



**Enfield Local Plan Examination January 2025
Written Statement Matter 1
Legal, procedural and other general matters**

Savills on behalf of Comer Homes

**Written Statement Matter 1
Legal, procedural and other general matters**

Issue 1.6: Other Matters

Although there are no specific questions in relation to BNG within the Inspectors Matters, Issues and Questions, we note that questions were raised within preliminary questions and these are addressed within the Council's response to Inspector's Pre-liminary Questions (paragraphs 105-115).

We note the conclusion that the impact of BNG on viability is considered to be limited. We support acknowledgement that *'as with any plan policy, the policy wording would be applied subject to viability'*, however, we remain concerned about reference to a blanket target of 20% BNG and are not convinced this is justified, will lead to ambiguity and stymie development.

The Government requirement is that developments (unless exempt) should deliver a minimum of 10% biodiversity net gain. This should therefore be the starting point. This criteria should therefore be reworded to refer to a minimum of 10% and a target of 20%. In principle we agree that the ideal scenario would be to work towards 20%, however, this needs to be deliverable in practice and we are not convinced that this can be realistically achieved, particularly on greenfield sites.

As set out above 20% is not the standard approach and is double the 10% statutory objective. The Government's Planning Policy Practice Guidance (PPG) states that:

'Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented.'

In its response to PQ54 (Enfield Council's response to Inspector's IN1 Document 29 November Document Reference E5), the Council states that *'in many case, previously developed sites, where they do not contain vacant urban mosaic habitats, are unlikely to have high net gain requirements, and the cost associated with this is likely to be limited.'* This is misleading and does not reflect the full picture. It certainly does not apply to the Chase Park Placemaking Allocation (which is not previously developed land) and 20% BNG on greenfield land is exceptionally challenging. It is important to highlight that the Chase Park Placemaking Policy PL10 Part 13 k. also states that proposals must deliver a minimum of 20% biodiversity net gain in alignment with the biodiversity net gain strategy. This is not justified.

For the reasons set out above, setting a 20% minimum target is therefore unjustified and too rigid and will place a significant constraint on greenfield sites, including Chase Park.

We therefore propose that 10% is a minimum requirement and 20% is a target – this should also be reflected within Policy PL10 Part 13 k.