the National Planning Policy Framework seeks to ensure that the Local Plan is deliverable over the plan period and based on effective joint working on strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
- 1.3 The Duty to Cooperate was established in the Localism Act 2011. The Duty to Cooperate requires all Local Planning Authorities (LPAs), county councils and public bodies such as Historic England to engage constructively, actively and on an ongoing basis in relation to cross-boundary issues.
- 1.4 This Statement of Common Ground (SoCG) acts as the framework for LBE delivery of duties and obligations under the Localism Act 2011 and accords with Paragraph 27 of the National Planning Policy Framework (NPPF – 2023) which requires LPAs to produce and publish one or more Statements of Common Ground. This is detailed further in the government's Planning Practice Guidance (PPG).
- 1.5 This SoCG covers the Local Planning Authority area of the London Borough of Enfield.
- 1.6 LBE have provided a response next to HE responses in Appendix A-C.

2. Matters

- 2.1 This SoCG sets out the confirmed points of agreement, or otherwise between the parties with regard to strategic planning matters arising from planning policy proposals in the emerging Enfield Local Plan (2019 – 2041). The agreed matters are:
- Policy SS2
 - Policy PL1 Enfield Town
 - Policy PL3 Edmonton Green
 - Policy PL6 Southgate

- Policy PL8 Palmers Green
- Policy PL10 Chase Park
- Policy DE4 Putting Heritage at the Centre of Placemaking
- Policy DE6 Tall Buildings (See Appendix A)
- Policy DE10 Conserving and Enhancing Heritage Assets
- Appendix C: Site Allocations (See Appendix B)
- Evidence Base (Character of Growth)
- Appendix D: Tall Buildings (See Appendix B)

3. Areas of Common Ground

- 3.1 Both parties agree that the Spatial Strategy (SS2 Making Good Places) will help deliver contextually successful new development.
- 3.2 Both parties agree DE1 Delivering a Well Designed, High Quality and Resilient Environment will help deliver contextually successful new development.
- 3.3 Both Parties agree that the Council's recently developed Character of Growth Study forms part of the Council's appropriate and proportionate evidence base.
- 3.4 Both parties agree that the principal matter is Policy DE6 Tall buildings.
- 3.5 Both parties agree that DE6 creates clarity over the areas where tall buildings are acceptable in principal and the maximum height that is acceptable in design term.
- 3.6 Both parties agree that this evidence is sufficient to support the Local Plan policies.
- 3.7 Both parties agree that if the Council make the required modifications to the content of the Plan (as per appendixes below) this would satisfy HE's concerns regarding the Local Plan.
- 3.8 All parties agree to continue to work together collaboratively on the Strategic Matters of the emerging Enfield Local Plan.

4. Outstanding Matters (Areas of Disagreement)

- 4.1 LBE Council will engage with HE in relation to their suggested modifications outlined in Appendix A: Historic England's concerns regarding Character of Growth Study and Evidence Base, but the Council believe that these changes are not necessary for soundness.

Appendix A: A full breakdown of Historic England’s response to the Enfield Local Plan Publication Draft consultation and LBE’s response to these concerns.

Ref.	Policy/Section of Plan	Historic England Comment	LBE response
001	Policy SS2 clause 4d	The requirement for development proposals to ‘promote and support’ heritage assets is ambiguous and does not relate specifically, to legislative and national policy requirements in relation to the historic environment.	<p>LBE notes the proposed modifications. These are not considered necessary for soundness, however if they are further proposed by the Inspector, LBE would be supportive of these modifications being made.</p> <p>See below for potential modification:</p> <p><i>d: conserve and enhance the significance of the Borough’s historic environment and cultural assets,</i></p>
002	Policy PL1 Enfield Town	The area in question contains a substantial number of designated heritage assets and its historic character and significance is sensitive to change. The policy should contain further text to ensure that development proposals have appropriate regard to its conservation.	<p>LBE notes the proposed modifications. These are not considered necessary for soundness, however if they are further proposed by the Inspector, LBE would be supportive of these modifications being made.</p> <p>See below for potential modification:</p> <p><i>4: must demonstrate how they</i></p>

Ref.	Policy/Section of Plan	Historic England Comment	LBE response
			<p>have facilitated enhancements ...</p> <p><i>New clause 5: should demonstrate how they have paid appropriate regard to the Enfield Town conservation area appraisal and management proposals.</i></p>
003	Policy PL3 Edmonton Green	<p>The placemaking area either contains or is adjacent to three separate conservation areas, none of which are referenced in the context and characteristics section or vision for the area.</p> <p>Given the scale of growth envisaged for the area, such historic character needs to be referenced in policy to ensure new development reflects its context.</p>	<p>LBE note the comments and concerns, and welcome discussion on these modifications at examination.</p> <p>LBE believe, we have covered already sufficiently addressed the concern in paragraph 5 as below.</p> <p>PL3(5): <i>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.</i></p>

Ref.	Policy/Section of Plan	Historic England Comment	LBE response
004	Policy PL6 Southgate	We welcome the text in clause 2 that requires new development to preserve key views of the Grade II* listed tube station. The policy should also ensure appropriate conservation of a highly important heritage asset through reference to significance.	<p>LBE notes the proposed modifications. These are not considered necessary for soundness, however if they are further proposed by the Inspector, LBE would be supportive of these modifications being made.</p> <p>See below for potential modification:</p> <p>2. ... development that preserves <i>and enhances the significance of the station, including key views.</i></p>
005	Policy PL8 Palmers Green	The policy should include an objective relating to the removal of Broomfield Park from the Heritage at Risk register to ensure consistency with policies elsewhere (e.g. Policy PL3 Edmonton Green).	<p>LBE notes the proposed modifications. These are not considered necessary for soundness, however if they are further proposed by the Inspector, LBE would be supportive of these modifications being made.</p> <p>See below for potential modification:</p> <p><i>New paragraph: Proposals in the area will be expected to contribute to removing the Registered Park and Garden, Broomfield Park from the Historic</i></p>

Ref.	Policy/Section of Plan	Historic England Comment	LBE response
			<i>England register of Heritage at Risk.</i>
006	Policy PL10 Chase Park	It is clear that intensification of use of green space will follow from the proposed development, including that of Trent Park, which is both a conservation area and a registered park and garden. Contributions towards a management plan for the park should be required so that this increased use can be planned for and mitigated.	<p>LBE notes the proposed modifications. These are not considered necessary for soundness given Policy DE10(7g) will ensure S106 contributions are made where harm to an RPG (or its setting) cannot be minimised or otherwise mitigated. However, if they are further proposed by the Inspector, LBE request the wording is broadened to allow for greater flexibility. Suggested wording:</p> <p>See below for potential modification:</p> <p><i>Development across the Chase Park Placemaking Area must consider the impact of increased use upon the Trent Park Registered Park and Garden and embed appropriate mitigation. At a minimum, development must contribute towards the conservation enhancement and</i></p>

Ref.	Policy/Section of Plan	Historic England Comment	LBE response
			<i>ongoing maintenance of the Trent Park Registered Park and Garden through financial contributions towards the positive management of the heritage asset.</i>
007	Policy DE4 Putting Heritage at the Centre of Placemaking	We acknowledge the strategic nature of this policy and its relationship with policy DE10 which adds further detail. However, the NPPF requirements of the strategic policy for heritage (para 20) are wider than just place-making, we would suggest a further clause to add detail in relation to heritage significance.	<p>LBE notes the proposed modifications. These are not considered necessary for soundness, however if they are further proposed by the Inspector, LBE would be supportive of these modifications being made.</p> <p>See below for potential modification:</p> <p><i>New clause a: to ensure a significance-based approach to the management of the historic environment and seek to preserve or enhance the significance of both designated and non-designated heritage assets.</i></p>

Ref.	Policy/Section of Plan	Historic England Comment	LBE response
008	Policy DE6 Tall Buildings	<p>This creates clarity over the locations and heights of tall buildings. However, clause 9 states that some of these locations are 'likely to result in harm to heritage assets'.</p> <p>Historic England objects to this wording, which suggests that there would be an acceptable level of harm with regard to heritage assets. Having a statement in policy where it is clear that an acceptable (yet undefined) level of harm is expected is in conflict with the NPPF, which sets out that heritage assets are an irreplaceable resource with any harm or loss requiring clear and convincing justification (para 206).</p>	<p>LBE notes the proposed modifications. These are not considered necessary for soundness, however if they are further proposed by the Inspector, LBE would be supportive of these modifications being made.</p> <p>See below for potential modification:</p> <p>2. Figure 7.4 identifies areas where tall buildings <i>may be appropriate subject to satisfying all other relevant requirements in the Plan, including those in relation to the historic environment</i>. Tall buildings should only be developed in these areas.</p>
009	Policy DE6 Tall Buildings	<p>The policy should be amended to remove the reference to 'likely harm', make clear tall building proposals must take appropriate account of any impacts on heritage assets (including conservation areas) and to include a caveat that such proposals in identified tall building areas will only be acceptable if they satisfy the requirements of the Plan as a whole.</p>	<p>LBE notes the proposed modifications. These are not considered necessary for soundness, however if they are further proposed by the Inspector, LBE would be supportive of these modifications being made.</p> <p>The potential modification proposed by HE is below:</p>

Ref.	Policy/Section of Plan	Historic England Comment	LBE response
			9. Replace with: <i>Tall building proposals must demonstrate how they have preserved and enhanced the significance of any affected heritage assets, including any contribution made by their setting.</i>
010	Policy DE6 Tall Buildings	Delete clause 10	<p>LBE notes the proposed modifications. These are not considered necessary for soundness, however if they are further proposed by the Inspector, LBE would be supportive of these modifications being made.</p> <p>See below for potential modification:</p> <p>Delete clause 10 – duplication of policy D9 in the London Plan.</p>
011	Policy DE10 Conserving and Enhancing Heritage Assets	We support the intention behind clause 11 to secure heritage benefits in particular circumstances. However, and in a similar vein with our comments in relation to DE6, we consider that clause 11 also infers that an undefined adverse impact on heritage assets would be acceptable as long as a Section 106 agreement can be secured. This is potentially problematic and may encourage harmful development proposals to come forward. Our suggested amendment is intended to make clear that such a scenario would be rare.	<p>LBE notes the proposed modifications. These are not considered necessary for soundness, however if they are further proposed by the Inspector, LBE would be supportive of these modifications being made.</p> <p>See below for potential modification:</p>

Ref.	Policy/Section of Plan	Historic England Comment	LBE response
			<p>11. Proposals affecting heritage assets <i>should</i> secure opportunities to conserve, enhance or better reveal heritage significance through Section 106 agreements <i>in exceptional circumstances</i> where harm cannot be minimised or otherwise mitigated.</p>

Appendix B: Historic England's concerns regarding the Allocations and LBE responses

Ref.	Site Allocation	Historic England Comment	LBE Response
012	1.1 Palace Gardens Shopping Centre	<p>Add new bullet point M:</p> <p>Must demonstrate how it has responded to the significance of any potentially affected heritage assets and pay appropriate regard to the guidance within the Character of Growth study, relevant conservation area appraisals and conservation area management plans.</p>	<p>LBE notes the proposed modifications. These are not considered necessary for soundness, however if they are further proposed by the Inspector, LBE would be supportive of these modifications being made.</p> <p>See below for potential modification:</p> <p><i>M: Must demonstrate how it has responded to the significance of any potentially affected heritage assets and pay appropriate regard to the guidance within the Character of Growth study, relevant conservation area appraisals and conservation area management plans.</i></p>
013	1.2 Enfield Town Station	<p>Add new bullet point K:</p> <p>Must demonstrate how it has responded to the significance of any potentially affected heritage assets</p>	<p>LBE notes the proposed modifications. These are not considered necessary for soundness, however if they are further proposed by the Inspector, LBE would be supportive of these modifications being made.</p>

Ref.	Site Allocation	Historic England Comment	LBE Response
			<p>See below for potential modification:</p> <p><i>K: Must demonstrate how it has responded to the significance of any potentially affected heritage assets.</i></p>
014	3.1 Edmonton Green Shopping Centre	Amend bullet point J: Must carefully consider its impact, notably through the placement of taller buildings, and demonstrate how it has responded to the historic character of surrounding conservation areas, taking account of the Character of Growth study and relevant guidance in conservation area appraisals and management plans.	<p>LBE notes the proposed modifications. These are not considered necessary for soundness, however if they are further proposed by the Inspector, LBE would be supportive of these modifications being made.</p> <p>See below for potential modification:</p> <p><i>J: Must carefully consider its impact, notably through the placement of taller buildings, and demonstrate how it has responded to the historic character of surrounding conservation areas, taking account of the Character of Growth study and relevant guidance in conservation area appraisals and management plans.</i></p>

Ref.	Site Allocation	Historic England Comment	LBE Response
015	6.1 Southgate Office Village	Add at end of bullet point G: '.... Southgate Circus conservation area and respond appropriately to the guidance within the Character of Growth study'.	<p>LBE notes the proposed modifications. These are not considered necessary for soundness, however if they are further proposed by the Inspector, LBE would be supportive of these modifications being made.</p> <p>See below for potential modification:</p> <p><i>G: Southgate Circus conservation area and respond appropriately to the guidance within the Character of Growth study.</i></p>
016	8.1 Morrisons Palmers Green	<p>Add new bullet point P:</p> <p>Must demonstrate how it has responded to the significance of any potentially affected heritage assets and pay appropriate regard to the guidance within the Character of Growth study, relevant conservation area appraisals and conservation area management plans.</p>	<p>LBE notes the proposed modifications. These are not considered necessary for soundness, however if they are further proposed by the Inspector, LBE would be supportive of these modifications being made.</p> <p>See below for potential modification:</p> <p><i>P: Must demonstrate how it has responded to the significance of any potentially affected heritage</i></p>

Ref.	Site Allocation	Historic England Comment	LBE Response
			<p><i>assets and pay appropriate regard to the guidance within the Character of Growth study, relevant conservation area appraisals and conservation area management plans.</i></p>
017	URB 02 Cockfosters Station Car Park	<p>Add at end of bullet point I</p> <p>' .. and should demonstrate how it has responded to and taken account of the significance of the listed tube station'.</p>	<p>LBE notes the proposed modifications. These are not considered necessary for soundness, however if they are further proposed by the Inspector, LBE would be supportive of these modifications being made.</p> <p>See below for potential modification:</p> <p><i>I .. and should demonstrate how it has responded to and taken account of the significance of the listed tube station.</i></p>
018	URB 06 Trent Park	<p>This allocation needs a full reference to the various designated heritage assets within the boundary together with further detail as to how the heritage significance of each must be taken account of during the development of any proposals.</p>	<p>LBE note the comments and concerns, and welcome discussion on these modifications at examination.</p> <p>In 2016 permission was granted for the construction of 262 dwelling within this site allocation (16/04324/FUL). Following</p>

Ref.	Site Allocation	Historic England Comment	LBE Response
			<p>numerous applications to amend this scheme, the development will now deliver a total of 249 dwellings with completion expected in Autumn 2024. This matches the approximate estimated housing capacity (249) within the allocation. This scheme is being delivered and has undergone full engagement with HE and the local planning authority making detailed reference unnecessary.</p>
019	Overall Comments	<p>We welcome the identification of relevant heritage considerations on page 1 of each of the site allocation proformas. However, given the heritage sensitivities in relation to a number of the broad locations for the draft site allocations, we consider that further detail is necessary in the design principles section.</p>	<p>LBE note the comments and concerns, and welcome discussion on these modifications at examination.</p> <p>Historic England comment: if proposed modifications to draft site allocation policies proposed by HE (and detailed elsewhere in this SoCG) are agreed and taken forward, then this issue is</p>

Ref.	Site Allocation	Historic England Comment	LBE Response
			resolved and HE comment can be disregarded.
020	Overall Comments	We note that there are a number of proposed site allocations that where development proposals come forward would trigger a consultation with the Greater London Archaeological Advisory Service (GLAAS). For clarity and to make clear this requirement, we would suggest including a link to the GLAAS charter and to include at the start of Appendix C	<p>LBE notes the proposed modifications. These are not considered necessary for soundness, however if they are further proposed by the Inspector, LBE would be supportive of these modifications being made.</p> <p>Add new sentence at end of para 7.36:</p> <p>‘Certain development proposals are likely to require consultation with GLAAS. Further details can be found at Our Advice Historic England</p>
021	Overall Comments	It is not clear what green, amber and red colours in the heritage considerations box on each pro forma refers to.	<p>LBE notes the proposed modifications. These are not considered necessary for soundness, however if they are further proposed by the Inspector, LBE would be supportive of these modifications being made.</p> <p>Potential modification:</p>

Ref.	Site Allocation	Historic England Comment	LBE Response
			An explanation at the beginning of the appendix can be added to provide clarity.

Appendix C: Historic England's concerns regarding Character of Growth Study and Evidence Base

Ref.	Site Allocation	Historic England Comment	LBE Response
022	Area 002, Enfield Town	<p>We would suggest that additional views are considered in the context of Gentlemen's Row, which contains a very important group of listed buildings representing some of the earliest development of Enfield Town.</p> <p>Many of the current views face west or are located close to the southern side of the gardens. We would recommend further views are considered particularly looking east and southeast from the gardens and the upper section of Gentlemen's Row, showing the potential impact on the skyline over the rooftops of the listed buildings resulting from potential development of Palace Gardens and the Enfield Civic Centre. It should be noted that the viewing positions/directions given in this document will guide the scope of any visuals supporting future applications for development, so it will need to fully illustrate the potential visual impacts on heritage assets.</p>	<p>LBE note the comments and concerns, and welcome discussion on these modifications at examination.</p> <p>LBE cannot modify the evidence as part of the submission of the Local Plan. However, we have appended additional views as requested which both parties agree illustrate how site allocations SA1.1, SA1.2 and SA1.4 may have impacts on the setting of a number of designated heritage assets, including Enfield Town conservation area and the listed buildings along Gentleman's Row.</p>

Ref.	Site Allocation	Historic England Comment	LBE Response
			<p>HE potential modification:</p> <p>These additional views to be included in the Enfield Town appendix to the Character of Growth Study, and following amendments to each site allocation:</p> <p>SA1.1 – new clause M: Should take particular care to avoid adverse impacts on the Enfield Town conservation area and the setting of the numerous listed buildings on Gentleman’s Row</p> <p>SA1.2 – add to clause G: ‘...affect the setting of the adjacent Enfield Town conservation area and the listed buildings along Gentleman’s Row</p> <p>SA1.4 – add to clause I: ‘... from the Enfield Town conservation area has been considered and minimised, including effects on the setting of the listed buildings on Gentleman’s Row</p>

Ref.	Site Allocation	Historic England Comment	LBE Response
			<p>Please refer to “Enfield Town Additional Views 1-5” in the appendix.</p> <p>LBE notes the proposed modifications. These are not considered necessary for soundness, however if they are further proposed by the Inspector, LBE would be supportive of these modifications being made</p>
023	Area 006, Southgate	<p>Views need to be considered from the terrace outside the café within the Grade II* Registered Park and Garden of Grovelands Park. This raised area affords significant views looking west over the park and of the Grade I listed Nash villa. These views are an integral part of the significance of both heritage assets. We would be likely to object to any development that appears in those views.</p>	<p>LBE note the comments and concerns, and welcome discussion on these modifications at examination.</p> <p>LBE cannot modify the evidence as part of the submission of the Local Plan. However, we have appended additional views as requested which both parties agree resolve concern.</p> <p>Please refer to “Southgate Additional View 1” in the appendix. These additional views to be included a further appendix to the Character of Growth Study.</p>

Ref.	Site Allocation	Historic England Comment	LBE Response
024	Area 007, New Southgate	<p>The projection of new development over the rooftop silhouette of the former Friern Hospital is considered harmful to its architectural significance and setting. This is a well composed expansive and symmetrical composition. Details can be found at: https://historicengland.org.uk/listing/the-list/list-entry/1078848.</p>	<p>We have carefully considered views featuring Friern Hospital listed buildings as part of the Character of Growth study which are discussed in the evidence base in <u>appendix 7, part 1 and 2</u>.</p> <p>HE make the following modification proposal:</p> <p>In order to better reflect the analysis carried out as part of the Character of Growth study, amend the final sentence of paragraph 3.90 to read: All proposals for tall buildings <i>should avoid harmful impacts to heritage assets in the neighbouring borough as per the analysis in the Character of Growth Study, and</i> will also have to comply with relevant Local Plan and London Plan policies.</p> <p>LBE notes the proposed modifications. These are not considered necessary for soundness, however if they are further proposed by the Inspector,</p>

Ref.	Site Allocation	Historic England Comment	LBE Response
			LBE would be supportive of these modifications being made.

AGREEMENT

Signed on behalf of London Borough of Enfield

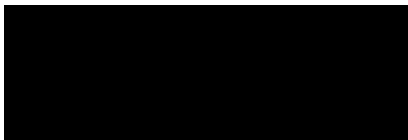


Brett Leahy - Director of Planning & Growth - Environment & Communities

Enfield Council

Dated: 01 August 2024

Signed on behalf of Historic England



Tim Brennan – Historic Environment Planning Adviser, London & South East Region, Historic England

Dated: 1.8.24



Camera Location [530778, 57, 194233] Bearing 279° Pitch -2° Focal Length 25mm 21/06/2022 16:00

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Camera Location [532425, 32, 196798] Bearing 130° Pitch 2° Focal Length 24mm 21/06/2022 16:00

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Camera Location [532368, 34, 196737] Bearing 86° Pitch -1° Focal Length 24mm 21/06/2022 16:00

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STATEMENT OF COMMON GROUND
between
LONDON BOROUGH OF ENFIELD
and
NATIONAL HIGHWAYS
JULY 2024

1. Introduction

- 1.1 The purpose of the Statement of Common Ground (SoCG) is to set out areas of common agreement between the London Borough of Enfield (LBE) and National Highways and any areas of disagreement in relation to the emerging Enfield Local Plan 2019 – 2041, key strategic matters affecting the natural environment.
- 1.2 In relation to strategic planning matters, section 33A (1) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004) indicates that Local Planning Authorities have a duty to cooperate with bodies (or other persons) within subsection (9) and paragraphs (a), (b) and (c) of subsection (1), in section 33A(1) of the PCPA 2004. This approach is also a requirement of national planning policy. Paragraph 35 of the National Planning Policy Framework seeks to ensure that the Local Plan is deliverable over the plan period and based on effective joint working on strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
- 1.3 The Duty to Cooperate was established in the Localism Act 2011. The Duty to Cooperate requires all Local Planning Authorities (LPAs), county councils and public bodies such as National Highways to engage constructively, actively and on an ongoing basis in relation to cross-boundary issues.
- 1.4 This Statement of Common Ground acts as the framework for LBE delivery of duties and obligations under the Localism Act 2011 and accords with

1.5 Paragraph 27 of the National Planning Policy Framework (NPPF – 2023) which requires LPAs to produce and publish one or more Statements of Common Ground. This is detailed further in the government's Planning Practice Guidance (PPG).

1.6 This Statement of Common Ground (SoCG) covers the Local Planning Authority area of the London Borough of Enfield.

2. Background and Governance

2.1 National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority, and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and, as such, National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs, as well as in providing effective stewardship of its long-term operation and integrity.

2.2 The closest SRN network, the M25 runs east-west along the northern edge of the borough. LBE and National Highways have reviewed the locations where safe, reliable, and efficient operation of the SRN might be affected by the Local Plan proposals. This is focused on the connections of the Local Road Network (LRN) and the SRN, namely junctions 24 and 25 of the M25.

2.3 National Highways have recently upgraded junction 25 of the M25 (completed September 2022), and in the 5-year Delivery Plan 2020-2025 there are no future upgrades of the strategic road network (SRN) within, or in proximity of, LBE.

2.4 National Highways is a key strategic partner in the preparation of the emerging Enfield Local Plan. LBE communicates regularly with National Highways in relation to the preparation of the emerging Local Plan and National Highways' Route Strategies. Route strategies are a rolling programme setting out our plan for the strategic road network (SRN). They're a key research element underpinning the Road Investment Strategy (RIS), which informs the process of future road investment.

2.5 As part of the Local Plan engagement, key studies have been shared and discussed during the Local Plan preparation process in line with duty to co-operate guidelines. A particular focus of the engagement has been given to the agreement of the transport capacity assessment, ensuring the tools and assumptions underpinning the technical evidence presented were agreed with National Highways at each step of the assessment process.

2.6 Initial modelling outputs indicated some delays that would “*ordinarily require some form of mitigation in line with the Circular 01/22 requirement to future proof the network.*” Following more detailed review of the modelling assumptions and the potential impact further evidence was presented indicating that a marginal delay and increase in queues was likely leading to nil detriment effects from the Local Plan at junction 25.

3. Agreed Matters

3.1 Both parties agree to continue to collaborate on all key evidence base studies when required to resolve strategic matters relating to the SRN.

4. Areas of Common Ground

4.1 Both parties agree that they have a positive working relationship and a track record of joint working in partnership projects. Both agree to continue to work together collaboratively on the Strategic Matters of the emerging Enfield Local Plan.

4.2 Both parties agree that the Local Plan technical evidence indicates that the Local Plan is not adding significantly to the M25, and both junctions 24 and 25 experience some delay at present and will continue to do so in the future, with or without the Local Plan.

4.3 Both Parties agree to continue monitoring junctions 24 and 25, and LBE agrees to pursue sustainable travel and demand management type approach to the Crews Hill and Chase Park allocations areas, in an effort to prevent significant highway demand arising from these areas in future.

4.4 Both parties agree to continue working on identifying how the Enfield Local Plan responds to the DfT Circular 1/22 that sets out the National Highways expectations for active and sustainable travel relating to development sites within an emerging local plan.

5. Outstanding Matters

5.1 National Highways are currently in discussions with Enfield around the impact of the Local Plan at M25 Junction 24, specifically the signalised arms between the M25 Junction 24 eastbound off slip and the circulatory arm of the roundabout. A meeting has been requested by Enfield in early August (further to the email sent on 29th July 2024) to agree the mitigation proposed. It is hoped that this will resolve the outstanding issues.

AGREEMENT

Signed on behalf of London Borough of Enfield



Brett Leahy - Director of Planning & Growth - Environment & Communities

Enfield Council

Dated: 01 August 2024

Signed on behalf of National Highways



Janice Burgess – Spatial Planner

Dated: 30 July 2024