



Date: 08 September 2021

Dear Sirs

Representations on the Draft Enfield Local Plan: Main Issues and preferred approaches June 2021 published under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

I am writing on behalf of Epping Forest District Council (EFDC) to make representations following the publication under Regulation 18 of the Town and Country Planning (Local Planning) (England) of the Enfield Local Plan – Main Issues and Preferred Approaches – June 2021 ('the Local Plan'). These representations have been made in the spirit of cooperation. They are intended to be helpful within the context of this Council's very recent experience of how the Epping Forest Special Area of Conservation (EFSAC) matters are being considered as part of the ongoing examination of its emerging Local Plan. Whilst EFDC recognises the ongoing work regarding strategic planning under the Duty to Cooperate in respect of the EFSAC, the Council nevertheless considers that it is also appropriate to make representations following the publication of the Local Plan under Regulation 18.

In respect of matters that relate solely to the EFSAC, EFDC notes the results of the screening opinion in the HRA assessment draft report, June 2021 (HRA):

4.54 For air pollution, it is unknown at this stage whether the Local Plan will have a likely significant effect on its own due to a lack of traffic forecast data, but it is considered very likely that it will have a significant effect in combination with the traffic increases associated with growth in neighbouring plans.

The Council notes that the HRA states, in relation to Air Pollution, that further work is required to assess whether the screening thresholds are exceeded either from the Local Plan alone or in combination with other plans and projects. It states that if AADT thresholds are exceeded, air quality modelling will be required to understand whether the plan will result in adverse effect on integrity and whether avoidance measures can be applied which prevent adverse impacts on integrity. EFDC notes that Enfield Council has commissioned these assessments which will be completed following this Regulation 18 consultation.

We also note that the HRA states:

However, it is unclear at this stage how or if traffic from Enfield will be mitigated by the strategy proposed by Epping Forest District Council, and it is likely that Enfield would

need its own mitigation strategy in place. The proposed approach is something that requires further discussion between the neighbouring authorities and Natural England and is part of ongoing discussions under their Duty to Cooperate.

Until the traffic modelling and air quality assessment has been completed, and mitigation agreed, it is not possible for EFDC to conclude no adverse effects on the integrity of the Epping Forest SAC as a result of air pollution.

The HRA report at paragraph 5.23 notes that Epping Forest District Council has published an interim air pollution mitigation strategy which sets out a suite of mitigation measures that will be implemented and identifies *'the main feature of the strategy is the establishment of a Clean Air Zone, which will need to be in place by 2025'*. To be clear, whether such a zone continues to be needed and how this zone could work taking account of local issues and the flexibilities associated with establishing such a zone, is subject to continued environmental measurement and the detailed work-up of all schemes on the list including the options that surround a clean air zone. The introduction of a Clean Air Zone, to disincentivise only the drivers of the most polluting vehicles, will only be required if demonstrated by evidence that all of the other measures aren't successful. These measures are set out in the Interim Air Pollution Mitigation Strategy

4.55 For recreation pressure, the combined effect of growth in a number of neighbouring plans is already having a significant effect on Epping Forest SAC, and it is uncertain in relation to Lee Valley SPA/Ramsar and Wormley Hoddesdonpark Woods SAC.

The Epping Forest SAC lies 0.3km to the east of Enfield at its nearest point and as a result approximately half of the borough (the east) lies within 6.2km of the SAC. This includes all potential residential development sites east of the Hertford Loop railway line (which includes Winchmore Hill and Crews Hill stations), plus sites around Chase Park.

A significant number of new homes is proposed in Enfield, within 6.2km of Epping Forest (the majority of the 24,920 homes provided for on potential site allocations by Policy SSI, plus residential accommodation provided for in Policies H10, CL3, and H4), therefore the Local Plan will significantly contribute to an increase in recreation pressure at Epping Forest SAC. Policies which improve access to existing greenspace (BG1, and RE2), could also in theory increase recreation pressure on the Epping Forest SAC.

However, as set out in the HRA report, without more specific mitigation (for example required quantity of SANG/developer contributions) incorporated into Policy BG2 and the wording of any site allocation policies or development briefs that may be drafted at Regulation 19 stage, it is not possible to conclude no adverse effects on the integrity of Epping Forest SAC, as a result of recreation pressure.

Mitigation for recreation pressure at Epping Forest SAC needs to be set out in the Local Plan in order to avoid adverse effects on the integrity of Epping Forest SAC.

EFDC notes that the medium growth scenario for housing represents a continuation of the London Plan targets from 2029 to 2039, which is below the government's own housing requirement calculations. We also note the provision in the draft plan to allocate 3.2ha of employment land at land north west of Innova Park and a further 12 ha employment allocation at land west of Rommey Marsh. EFDC notes that qualitative transport assessments have been completed but that further transport modelling is required. For the avoidance of doubt, in assessing transport impacts, EFDC would

restate its objection to the Northern Gateway Access Road and the Northern Gateway Access Package.

Consequently it is not possible for the Council to make an informed assessment of the overall scale, quantum and location of development proposed and the efficacy of the relevant policies within the context of EFSAC matters. Consequently, at this point in time the Council is unable to determine whether the spatial strategy and the policies:

- Have been positively prepared
- Are justified
- Would be effective; and
- Are consistent with national policy

As the further information in relation to atmospheric pollution and impact of recreational pressure is yet to be published, and is a key part of the evidence base, EFDC reserves the right to make further detailed representations on both the spatial strategy and relevant policies in the Local Plan once this further evidence has been published.

This Council is committed to continuing to positively and actively engage with Enfield Borough Council on these issues under the Duty to Cooperate. To this end EFDC confirms that its officers and advisors would be happy to engage with the Council further not only on matters relating to recreational pressures for EFSAC, but also on those relating to the atmospheric pollution pathway of impact, housing and employment allocations.

This is in recognition of the Council's very recent experience of developing approaches with Natural England to mitigate the effects of planned development (both alone and in combination with other plans and projects) in order for it to be able to conclude that planned development within Epping Forest District would not result in an adverse effect on the integrity of the EFSAC.

Yours sincerely