



**STATEMENT OF COMMON GROUND**

between

**LONDON BOROUGH OF ENFIELD**

and

Barnet

Broxbourne

Epping Forest

Haringey

Hertsmere

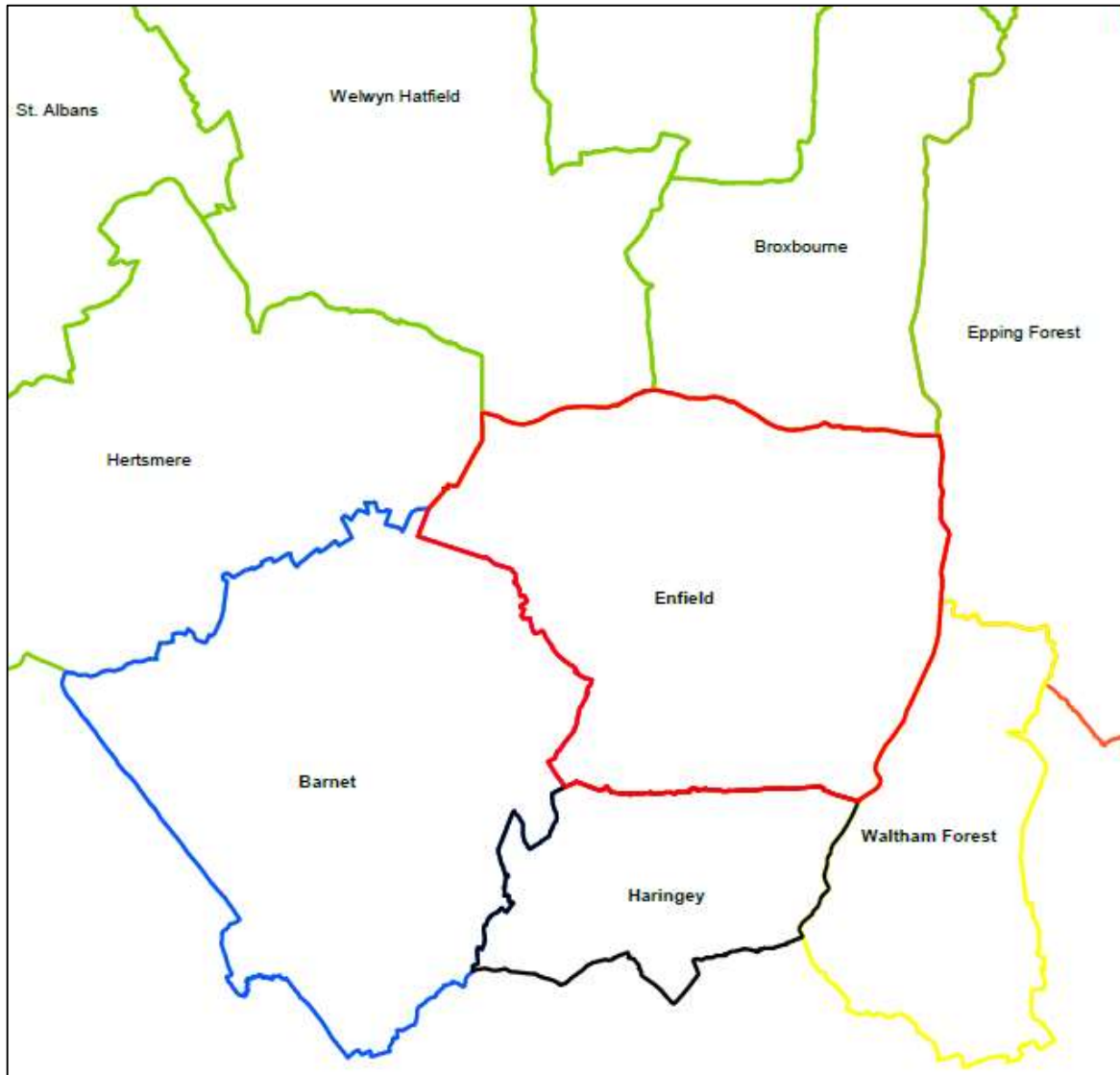
Waltham Forest

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 particularly 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 2021<sup>1</sup> 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 2018<sup>2</sup> 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

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<sup>1</sup> [Green Belt and MOL Assessment 2021-page 92](#)

<sup>2</sup> [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	[REDACTED]	Director of Planning & Growth - Environment & Communities Enfield Council	30 <sup>th</sup> July 2024	[REDACTED]
LB Barnet		Assistant Director of Planning – Barnet Council	25 July 2024	[REDACTED]
Broxbourne Borough		Planning Policy Manager – Borough of Broxbourne Council	30 July 2024	[REDACTED]
Epping Forest District		Planning Service Director	25 July 2024	[REDACTED]
LB Haringey		Head of Planning, Transport & Infrastructure	15 July 2024	[REDACTED]
Hertsmere Borough		Planning Strategy Manager	29 July 2024	[REDACTED]
LB Waltham Forest		Corporate Director Regeneration, Planning & Delivery	27 June 2024	[REDACTED]

Welwyn Hatfield Borough	Chris Carter	Assistant Director – (Planning)	15.08.24 (received on 07.01.25)	
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