



STATEMENT OF COMMON GROUND
between
LONDON BOROUGH OF ENFIELD
and
NATURAL ENGLAND
January 2025

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. This SoCG should be read alongside the previous statement set out with examination document [SUB14a].
- 1.2 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 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 – in relation to Air Quality and recreational impact / pressure.

2.3 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.

2.4 Both parties have a good working relationship and agree to continue to collaborate on all key evidence base studies when required to resolve strategic matters relating to the natural environment.

3. Matters of Discussion

Epping Forest Special Area of Conservation

3.1 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.

3.2 Land Use Consultants (LUC) on behalf of Enfield Council, undertook a desk study to identify the habitats likely to be affected by the predicted significant increases in air pollution. This concluded that there would be no adverse effects on the integrity of the SAC as some of the areas affected are not sensitive to the pollutants predicted to increase, and only a very small area of the SAC's qualifying habitats would be affected. This was written up in an Appropriate Assessment note shared with Natural England on 27 February 2024.

3.3 Natural England provided their comments on the note during a meeting on 21 March 2024. While they were broadly happy with the approach taken, they requested further work to update the justification provided in relation to acid deposition and to include some additional transect locations in the study, where the Local Plan contributed a relatively large proportion of the in-combination exceedance.

- 3.4 On 19 April 2024, another meeting was held with Natural England to agree changes to the traffic and air quality modelling methodology proposed by WSP. The changes related to assumptions underpinning the model, to account for: latest ULEZ data, TfL fleet data, covid impacts, and to make assumptions about major sites at Crews Hill and Chase Park more realistic. Natural England agreed to the proposed changes. These changes to the methodology reduced the number of locations in which the 1% screening threshold was predicted to be exceeded.
- 3.5 In June and July 2024, LUC carried out ecological site visits to provide further information on whether the qualifying habitats of the SAC are present in the areas affected by predicted increases in air pollution. LUC updated the Appropriate Assessment note to reflect the changes to WSP's model, Natural England's comments on the previous version of the note, and the site visit findings; this was issued on 21 August 2024. In response, by email on 3 September 2024, Natural England confirmed that they were *"broadly in agreement with the conclusion that there would be no adverse effects on the integrity of the SAC from the Local Plan"* but that they disagreed with how the in-combination conclusions had been presented.
- 3.6 LUC updated the note following Natural England's comments and reissued the note on 15 October 2024. Natural England responded by email on 17 October 2024 to say, *"we are happy with the revised conclusions as they are now presented"*.
- 3.7 The Appropriate Assessment note is appended to the Council's Matters Issues and Questions response [E7] and specifically referenced as [SUB14h].
- Recreation pressure and Mitigation
- 3.8 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. Paragraph 5.44 of the HRA states 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. This has been confirmed.

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.
- 4.2 Both agree to continue to work together collaboratively on the Strategic Matters of the emerging Enfield Local Plan.
- 4.3 Natural England has approved the SANG Strategy for the Regulation 19 Plan.

4.4 Natural England have approved the Appropriate Assessment note in relation to Air Quality.

4.5 Enfield Council will need to update the Recreational Mitigation strategy in relation to any changes to site allocations proposed through main modifications. If changes are proposed, Natural England will be consulted as agreed.

5. Outstanding Matters

5.1 There are no outstanding matters.

AGREEMENT

Signed on behalf of London Borough of Enfield

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

Dated:

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.

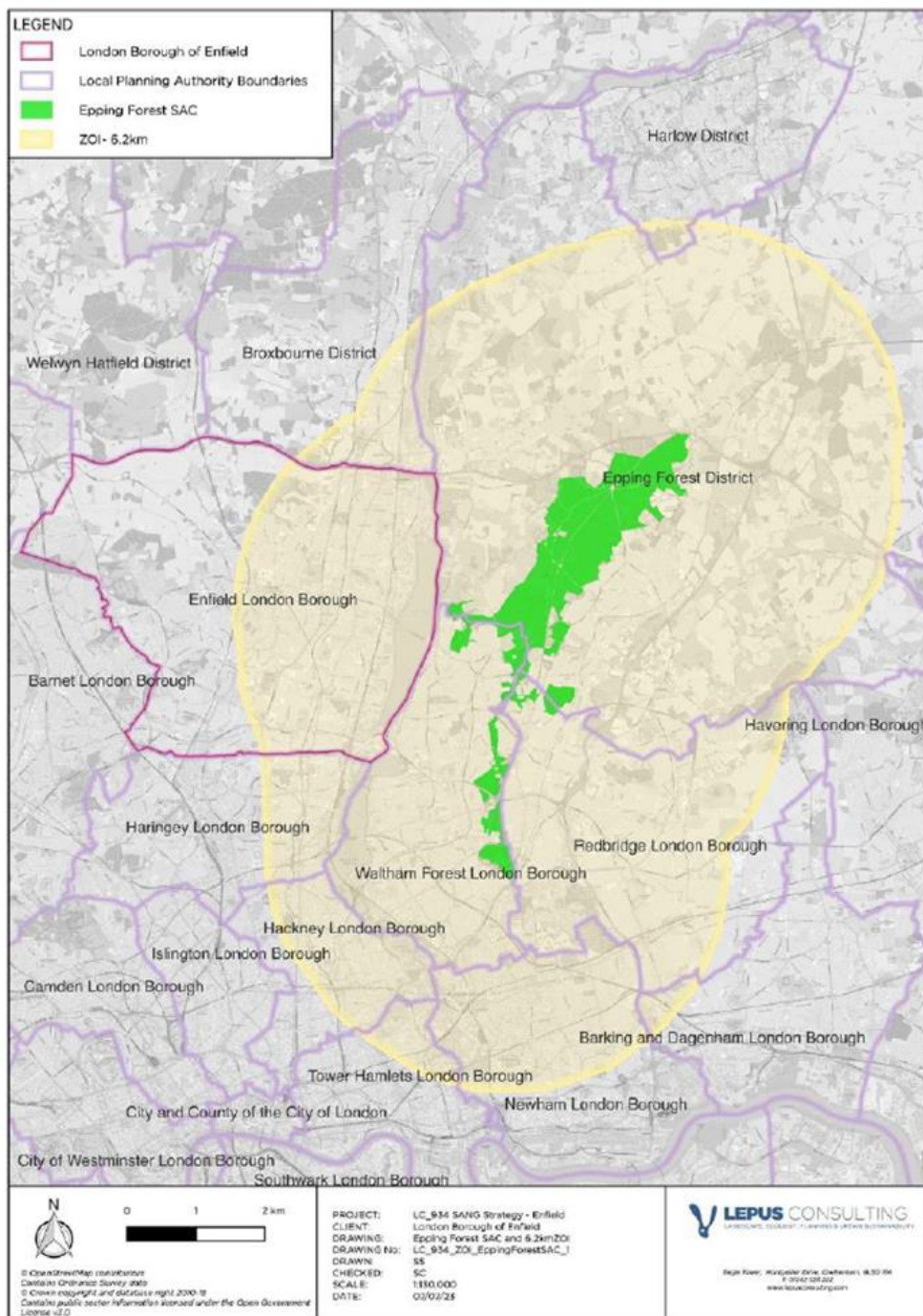


Figure 3.2: Epping Forest SAC Zone of Influence (based on 2017 visitor survey data)