

STRATEGIC ENVIRONMENTAL ASSESSMENT & HABITATS REGULATIONS ASSESSMENT: SCREENING REPORT

Draft Hadley Wood Neighbourhood Plan 2022 – 2039

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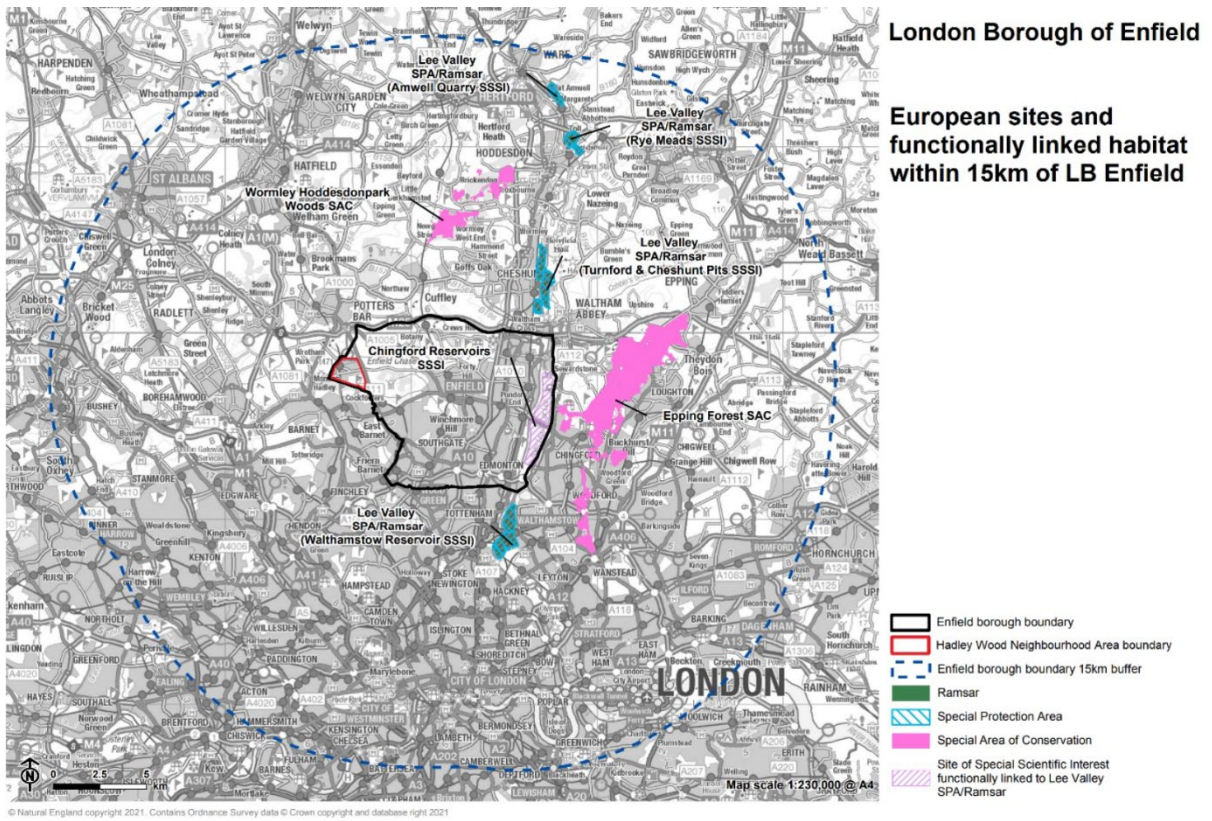
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1. Introduction

- 1.1. The purpose of this report is to determine whether the emerging Hadley Wood Neighbourhood Plan (HWNP) requires a Strategic Environmental Assessment (SEA) and/or a Habitats Regulations Assessment (HRA) through a process referred to as SEA and HRA screening.
- 1.2. The Hadley Wood Neighbourhood Plan area boundary is included in Figure 1 in red line.
- 1.3. Draft neighbourhood plan proposals are required to be assessed to determine whether the plan is likely to have significant environmental effects. Furthermore, a neighbourhood plan will be capable of being a material consideration in the assessment of future planning applications. As such it is the Council's responsibility, or a delegated body, to identify whether a Strategic Environmental Assessment (SEA) should be undertaken. This initial assessment process is commonly referred to as a 'screening' assessment and the requirements are set out in regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004¹. The SEA screening process is based upon consideration of standard criteria in Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004 to determine whether the Plan is likely to have "significant environmental effects".
- 1.4. The Local Authority is the "competent authority" under the Conservation of Habitats and Species Regulations 2017 and needs to ensure that Neighbourhood Plans have been assessed through the Habitats Regulations process. A Habitats Regulations Assessment (HRA) identifies whether a plan is likely to have a significant effect on a European site, either alone or in combination with other plans or projects. A HRA is required when it is deemed that likely significant effects may occur on protected European Sites (Natura 2000 sites) as a result of the implementation of a plan/project. The HRA screening will determine whether significant effects on a European site are likely.
- 1.5. London Borough Enfield (LBE) has prepared this screening report on behalf of Hadley Wood Neighbourhood Forum, the qualifying body for the Hadley Wood Neighbourhood Plan, as part of the neighbourhood planning duty to support. LBE has a responsibility to advise the Forum if there is a need for formal SEA or HRA of the draft plan.
- 1.6. Two of the Basic Conditions for a neighbourhood plan, which are tested at examination by an independent examiner, are whether the plan is compatible with relevant legal obligations including Strategic Environmental Assessment and whether the making of the neighbourhood plan will breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations (2017).
- 1.7. This report explains the legislative background to SEA and HRA screening, provides details of the draft HWNP before undertaking a SEA and HRA screening exercise and providing conclusions.
- 1.8. For the purposes of the above assessment the draft HWNP (version April 2022) has been screened. This version has developed clear vision and policies therefore is considered to be at an appropriate stage for the screening exercise to be undertaken. Once the Screening is complete, the Council is required to consult Environment Agency, Historic England and Natural England on its findings.

¹ <https://www.legislation.gov.uk/uksi/2004/1633/regulation/9/made>

Figure 1: Hadley Wood Neighbourhood Area red line boundary in relation to SACs, SPAs and Ramsar sites within 15km of LB Enfield



2. Legislative Background

Strategic Environmental Assessment (SEA)

- 2.1 The basis for Strategic Environmental Assessment legislation is European Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the Environment'. This document is also known as the Strategic Environmental Assessment (or SEA) Directive. European Directive 2001/42/EC was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulation) (as amended, including through EU Exit legislation).
- 2.2 The SEA Regulations include a definition of 'plans and programmes' to which the regulations apply, and which programmes are required by legislative, regulatory or administrative provisions.
- 2.3 A Neighbourhood Plan is not required by legislative, regulatory or administrative provisions. It is an optional process under the provision of the Town and Country Planning Act 1990 (subsequently amended by the Localism Act 2011). However, once a Neighbourhood Plan is 'made' it becomes part of the statutory development plan for the area to which it applies. As such, it therefore forms part of a plan that is required by legislative provisions. Once made, the HWNP will be part of the land use framework for the area and will help to determine the use of small areas at a local level. The Plan also seeks to designate several areas as Local Green Spaces.
- 2.4 The 'responsible authority' (London Borough of Enfield) must determine whether a plan or programme, in this case the draft HWNP, is likely to have significant environmental effects with reference to the criteria specified in Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004. If a strategic environmental assessment is required, it will often be possible to make use of information and analysis that has been used in assessing the environmental impact of local plans or spatial development strategies covering the area. In doing so, it will be important to consider the relevance of this material to the neighbourhood area, as well as whether it remains up to date.
- 2.5 The 'likely significance of effects' referred to in Article 3(5) of Directive 2001/42/EC will be assessed against in Section 4 of this report.

Habitat Regulation Assessment (HRA)

- 2.6 The European Directive 92/43/EEC on Conservation of Natural Habitats and Wild Flora and Fauna Habitats provides legal protection for habitats and species of European importance (the Habitats Directive). The Directive's principal aim is to maintain, and where necessary restore to, favourable conservation status of important, rare or vulnerable flora, fauna and habitats.
- 2.7 The requirement to undertake Habitats Regulations Assessment (HRA) of development plans was confirmed by the amendments to the Habitats Regulations

published for England and Wales in 2007²; the currently applicable version is the Habitats Regulations 2017³, as amended.

2.8 Article 6(3) of the EU Habitats Directive provides that:

“Any plan or project not directly connected with or necessary to the management of the [European] site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site’s conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.”

2.9 Regulations 105-106 of the Conservation of Habitats and Species Regulations 2017 state:

“105.—(1) Where a land use plan—

(a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and

(b) is not directly connected with or necessary to the management of the site, the plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site’s conservation objectives.

(2) The plan-making authority must for the purposes of the assessment consult the appropriate nature conservation body and have regard to any representations made by that body within such reasonable time as the authority specifies.

(3) The plan-making authority must also, if it considers it appropriate, take the opinion of the general public, and if it does so, it must take such steps for that purpose as it considers appropriate.

(4) In the light of the conclusions of the assessment, and subject to regulation 107, the plan-making authority must give effect to the land use plan only after having ascertained that it will not adversely affect the integrity of the European site or the European offshore marine site (as the case may be).

(5) A plan-making authority must provide such information as the appropriate authority may reasonably require for the purposes of the discharge by the appropriate authority of its obligations under this Chapter.

(6) This regulation does not apply in relation to a site which is—

² The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007 (2007) SI No. 2007/1843. TSO (The Stationery Office), London.

³ The Conservation of Habitats and Species Regulations 2017 (2017) SI No. 2017/1012, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579), TSO (The Stationery Office), London.

*(a) a European site by reason of regulation 8(1)(c), or
(b) a European offshore marine site by reason of regulation 18(c) of the Offshore Marine Conservation Regulations (site protected in accordance with Article 5(4) of the Habitats Directive).*

106.—(1) A qualifying body which submits a proposal for a neighbourhood development plan must provide such information as the competent authority may reasonably require for the purposes of the assessment under regulation 105 or to enable it to determine whether that assessment is required.

(2) In this regulation, “qualifying body” means a parish council, or an organisation or body designated as a neighbourhood forum, authorised for the purposes of a neighbourhood development plan to act in relation to a neighbourhood area as a result of section 61F of the TCPA 1990 (authorisation to act in relation to neighbourhood areas), as applied by section 38C of the 2004 Planning Act (supplementary provisions).

(3) Where the competent authority decides to revoke or modify a neighbourhood development plan after it has been made, it must for that purpose make an appropriate assessment of the implications for any European site likely to be significantly affected in view of that site's conservation objectives; and regulation 105 and paragraph (1) apply with the appropriate modifications in relation to such a revocation or modification.

(4) This regulation applies in relation to England only.”

2.10 The HRA refers to the assessment of the potential effects of a development plan on one or more sites afforded the highest level of protection in the UK: SPAs and SACs. These were classified under European Union (EU) legislation but, since 1 January 2021, are protected in the UK by the Habitats Regulations 2017 (as amended). Although the EU Directives from which the UK's Habitats Regulations originally derived are no longer binding, the Regulations still make reference to the lists of habitats and species that the sites were designated for, which are listed in annexes to the EU Directives:

- SACs are designated for particular habitat types (specified in Annex 1 of the EU Habitats Directive⁶) and species (Annex II).
- SPAs are classified for rare and vulnerable birds (Annex I of the EU Birds Directive⁷), and for regularly occurring migratory species not listed in Annex I.

2.11 The term 'European sites' was previously commonly used in HRA to refer to 'Natura 2000' sites⁴ and Ramsar sites (international designated under the Ramsar Convention). However, a Government Policy Paper⁵ on changes to the Habitats Regulations 2017 post-Brexit states that:

- Any references to Natura 2000 in the 2017 Regulations and in guidance now refers to the new 'national site network'.
- The national site network includes existing SACs and SPAs; and new SACs and SPAs designated under these Regulations.

⁴ The network of protected areas identified by the EU:

https://ec.europa.eu/environment/nature/natura2000/index_en.htm

⁵ <https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017>

- Designated Wetlands of International Importance (known as Ramsar sites) do not form part of the national site network. Many Ramsar sites overlap with SACs and SPAs and may be designated for the same or different species and habitats.

2.12 Although Ramsar sites do not form part of the new national site network, the Government Policy Paper, referred to above, confirms that all Ramsar sites remain protected in the same way as SACs and SPAs.

2.13 The requirement for HRA does not apply to other nationally designated wildlife sites such as Sites of Special Scientific Interest or National Nature Reserves.

3. Draft Hadley Wood Neighbourhood Plan 2022- 2039 Overview: Vision, Objectives & Policy Priorities

3.1 The Hadley Wood Neighbourhood Forum has developed Hadley Wood Neighbourhood Plan 2022-2039 (HWNP) Regulation 14 Consultation Draft in April 2022.

3.2 The draft HWNP includes the following vision:

‘Future development in Hadley Wood will follow the principles of ‘good growth’ by reinforcing and protecting the intrinsic qualities of both the built and the natural environment.

New homes will be of a high quality design and provide a wider choice for all.

The Green Belt, other green spaces, trees and vegetated gardens, so important to biodiversity, wellbeing, drainage and air quality, will be given stronger protection.

New footpaths, cycle routes and improved public transport will lead to healthier and more active lifestyles, reducing reliance on the car.

The Plan supports sustainable development, preserves our local character, and protects the natural environment.’

3.3 The draft HWNP states that the main objectives of the Plan are as follows:

‘Objective 01: Green Infrastructure and Natural Environment

Development will protect and enhance the existing green/open space and the local environment, and provide new tree planting.

Objective 02: Flood Risk

Future development will demonstrably manage rain water runoff and flood risk.

Objective 03: Housing

Development in Hadley Wood will provide a wider range of housing sizes including smaller family homes and downsizing options for older people.

Objective 04: Design and Character

Development will be of high-quality design and will be informed by existing character and grain, including height, scale and massing.

Objective 05: Public and Community Facilities

Development will support and contribute to public and community facilities in the area – bringing improvements for the local population.

Objective 06: Transport

Development will support and contribute towards enhancing the provision of public transport, pedestrian and leisure footpaths, and cycle routes.

Objective 07: The Crescent West Shopping Parade

Any future development of the Parade will promote and support our local retail businesses’

3.4 The draft Plan includes the following policies:

*“Policy HW-C1: Character, setting and views
Policy HW-C2: Trees, the natural environment and biodiversity
Policy HW-C3: Boundary walls, railings and gates
Policy HW-C4: Paving of front gardens and off-street parking
Policy HW-C5: Small sites, including back gardens
Policy HW-C6: Flood risk
Policy HW-C7: Sustainable urban drainage
Policy HW-C8: Local Green Space Designations
Policy HW-HD1: New housing development and mix
Policy HW-HD2: High-Quality Built Environment
Policy HW-HD3: Heritage Assets
Policy HW-HD4: Construction activity
Policy HW-SF1: Social and community facilities
Policy HW-SF2: The Crescent West Local Parade
Policy HW-AM1: Active travel
Policy HW-NC1: Developer Contributions”*

- 3.5 The Plan also contains a number of aspirations, recommendations and projects relating to these issues. As these are not land use policies they are not required to be screened for SEA.
- 3.6 The draft Plan does not allocate any sites for development.

4 Strategic Environmental Assessment (SEA) Screening

(1) Assessing 'likely significance'

4.1 The criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC, along with consideration of the likely impact of the neighbourhood plan against each, are set out below in Table 1.

Table 1 - Assessment of the likely significance of effects on the environment

SEA Directive criteria	Comments	Likely Significant Effects?
1 - The characteristics of plans and programmes, having regard to:		
(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources	<p>The Neighbourhood Plan must have regard to National Policy and be in general conformity with the strategic policies of the borough.</p> <p>The draft Hadley Wood Neighbourhood Plan, if adopted, would form part of the statutory Development Plan for the borough and as such contributes to the framework for future projects and activities in the Neighbourhood Area.</p> <p>The Plan does not allocate sites for development or address issues outside of those already assessed in the Council's Core Strategy and Development Management SA (incorporating SEA) and as such is not considered to have significant effects in this regard.</p>	No
(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy	<p>The Neighbourhood Plan must be consistent with the National Planning Policy Framework and in general conformity with the Council's strategic policies.</p> <p>The Neighbourhood Plan may form the context for and influence other documents for this area.</p> <p>However, it is considered the extent of impact is unlikely to be significant in this regard.</p>	No
(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development	<p>If passed at referendum, the plan will sit alongside the Council's current development plan documents which have undergone SA (incorporating SEA).</p> <p>The draft Plan considers all three dimensions to sustainable development: economic, social and environmental. The policies seek to protect residential amenity and conserve natural and heritage assets identified as important by the local community. The extent of these effects are not considered sufficient to warrant SEA.</p>	No
(d) environmental problems relevant to the plan or programme	<p>The draft Neighbourhood Plan seeks to address some environmental problems within the Hadley Wood Neighbourhood Area, such as increasing/protecting open/green space and limiting impermeable surfaces.</p>	No

	These issues are addressed in the SA of the Core Strategy and the Development Management and as such do not need further assessment.	
(e) the relevance of the plan or programme for the implementation of retained EU law on the environment (for example, plans and programmes linked to waste management or water protection)	The draft Plan is not directly relevant to the implementation of retained EU law on the environment including plans and programmes linked to waste management or water protection.	No
2 - Characteristics of the effects and of the area likely to be affected, having regard to:		
(a) the probability, duration, frequency and reversibility of the effects	The policies are not considered to extend significantly beyond those already tested for SEA in the Council's Development Plan for the borough	No
(b) the cumulative nature of the effects	Cumulative effects are where several policies or site allocations have insignificant effects but when put together have a significant combined effect. The draft Plan does not allocate sites for development nor do the policies extend significantly beyond those already tested for SEA in the Council's Development Plan for the borough.	No
(c) the transboundary nature of the effects	There are no trans-boundary effects arising from the draft Plan.	No
(d) the risks to human health or the environment (for example, due to accidents)	There are unlikely to be risks to human health or the environment arising from the Plan in respect of this criterion.	No
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The Plan would apply to development in the Hadley Wood Neighbourhood Area. Hadley Wood Neighbourhood Area has a population of approximately 2,475, however the neighbourhood plan does not allocate sites for development nor do the policies extend significantly beyond those already tested for SEA in the Council's Development Plan for the borough.	No
(f) the value and vulnerability of the area likely to be affected due to: (i) special natural characteristics or cultural heritage; (ii) exceeded environmental quality	The Plan has identified and set out justification for the designation of a number of 'Local Green Spaces' and wildlife corridors. Important local trees are also identified and replacement tree planting promoted, where the removal of a tree becomes necessary. The Plan area includes the Hadley Wood Conservation Area. A Conservation Area Appraisal (CCA) has been completed and a Management Plan put in place which seeks to manage the nature and impact of future change in the Conservation Area. It	No

standards or limit values; or (iii) intensive land-use	should be noted the conservation area appraisal is led by LBE, being a separate process to neighbourhood plan development. A formal Local List has been adopted by Enfield Council and the draft Plan identifies a number of non-designated Heritage assets, including those falling outside the Conservation Area, which positively contribute to the character and heritage of the area. The extent of these effects are not considered sufficient to warrant SEA.	
(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.	There are no landscapes of national or international protection statues such as National Parks and Areas of Outstanding Natural Beauty (AONBs) in the Plan area. The draft Plan includes Green Belt land which has a recognised national protection by the NPPF. The draft Plan proposes to further protect those areas by way of a Local Green Space designation. Furthermore, the draft Plan does not allocate sites for development nor do the policies extend significantly beyond those already tested for SEA in the Council's Development Plan for the borough.	No

(2) Consideration of HWNP draft policies

Character and Natural Environment

- 4.2 The policies in the Character and Natural Environment section seek to protect existing character, setting and views in Hadley Wood (HW-C1), to protect trees and enhance biodiversity within the neighbourhood area (HW-C2), to encourage boundary walls, railings and gates to be of low level and allow for views of landscaped gardens behind (HW-C3), to manage front gardens paving as well as supporting measures to introduce surface permeability (HW-C4), to manage small sites in particular back garden development where they would cause harm to the local area (HW-C5), to minimise flood risk and utilise SuDS (HW-C6 and HW-C7), and to identify a number of spaces to be designated as Local Green Spaces and therefore protected from development (HW-C8). These policy proposals will tend to result in positive environmental effects and minimise negative effects of development.

Housing

- 4.3 The draft policies in the Housing section seek to support development that helps rebalance housing mix and provide new, smaller dwellings across all tenure-types, and prevent loss of one, two or three-bedroom homes (HW-HD1), and to require all development including new built and extensions to positive respond to the character of Hadley Wood (HW-HD2). It is not considered that these policies are likely to have any significant effects on the environment.

Heritage

- 4.4 The policies in the Heritage section of the plan give guidance on the design of new developments so as to conserve and enhance the Hadley Wood Conservation Area and non-designated heritage assets at Camlet Way and the former Beech Hill Park

Entrance Lodge (HW-HD3). It requires constructors to minimise impact on residential amenity during construction phase through a Construction Management Plan in relation resulting congestion, light pollution, noise and vibration, dust, emissions and neighbourhood amenity (HW-HD4). These policies are designed to protect the architectural and heritage characteristics and quality of the Hadley Wood area and manage construction activities, thereby helping to minimise negative environmental impacts of development and maximise positive effects.

Services and Facilities

- 4.5 The policies in this section aim to prevent loss of existing public and community facilities and support additional community facilities in education, healthcare, childcare, sports clubs and community halls (HW-SF1). It seeks to enhance the viability and vitality of the Crescent West Local Parade (HW-SF2). These policies would have positive environmental impacts in that they support the improvement of the local environment by local access to the community facilities and retail offers. They also support the continuity of Local Parade through encouraging diversification which will help to ensure that the centre continues to serve the neighbourhood plan area in the long-term, reducing the need for residents to travel elsewhere to access shops and services.

Active Travel

- 4.6 The policy in this section (HW-AM1) seeks to protect, and expand, existing active travel infrastructure including footpath or cycle routes, and to support and enable active travel in new development. It also incorporates principles that contribute to safer environment i.e. public realms being well fronted and under natural surveillance. This policy will support environmental improvements in Hadley Wood by supporting measures that cause less environmental harm and improve non-motorised accessibility, hence have a positive impact to the environment.

(3) SEA Screening Outcome

- 4.7 In conclusion, following the assessment carried out in Table 1 above and the more detailed consideration of the draft policies, it is considered that it is unlikely that any significant environmental effects will arise as a result of the draft HWNP. Consequently, it can be concluded that, subject to HRA screening outcome, a SEA is not required when judged against the application of the SEA Directive criteria.
- 4.8 The draft HWNP does not allocate land for built development and applies to a localised area. No sensitive natural or heritage assets will be significantly affected by proposals within the plan. The plan has been prepared within the context of the strategic policies of the London Plan (2021), the Enfield Core Strategy (2010) and the Development Management (2014) which have been subject to Strategic Environmental Assessment. It is unlikely that there will be any significant additional environmental effects that have not already been considered and dealt with through a SEA/SA of the higher-level policies. It is considered by Enfield Council that it is not necessary for a Strategic Environmental Assessment to be undertaken of the draft Hadley Wood Neighbourhood Plan.

5 Habitats Regulations Assessment (HRA) Screening

- 5.1 As explained in Section 2 of this report, the HRA involves an assessment of any plan or project to establish if it has potential implications for European wildlife sites. The HRA will consider if the proposals in the neighbourhood plan have the potential to harm the habitats or species for which European wildlife sites are designated. These include Special Protection Areas (SPA) and Special Areas of Conservation (SAC). Ramsar Sites, whilst not covered by the Habitats Regulations, should be treated in the same way as European wildlife sites.
- 5.2 The initial screening stage of the HRA process determines if there are any likely significant effects as a result of the implementation of the plan and if an appropriate assessment is needed. This stage should provide a description of the plan and an identification of the SPA, SAC and Ramsar Sites which may be affected by the plan, and assess the significance of any possible effects on the identified Sites.

(1) Relevant SPA, SAC and Ramsar Sites

- 5.3 There are no SACs, SPAs or Ramsar sites within the HWNP area or within LBE. The following sites are within 15km of the Neighbourhood Plan area.
- **Epping Forest SAC** (10.2km from the neighbourhood area) and
 - **Wormley Hoddesdonpark Woods SAC** (7.2km from the neighbourhood area); and
 - **Lee Valley SPA and Ramsar** (9.5km from the neighbourhood area).
- 5.4 Figure 1 shows the HWNP Area in relation to the above Sites. Appendix 2 also includes a table of Site Information, providing more details on the sites and their locations, qualifying features, threats and pressures. Please note the Sites information in Appendix 2 is largely based on the most recent HRA for Enfield's emerging Local Plan (2021) Appendix A, carried out by LUC in 2021.

(2) Consideration of the likely effects of the neighbourhood plan

- 5.5 HRA Screening of the draft HWNP has been undertaken in line with current available guidance and seeks to meet the requirements of the Habitats Regulations. The Habitats Regulations require screening to involve the stages outlined in Table 2 below.

Table 2: Stages of HRA Screening

Regulation	Stage required by Regulation
Reg. 105(1)	1) Determine whether the plan or project is within the scope of the Habitats Regulations
	2) Determine whether the plan or project is of a type that could possibly have any (positive or negative) effect on a European site
	3) Determine whether the plan or project is directly connected with or necessary to the management of the European sites potentially affected
	4) Identify the European sites potentially adversely affected and their conservation objectives
	5) Determine whether the plan or project is likely to have a significant adverse effect on any European site alone

	6) Determine whether the plan or project is likely to have a significant adverse effect on any European site in combination with other plans or projects
Reg. 105(4 & 5)	7) Requires the information necessary to decide whether the plan or project would be likely to have a significant adverse effect on a European site either alone or in combination with other plans or projects

Determine whether the plan or project is within the scope of the Habitats Regulations (Screening Stage 1)

5.6 As stated above, neighbourhood plans fall within the scope of the Habitats Regulations and Enfield Council is the competent authority with regards to screening the Hadley Wood Neighbourhood Plan.

Determine whether the plan or project is of a type that could possibly have any (positive or negative) effect on a European site (Screening Stage 2)

5.7 Development such as new homes, employment space and infrastructure that is associated with neighbourhood plans has the potential to impact upon European sites in a variety of ways. Whilst the HWNP does not propose direct development, once 'made' it would be part of the framework to assessing new development. The following potential impact pathways and associated parameters could arise as a result of new development within the neighbourhood area:

- Air pollution.
- Recreation and urban impacts (e.g. urbanisation, trampling, nutrient enrichment, disturbance).
- Changes in water quantity and quality.

5.8 In this case, physical loss of habitat and non-physical disturbance (noise, vibration and light pollution) are unlikely as there are no European sites or habitats that are linked to European sites within the Hadley Wood neighbourhood area.

5.9 For each of the draft Neighbourhood Plan's policies, consideration is given to the type of development the policy could result in, impacts that could arise from that type of development, and then whether there is an impact pathway to any sites sensitive to that impact.

Identifying European sites that may be affected and their conservation objectives (Screening stages 3 & 4)

5.10 In order to initiate the search of European sites that could potentially be affected by a development, it is established practice in HRA to consider sites within the local planning authority area covered by the plan, and other sites that may be affected beyond this area.

5.11 A distance of 15km from the boundary of the plan area is typically used in the first instance to identify European sites with the potential to be affected by the proposals within a development plan. Figure 1 (in page 4) shows a map of the European Sites and functionally linked habitats.

5.12 Together, the text of the draft HWNP and information on the European sites have been used to confirm that the plan is not directly connected to or necessary for the management of any of the sites (Screening stage 3 & 4).

Assessment of ‘likely significant effects’ alone (Screening stage 5)

- 5.13 As required under Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended), an assessment has been undertaken of the ‘likely significant effects’ of the draft HWNP. See table 3 below.
- 5.14 A risk-based approach involving the application of the precautionary principle has been adopted in the assessment, such that a conclusion of ‘no significant effect’ has only been reached where it is considered unlikely, based on current knowledge and the information available, that a Neighbourhood Plan policy or site allocation would have a significant effect on the integrity of a European site.

Table 3: Screening matrix – draft HWNP policies

Policy	Likely activities (operation) to result as a consequence of the proposal	Potential effects if proposal implemented	Is the policy likely to have significant effects and therefore need to be scoped into the Appropriate Assessment?
Policy HW-C1: Character, setting and views	None; this policy sets out design principles for the new development but will not itself result in new development.	None	No
Policy HW-C2: Trees, the natural environment and biodiversity	None. This policy primarily promotes the protection of biodiversity in the neighbourhood area.	None	No
Policy HW-C3: Boundary walls, railings and gates	None; this policy sets out design principles for boundary walls, railings and gates but will not itself result in new development.	None	No
Policy HW-C4: Paving of front gardens and off-street parking	None; this policy sets out requirements for developers to demonstrate they have incorporated SuDS provision, as well as permeable natural or porous materials, into future hardstanding and proposals and retain lawn and vegetation but will not itself result in new development.	None	No
Policy HW-C5: Small sites, including back gardens	None; this policy sets out requirements for developers to demonstrate that mitigation or protective measures against environmental issues have been incorporated in future development proposals but will not itself result in new development.	None	No

Policy HW-C6: Flood risk	None; this policy sets out requirements for developers to demonstrate that mitigation or protective measures against environmental issues have been incorporated in future development proposals but will not itself result in new development.	None	No
Policy HW-C7: Sustainable urban drainage	None; this policy sets out requirements for developers to demonstrate they have incorporated SuDS provision into future development proposals but will not itself result in new development.	None	No
Policy HW-C8: Local Green Space Designations	None; this policy designates Local Green Spaces and sets principles for safeguarding them and minimising effects on them but will not itself result in development.	None	No
Policy HW-HD1: New housing development and mix	None; this policy requires from any housing proposal a mix of housing types, sizes and tenures consistent with the most up-to-date evidence of need in the local housing market area but will not itself result in new development (beyond that defined by other policies)	None	No
Policy HW-HD2: High-Quality Built Environment	None; this policy sets out design principles for the public realm and new development but will not itself result in new development.	None	No
Policy HW-HD3: Heritage Assets	None; this policy sets out planning requirements and design principles to ensure that new developments will enhance heritage assets but will not itself result in new development.	None	No
Policy HW-HD4: Construction activity	None; this policy requires any development to minimise impact on residential amenity during the construction phase, particularly in relation to on-street parking of contractors vehicles and the resulting congestion, light pollution, noise and vibration, dust, emissions and neighbourhood amenity whilst protecting the local environment, but will not itself result in new development.	None	No
Policy HW-SF1: Social and community facilities	This policy supports the provision of additional community facilities in the neighbourhood area.	None.	No. Although the policy supports the provision of additional

			community facilities in the neighbourhood area it is unlikely that the policy implementation will have significant effects on the national site network as no development could occur through this policy alone. This is because it is implemented through higher level policies such as the Local Plan - that are more strategic or more detailed and therefore more appropriate to assess for their effects on a European Site and associated sensitive areas.
Policy HW-SF2: The Crescent West Local Parade	None; this policy defines principles for development within the Crescent West Local Parade but will not itself result in new development.	None	No
Policy HW-AM1: Active travel	None; this policy promotes improved and extended footpaths and cycle paths, promotes natural surveillance, and aims to safeguard the capacity or safety of existing active travel infrastructure, including footpath or cycle space but will not itself result in new development.	None	No
Policy HW-NC1: Developer Contributions	None; the policy sets out the mechanisms and requirements for developer contributions but will not itself result in development.	None	No

5.15 The Hadley Wood NP does not propose any development sites, nor does not promote a greater amount of development than what is included in higher level plans. Overall the neighbourhood plan does seek to shape development that will come forward in the neighbourhood area. The focus of the Plan is to improve local sustainability, and many of the proposals would benefit the natural environment, for instance by supporting appropriate development, protecting the built and green environment especially trees and green space, managing any negative impact of the construction process, seeking improvements of active travel network, etc. These

mitigation and enhancement measures are unlikely to have adverse impact on the three protected European sites and Ramsar Site.

Determine whether the plan or project is likely to have a significant adverse effect on any European site ‘in combination’ with other plans or projects (Screening stages 6)

5.16 Whilst the Hadley Wood NP does not propose new development or allocate sites for development, it seeks to shape development that will come forward in the neighbourhood area. There are other projects or plans, together with the Hadley Wood NP, could impact the integrity of the protected Sites, i.e. by ‘in combination’ effect. The most relevant of these are likely to be the other Enfield development plans, the London-wide plans including adjoining authorities plans, as the potential impacts of these plans will be similar and therefore mutually reinforcing.

5.17 A review of such projects or plans is carried out as below:-

The London Plan (2021)

5.18 The London Plan was adopted in 2021. In order to consider the ‘in combination’ effect, it is firstly necessary to refer to the HRA Screening & Appropriate Assessment of the London Plan, for it forms Enfield’s most up-to-date statutory plan. The London Plan (2021) has introduced change to the growth pattern across London boroughs, and as a result certain land use elements in the Enfield Core Strategy (2010) are out of date.

5.19 AECOM undertook the HRA (2017, 2018, 2019, 2020) for the London Plan (the later iterations also took into account of Natural England’s comments). The HRA for the London Plan looked at the scale and pattern of growth across London and the impacts on European sites. The process was based on the latest available data on the condition of the sites, potential threats and pressures and mitigation responses. It also carried out a comprehensive review of relevant plans, projects to test the ‘In Combination’ effects in relation to additional housing, commercial and industrial development proposed both within the GLA area and authorities neighbouring the GLA over the lifetime of the London Plan. These included plans and projects across all London boroughs, adjoining out-of-London authorities, and national infrastructure planning projects, totally of just over 100 plans and projects that were either adopted or under preparation.

5.20 Section 4 of the London Plan HRA (2019) concluded that most London Plan policies, except two, would not pose risk of likely significant effects. The two policies were Policy SD1 on Opportunity Areas and Policy H1 Increasing Housing Supply in relation to the broad locations of ten-year housing growth and the expected employment growth. The focus of the main body of the HRA was therefore on the implication of these two policies on the European Sites, on their own and in combined effect with other plans, and their subsequent appropriate assessment.

- **Epping Forest SAC** is of particular relevance to Enfield and HWNP due to its close proximity and Visitor Survey. The assessment on Epping Forest SAC was discussed in Section 7 of the HRA. Section 10 included policy recommendations. The appropriate assessment considered the significant effects under the issues of Recreational activity, Urbanisation, and Air Quality, which resulted in change. The GLA pointed out that the Plan did not allocate sites; it would be for the relevant borough through their plan making to ensure that any sites allocated take account of possible impacts in relation to mitigation solutions.

- **Lee Valley SPA and Ramsar** was discussed in Section 8. The appropriate assessment considered the significant effects in relation to Recreational activity, Air quality, and Water resources, but concluded no significant effect would arise from change in number of residents within Regional Park catchment.
- **Wormley Hoddesdonpark Woods SAC** Appropriate Assessment was undertaken in Section 11.6. It was concluded that no adverse effect would arise in combination from the London Plan.

5.21 The above matters were subsequently addressed by making amendments to policy and matters to boroughs (particularly those around Epping Forest SAC). It was considered that sufficient protective mechanisms were in place to ensure that the growth objectives of the London Plan to be delivered without an adverse effect on the integrity of European sites, either alone or in combination with other plans and projects (HRA 2019 and 2020 Addendum). Consequently, the London Plan Policy H1, part 8B incorporated requirement to produce '*a mitigation strategy for Epping Forest Special Area of Conservation (SAC) to respond to the impact of additional recreational pressure and air pollution from nearby authorities, including some London boroughs*' should monitoring and evidence demonstrate adverse impacts on the SAC associated. London Plan Policy G6, paragraph 8.6.3 stated '*Sites with a formal European or national designation (including Special Protection Areas, Special Areas of Conservation, Sites of special scientific Interest, National Nature Reserves and Local Reserves) are protected by legislation are legal provisions, which ensures these sites are not harmed by development. There is a duty to consult Natural England on proposals that might affect these sites and undertake an appropriate assessment of the potential impacts on European sites if a plan or project is likely to have a significant effect on the integrity of a European site*'. These apply to individual boroughs including Enfield.

5.22 Natural England was satisfied with its findings and recommended mitigation measures have been included in the London Plan. It was not expected that the mitigation strategy for Epping Forest which was being prepared would impede delivery in London, but further text was suggested to cover that eventuality. Subject to recommendations, the Inspector of the London Plan EIP was satisfied that the Plan meets the requirements of the Conservation of Habitats and Species Regulations 2017 and relevant national policy and guidance.

Enfield Core Strategy (2010)
Development Management Document (2014)
North Circular Area Action Plan (2014)
North East Enfield Area Action Plan (2016)
Edmonton Leaside Area Action Plan (2020)

5.23 In 2009, an HRA was undertaken to screen Enfield Council's current development plan, the Core Strategy (2010), and concluded that none of the policies were likely to have a significant adverse impact on European sites. Therefore, Appropriate Assessment (AA) was not considered necessary at that time. In 2013, a review was undertaken of the 2009 HRA screening. It looked into the 2009 Core Strategy Appropriate Assessment Screening and individual policies in the Core Strategy and their cumulative impact. It concluded the baseline of the 2009 AA still relevant and appropriate, and the proposed Development Management Document and North Circular AAP (at the time) would be unlikely to introduce significant changes to the Core Strategy policies that would have an environmental impact beyond what those

already considered. It however suggested that an AA may be required for the Central Leaside (now Edmonton Leaside) and North East Enfield Area Action Plans.

North East Enfield Area Action Plan (2016)

- 5.24 An Habitats Regulations Assessment, dated April 2014, was carried out. This concluded that all likely significant effects on European Sites have been avoided. Natural England confirmed that the Council's approach was justified.

Edmonton Leaside Area Action Plan (2020)

- 5.25 Following the Screening Statement updated in 2013, an HRA (2017) was carried out on the Edmonton Leaside AAP. Para 14.1 concluded that:-

Consideration of the policies in the Proposed Submission Edmonton Leaside AAP indicates that all likely significant effects, alone or in combination, on European Sites within the zone of influence of the AAP area, have been avoided. The AAP provides an appropriate framework for future development and regeneration in Edmonton Leaside whilst avoiding the potential for likely significant effects on European Sites. There is therefore no requirement for the Habitats Regulations Assessment process to further consider potential effects of the Edmonton Leaside AAP on European Sites.

- 5.26 After examining and assessing the effects as proposed by the AAP, the HRA concluded the effect would unlikely be significant, alone or in combination, on the three European Sites within the zone of influence.

The emerging Enfield Local Plan Reg 18 Draft (2021)

- 5.27 HRA work on the emerging Local Plan (ELP) began in May 2020 with an HRA Scoping Report (contained within the Integrated Impact Assessment Scoping Report) that was produced by AECOM and set out the proposed HRA methodology, identified European sites that could potentially be affected by the Enfield Local Plan and identified other plans and programmes that could have in-combination effects with the Enfield Local Plan.

- 5.28 AECOM's Scoping Report concluded that the main issues that would need to be the focus of HRA assessment, were recreation pressure / disturbance and air pollution at Epping Forest SAC, Lee Valley SPA/ Ramsar and Wormley Hoddesdonpark Woods SAC. AECOM considered that the effects at Epping Forest SAC would be more likely to be significant than at the other sites, and concluded that water resource and quality impacts could be scoped out of the HRA.

- 5.29 The consequent HRA (June 2021) Screening and Appropriate Assessment built on AECOM' findings and was carried out by LUC in 2021. It concluded that the following policies and all potential site allocations currently identified in the Enfield Local Plan Regulation 18 Draft could have a likely significant effect on European sites, alone or in combination with other plans or projects:

- SS1: Spatial strategy;
- H1: Housing development sites;
- H10: Gypsy and Traveller accommodation;
- E1: Employment and growth;
- E5: Transforming Strategic Industrial Locations and Locally Significant Industrial Sites;

- SC2: Protecting and enhancing social and community infrastructure;
- CL2: Leisure and tourism;
- CL3: Visitor accommodation;
- CL4: Promoting sporting excellence;
- BG1: Enfield's blue and green infrastructure network;
- T1: Promoting sustainable transport;
- H4: Small sites and small housing development; and
- RE2: Improving access to the countryside and green corridors.

5.30 Through the information reviewed and mitigation measures considered during the Appropriate Assessment, it was concluded that no adverse effect on integrity would occur for the following impacts and European sites due to confirmed safeguarding and mitigation measures as detailed in Chapter 5.

- Functionally linked habitat: physical damage and loss habitat – no adverse effects on the integrity of Lee Valley SPA/Ramsar;
- Functionally linked habitat: non-physical disturbance – no adverse effects on the integrity of Lee Valley SPA/Ramsar;
- Recreation pressure – no adverse effects on the integrity of Lee Valley SPA/Ramsar or Wormley Hoddesdonpark Woods SAC; and
- Water quality and quantity – no adverse effects on the integrity of Lee Valley SPA/Ramsar.

5.31 In relation to the other impacts (air pollution and recreation pressure), further information or stronger policy wording was recommended to ensure no adverse effects on integrity.

5.32 Natural England was consulted on LUC's draft HRA report. They broadly agreed with this HRA conclusion in their response to the ELP (dated on 13 September 2021) in relation to the summary of the Appropriate Assessment subject to factual corrections and further clarification and strengthening of the screen process. In relation to air quality, due to the scale of proposed growth, without effective cross-boundary cooperation with other Boroughs, it would be unlikely that a Likely Significant Effect on the SAC could be ruled out at this stage. Natural England agreed with the conclusions of the HRA that currently the effects of the plan on air quality remain uncertain and that further information would be required. In terms of recreational pressure avoidance and mitigation measures, Natural England agreed with the recommendations made in the HRA, especially the importance of strategic SANG measures and the need for more detailed wording in policy BG2. For these reasons Natural England agreed with the HRA conclusion that it would be impossible to conclude no adverse effects on the integrity of Epping Forest SAC as a result of recreational pressure at this stage.

5.33 **In summary**, the HRA on the emerging Enfield Local Plan Reg-18 (June 2021), confirmed by Natural England, was still inconclusive on the significant effects in relation to air quality and recreational pressure on Epping Forest SAC.

5.34 It is however worth noting that the emerging Enfield Local Plan is at early stage and does not carry material weight, and discussion and engagement with Natural England will be on going as part of Enfield Local Plan plan-making process. The HWNP itself does not propose any site allocation. The HRA Screening of the HWNP is sequential to the Appropriate Assessment of those higher-level plans, development within which are over and above those in the HWNP.

(3) HRA Screening Conclusion

- 5.35 There are no European sites within the HWNP area, therefore loss of habitat from within the boundaries of a European site can be ruled out.
- 5.36 Three SACs, SPAs and Ramsar sites are identified with pathways of 10-15km of the HWP area boundary that should be included within the HRA.
- 5.37 The Draft HWNP builds on the adopted approach in higher level plans and does not introduce new policy requirements. It does not propose any development sites or promote a greater amount of development than what is already included in higher level plans.
- 5.38 Following consideration of the distance between Hadley Wood Neighbourhood Area and the protected sites, the contents of the draft neighbourhood plan, and of the 'in combination effects', it can be concluded that the plan is unlikely to have any significant effects on the designated European sites, alone or in combination with other projects and programmes, consequently the draft plan is not considered to require further assessment under Article 6 or 7 of the Habitats Directive (Art. 3.2(b))

6 Screening conclusions

- 6.1 A SEA and HRA screening exercise has been undertaken for the draft Hadley Wood Neighbourhood Plan 2022-2039 (HWNP). The assessments have concluded that the HWNP is unlikely to give rise to any significant environmental effects or have significant effects on an European site. Accordingly, it is considered that an SEA, or further HRA assessment is not required for the HWNP.

7 Comments from Statutory Consultation Bodies

- 7.1 Regulation 4 of the Environmental Assessment of Plans and Programmes Regulations 2004 defines certain organisations with environmental responsibilities as consultation bodies. In England the environmental assessment consultation bodies are Historic England, Natural England, and the Environment Agency.
- 7.2 A draft Screening Report was sent to the environmental consultation bodies to seek a formal Screening Opinion on 18 May 2022. Consultation ended on 22 June 2022.
- 7.3 All of the consultation bodies replied to the consultation. No objections were raised on the assessment and screening conclusion. Full details of the responses can be found in Appendix 1 of this report. A summary of their responses is provided within the table below:

Consultation Body Summary of comments	Consultation Body Summary of comments
Historic England	On the basis of the information supplied, and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations [Annex II of 'SEA' Directive], Historic England concurs with the Council that the preparation of a Strategic Environmental Assessment is not required.
Environment Agency	We have had to prioritise our limited resource and focus on strategic plans where the environmental risks and opportunities are highest. We attach our advice note which sets out our substantive response to Neighbourhood Plan consultations including Strategic Environmental Assessment screening and scoping. We have no bespoke comments to make on the plan outside of the advice note provided.
Natural England	We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.

8 Determination

- 8.1 In the light of the above SEA HRA Screening Report for consultation and the responses to this from the statutory bodies it is determined that the Hadley Wood Neighbourhood Plan **does not require** a Strategic Environmental Assessment in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004.
- 8.2 It is important to note that this screening opinion is based on the HWNP Draft (April 2022 Version). Consequently, if the content of the resulting neighbourhood plan should materially change then the SEA/HRA screening process will need to be reassessed and updated.

Appendix 1: Consultation Responses from Environmental Assessment Statutory Consultation Bodies

From: LondonPlanningPolicy <LondonPlanningPolicy@HistoricEngland.org.uk>
Sent: 19 May 2022 16:33
To: LocalPlan <LocalPlan@Enfield.gov.uk>
Cc: [REDACTED]
Subject: Hadley Wood Neighbourhood Plan - SEA and HRA Screening Opinions [SEC=OFFICIAL]

Dear Planning, Enfield

RE: Hadley Wood Neighbourhood Plan SEA Screening

Thank you for inviting Historic England to comment on this consultation. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore, we welcome this opportunity to review the Screening Report for this plan. For the purposes of this consultation, Historic England will confine its advice to the question, "Is it (the Hadley Wood Neighbourhood Plan) likely to have a significant effect on the historic environment?". Our comments are based on the information supplied with the Screening Opinion.

The Screening Report indicates that the Council considers that the plan will not have any significant effects on the historic environment. We note that the plan does not propose to allocate any sites for development.

On the basis of the information supplied, and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations [Annex II of 'SEA' Directive], Historic England concurs with the Council that the preparation of a Strategic Environmental Assessment is not required.

The views of the other two statutory consultation bodies should be taken into account before the overall decision on the need for an SEA is made.

I should be pleased if you can send a copy of the determination as required by REG 11 of the Environmental Assessment of Plans and Programmes Regulations 2004.

We should like to stress that this opinion is based on the information provided by you with your correspondence. To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan) where we consider that, despite the SEA, these would have an adverse effect upon the environment.

Historic England strongly advises that the conservation staff of the relevant local authorities and the archaeological staff at [GLAAS](#) are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local

historic environment issues and priorities, including access to data held in the Greater London Historic Environment Record (GLHER), how the allocation, policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Please do contact me, either via email or the number below, if you have any queries.

Kind regards

Steve

Steve Hurst

Business Officer | Barnet | Hammersmith & Fulham | Harrow | Havering | Kingston Upon Thames | Richmond Upon Thames | Wandsworth
Planning Group | London



Historic England | 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London, EC4R 2YA

From: LocalPlan <LocalPlan@Enfield.gov.uk>

Sent: 18 May 2022 10:12

To: LocalPlan <LocalPlan@Enfield.gov.uk>

Subject: Hadley Wood Neighbourhood Plan - SEA and HRA Screening Opinions
[SEC=OFFICIAL]

THIS IS AN EXTERNAL EMAIL: do not click any links or open any attachments unless you trust the sender and were expecting the content to be sent to you

Classification: OFFICIAL

Dear Sir/Madam,

I am writing to you regarding the SEA/ HRA Screening Opinions of the Hadley Wood Neighbourhood Plan 2022 - 2039.

Hadley Wood Neighbourhood Forum has started Regulation 14 consultation on their neighbourhood plan from 8 May and 3 July 2022 (8 weeks). The Hadley Wood Neighbourhood Plan 2022 - 2039 is available via [this link](#).

Please find attached a copy the Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) Screening report of the above Plan, prepared by the London Borough of Enfield.

SEA and HRA regulations require this report be made available to the statutory bodies Historic England, Natural England and the Environment Agency for comment before neighbourhood plan being finalised. The Council's opinion is that it does not consider the Plan requires a full SEA or further HRA to be undertaken.

I would be grateful if you could come back to me to confirm if you have any comments on these screening opinions. Please could you respond by **Wednesday 22 June** (five weeks from the date of the e-mail is sent) at the latest. If you are able to respond sooner than this date, it would be much appreciated.

Kind Regards

Plan Making Team
Strategic Planning and Design | Planning Service

Place Department

Team number: 020 8379 3866



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Date: 13 June 2022
Our ref: 392531



Enfield London Borough Council

BY EMAIL ONLY

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sir/Madam

Hadley Wood Neighbourhood Plan – SEA/HRA Screening Opinion

Thank you for your consultation on the above dated 18 May 2022 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Screening Request: Strategic Environmental Assessment / Habitats Regulation Assessment

It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan. Hadley Wood Neighbourhood Plan does not allocate any sites for development and as such, we are in agreement with the council that no SEA or HRA is required. Should the Neighbourhood Plan decide to allocate sites for development, this opinion may need to be revised.

Neighbourhood Plan

Guidance on the assessment of Neighbourhood Plans, in light of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended), is contained within the [National Planning Practice Guidance](#). The guidance highlights three triggers that may require the production of an SEA, for instance where:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

We have checked our records and based on the information provided, we can confirm

that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.

We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.

Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

For any queries relating to the specific advice in this letter only please contact Isabella Jack at [REDACTED] For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Isabella Jack
Sustainable
Development Adviser
Thames Solent Team,
Natural England

From: Lloyd, George [REDACTED]
Sent: 23 June 2022 14:48
To: Joyce Zhu <Joyce.Zhu@enfield.gov.uk>
Cc: LocalPlan <LocalPlan@Enfield.gov.uk>
Subject: RE: Hadley Wood Neighbourhood Plan - SEA and HRA Screening Opinions [SEC=OFFICIAL]

Hi Joyce,

We have no bespoke comments to make on the plan outside of the advice note provided.

Kind regards

George LLOYD

From: Joyce Zhu <Joyce.Zhu@enfield.gov.uk>
Sent: 23 June 2022 12:44
To: Lloyd, George [REDACTED]
Cc: HNL Sustainable Places <HNLsustainablePlaces@environment-agency.gov.uk>; LocalPlan <LocalPlan@Enfield.gov.uk>
Subject: RE: Hadley Wood Neighbourhood Plan - SEA and HRA Screening Opinions [SEC=OFFICIAL]
Importance: High

You don't often get email from [REDACTED]. [Learn why this is important](#)

Dear George

Thank you for your reply on the above SEA screening consultation and the information leaflet.

Would you please clarify that whether you do not wish to comment on the SEA HRA Screening Opinions, or you do not disagree with the conclusions reached by screening report.

I would be most grateful if you could respond at your earliest convenience so that I can update the screening report and feed back to the Neighbourhood Forum.

Kind regards
Joyce

Joyce Zhu Msc MRTPI
Principal Planner | Plan Making Team
Strategic Planning and Design | Planning Service | Place Department

I work part time (Monday – Thursday)

Email: joyce.zhu@enfield.gov.uk
Web: www.enfield.gov.uk

From: HNL Sustainable Places <HNLsustainablePlaces@environment-agency.gov.uk>
Sent: 16 June 2022 15:37
To: LocalPlan <LocalPlan@Enfield.gov.uk>
Subject: RE: Hadley Wood Neighbourhood Plan - SEA and HRA Screening Opinions [SEC=OFFICIAL]

Dear Plan Making Team

Thank you for consulting us on the Neighbourhood Plan consultation for Hadley Wood.

We have had to prioritise our limited resource and focus on strategic plans where the environmental risks and opportunities are highest. We attach our advice note which sets out our substantive response to Neighbourhood Plan consultations including Strategic Environmental Assessment screening and scoping.

We recognise that Neighbourhood Plans provide a unique opportunity to deliver enhancements to the natural environment at the local level. This advice note sets out the key environmental issues, within our remit, which should be considered. It also references sources of data you can use to check environmental features.

We hope this is helpful as you prepare evidence and the Neighbourhood Plan itself.

If you have any feedback please let us know.

Kind regards

George Lloyd

Planning Advisor, Hertfordshire and North London Sustainable Places
Environment Agency | 2 Marsham Street, 3rd floor, London, SW1P 4DF



Pronouns : he/him ([why is this here?](#))



Appendix 2: Table: SACs, SPAs and Ramsar sites within 15km of LB Enfield – location, qualifying features, threats and pressures (Information based on ELP Reg 18 Consultation Draft HRA – Appendix A, prepared by LUC in June 2021)

Site	Qualifying Features (Reasons for Designation)	Threats and pressures
<p>Epping Forest SAC (1,630.74 ha)</p> <p>Location: Epping Forest SAC is formed of several fragmented sites located east of the borough and within the 15km boundary buffer. The closest site is 0.3km east of the LBE boundary.</p>	<p>The habitats and species which are the primary reason for the designation of this site are: Atlantic acidophilous beech <i>Fagus sylvatica</i> forests with holly <i>Ilex aquifolium</i> and sometimes also yew <i>Taxus baccata</i> in the shrub layer, and the stag beetle <i>Lucanus cervus</i>. Habitats present as a qualifying feature, but not a primary reason for the</p>	<p>Threats and pressures on this site include the following:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Air pollution: impact of atmospheric nitrogen deposition <input type="checkbox"/> Undergrazing <input type="checkbox"/> Public access / disturbance <input type="checkbox"/> Changes in species distributions <input type="checkbox"/> Inappropriate water levels <input type="checkbox"/> Water pollution <input type="checkbox"/> Invasive species <input type="checkbox"/> Disease <input type="checkbox"/> Invasive species <p>Air Pollution: impact of atmospheric nitrogen deposition - Nitrogen deposition exceeds site-relevant critical loads for ecosystem protection. Some parts of the site are assessed as in unfavourable condition for reasons linked to air pollution impacts.</p> <p>Undergrazing - The quality and diversity of the SAC features requires targeted management best achieved through grazing to: minimise scrub invasion; minimise robust grass domination, and maximise the species diversity of heathland plant communities.</p> <p>Public Access / Disturbance - Epping Forest is subject to high recreational pressure.</p> <p>Changes in species distributions - Beech tree health and recruitment may not be coping sufficiently with environmental conditions to sustain its presence and representation within the SAC feature. This may be linked to climate change as well as other factors such as air quality, recreational pressure and water availability.</p> <p>Inappropriate water levels - Wet heath is dependent on suitable ground water levels. There is a threat of prolonged drying out through climate change.</p> <p>Water pollution - Surface run-off of poor quality water from roads with elevated levels of pollutants, nutrients and salinity may be affecting wet heath, probably mostly around the edges.</p>

Site	Qualifying Features (Reasons for Designation)	Threats and pressures
	<p>designation of the site are: northern Atlantic we heaths with cross-leaved heath Eirca tetralix and European dry heaths</p>	<p>Invasive species - Heather beetle has locally impacted on some heathland areas. Grey squirrel is not currently known to be significantly affecting tree health or regeneration but this will need to be monitored. Disease - Tree diseases such as Phytophthora present a real threat to Beech.</p> <p>In addition to the above, the supplementary advice⁶⁷ identifies the following vulnerabilities: Adaptation and resilience of the feature – the vulnerability of Epping Forest SAC to climate change has been assessed by Natural England as being Medium taking into account the sensitivity, fragmentation, topography and management of its habitats. Functional connectivity with wider landscape- The heathland resource is extensive in county terms but is fragmented, mainly by closed tree canopy habitat and roads. It is therefore vulnerable to encroachment, boundary effects, pollution, recreational impact and hydrological changes. Vegetation structure - Variations in the structure of the heathland vegetation (vegetation height, amount of canopy closure, and patch structure) is needed to maintain high niche diversity and hence high species richness of characteristic heathland plants and animals. There is currently low cover (<25%) of dwarf shrubs present for the feature and less than 15% of scrub and tree cover. Soils - the soils of the wet heath habitat are vulnerable to, and have been exposed to acidification, nutrient enrichment and pollution due to their fragmentation and proximity to roads and urban/residential development. Illumination - Epping Forest is fragmented by roads and largely surrounded by urban development and residential areas. Opportunities should be sought to minimise and reduce light pollution from existing development and any development plans or projects to ensure SAC features and significant biodiversity assets are safeguarded.</p> <p>Site Improvement Plan: Epping Forest, Natural England, December 2016. Available at: http://publications.naturalengland.org.uk/publication/6663446854631424?category=35016.</p>
<p>Lee Valley SPA (Special Protection Area and Ramsar site)</p>	<p>Open water/Standing waters/canals and surrounding</p>	<p>Threats and pressures on this site include the following:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Water pollution <input type="checkbox"/> Hydrological changes <input type="checkbox"/> Public access / disturbance <input type="checkbox"/> Inappropriate scrub control

Site	Qualifying Features (Reasons for Designation)	Threats and pressures
<p>(447.87 ha)</p> <p>Location: Lee Valley SPA & Ramsar is formed of several fragmented sites. The closest sections of the sites lie 0.7km south east and 1 km north east of the LBE boundary.</p>	<p>marginal habitats. The site qualifies as an SPA by supporting overwintering populations of European importance for the following species: bittern, gadwall and shoveler. The site also qualifies as a Ramsar site due to the presence of vulnerable, endangered or critically endangered species (bittern) and as it regularly supports 1% of the individuals in a population of one species or subspecies</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Fisheries: Fish stocking <input type="checkbox"/> Invasive species <input type="checkbox"/> Inappropriate cutting / mowing <input type="checkbox"/> Air pollution: risk of atmospheric nitrogen deposition <p>Water Pollution - The vegetation and invertebrates provide food for the ducks, while fish provide food for the bitterns; and the habitat mosaic needs to vary from clear open water with abundant aquatic vegetation to moderately eutrophic conditions. Changes in water quality need to be managed to prevent loss of suitable habitat and food sources.</p> <p>Hydrological changes - Reservoir levels linked to operational requirements and all water bodies subject to natural fluctuations accounting for abstraction and climatic change.</p> <p>Public Access/Disturbance - Areas of the SPA are subject to a range of recreational pressures including watersports, angling and dog walking. This has the potential to affect SPA populations directly or indirectly.</p> <p>Inappropriate scrub control - The reedbed habitats, muddy fringes, and bankside all provide habitat as part of the mosaic for the SPA birds. Scrub control is necessary to ensure these habitats are maintained.</p> <p>Fisheries: Fish stocking - Fish population and species composition needs to be appropriate to ensure suitable habitats including food resource and water quality are maintained for SPA bird species.</p> <p>Invasive species - Azolla and/or invasive aquatic blanket weeds will adversely affect aquatic habitat (food sources).</p> <p>Inappropriate cutting/mowing - The reedbed requires rotational management for bittern.</p> <p>Air Pollution: risk of atmospheric nitrogen deposition - Nitrogen deposition exceeds site relevant critical loads.</p> <p>The Information Sheet on Ramsar Wetlands also notes the whole site supports high levels of visitor pressure; principally for purposes of angling, walking, cycling and birdwatching; with boating on the adjacent canal. These activities are mostly well regulated and at current levels are not considered to threaten the interest of the Ramsar site (although they may reduce the potential for enhancing the interest).</p>

Site	Qualifying Features (Reasons for Designation)	Threats and pressures
	<p>or waterbird (gadwall and shoveler).</p>	<p>In addition to the above, the supplementary advice⁶² identifies the following vulnerabilities:</p> <p>Conservation measures - Active and ongoing conservation management is often needed to protect, maintain or restore <i>Botaurus stellaris</i> Great bittern (non-breeding) at this site.</p> <p>Vegetation characteristics - Many bird species will have specific requirements that conservation measures will aim to maintain, for others such requirements will be less clear. Activities that may directly or indirectly affect the vegetation of supporting habitats and modify these characteristics may adversely affect the feature.</p> <p>Connectivity with supporting habitats - Bitterns clearly move between sites within the Lee Valley and to do this they will need to move safely to and from supporting habitat between individual waterbodies and above/across land outside the SPA. Also, the ability of Northern Shoveler to safely and successfully move to and from feeding and roosting areas is critical to their adult fitness and survival.</p> <p>Water depth - As the birds will rely on detecting their prey within the water to hunt, the depth of water at critical times of year may be paramount for successful feeding and therefore their fitness and survival.</p> <p>Population abundance – the population of Northern Shoveler within Lee Valley SPA has shown a slight decrease since Classification. The key SPA sites at Amwell and Turnford & Cheshunt Pits experienced a population decline during the 1999/00 – 2008/09 period, along with the functionally linked non- SPA Holyfield gravel pits. The SPA Walthamstow reservoirs and non-SPA Chingford reservoirs show population trends that appear to be related to water levels and available food resource.</p> <p>Food availability within supporting habitat - the availability of an abundant food supply is critically important for successful breeding, adult fitness and survival and the overall sustainability of the population. As a result, inappropriate management and direct or indirect impacts which may affect the distribution, abundance and availability of prey may adversely affect the population.</p> <p>Site Improvement Plan: Lee Valley, Natural England, December 2014. Available at: http://publications.naturalengland.org.uk/publication/5864999960444928?category=23039.</p>

Site	Qualifying Features (Reasons for Designation)	Threats and pressures
<p>Wormley Hoddesdonpark Woods SAC (336.47 ha)</p> <p>Location: Wormley Hoddesdonpark Woods SAC is formed of several fragmented sites located north of the borough and within the 15km boundary buffer. The closest site is 4.3km north of the LBE boundary.</p>	<p>The habitat which is the primary reason for the designation of this site is broadleaved mixed lowland woodland: subAtlantic and medio-European oak Quercus petraea or oakhornbeam Carpinus betula forests.</p>	<p>Threats and pressures on this site include the following:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Disease <input type="checkbox"/> Invasive species <input type="checkbox"/> Air Pollution: risk of atmospheric nitrogen deposition <input type="checkbox"/> Deer <input type="checkbox"/> Vehicles: illicit <input type="checkbox"/> Forestry and woodland management <input type="checkbox"/> Public access / disturbance <p>Disease - Acute Oak Decline (AOD) is present in at least two parts of the site and affects both native oak species, which are key components of this woodland type.</p> <p>Invasive species - Several tree and shrub species not native to the site are present. Where they are not being actively controlled, they are gradually spreading. The more invasive of these include sycamore, turkey oak, rhododendron and snowberry.</p> <p>Air Pollution: risk of atmospheric nitrogen deposition - Nitrogen deposition exceeds the site-relevant critical load for ecosystem protection and hence there is a risk of harmful effects, but the sensitive features are currently considered to be in favourable condition on the site.</p> <p>Deer – Browsing and grazing by deer can reduce tree regeneration and damage the woodland understorey and ground flora. Deer damage levels are currently only moderate and do not appear to be affecting tree regeneration, habitat structure or species composition greatly.</p> <p>Vehicles: illicit - Illegal use of restricted byways and bridleways by off-road vehicles causes localised but sometimes severe rutting and soil compaction, damaging the woodland ground flora, shrubs and trees. Fly-tipping damages the ground flora directly and can introduce toxins and alien species.</p> <p>Forestry and woodland management - The larger woodland units with public access are under appropriate management but some of the smaller, privately-owned units are not which can result in a reduction in structural and species diversity (particularly in previously coppiced areas), the loss of temporary and permanent open space, the over-shading and deterioration of veteran pollards, and the spread of invasive species.</p>

Site	Qualifying Features (Reasons for Designation)	Threats and pressures
		<p>Public Access/Disturbance – As the site is a large, attractive area of ancient woodland with extensive public access and close to large urban centres, it is heavily used by the public for recreational purposes.</p> <p>In addition to the above, the supplementary advice identifies the following</p> <p>vulnerabilities:</p> <p>Vegetation community composition - maintaining or restoring these characteristic and distinctive vegetation types, and the range of types as appropriate, will be important to sustaining the overall habitat feature.</p> <p>Vegetation Structure – open space (for woodland pasture with old trees) - having some open, sunlit and largely tree-less areas as part of the woodland community is often important to facilitate natural tree and shrub regeneration and also to provide supporting habitat for specialist woodland invertebrates, birds, vascular and lower plants. Currently, the areas of open space within the wood-pasture areas are insufficient to meet the desired target.</p> <p>Vegetation structure – dead wood – for this habitat type, old or over-mature elements of the woodland are particularly characteristic and important features, and their continuity should be a priority.</p> <p>Root zones of ancient trees - unless carefully managed, activities such as construction, forestry management and trampling by grazing livestock and human feet during recreational activity may all contribute to excessive soil compaction around ancient trees.</p> <p>Site Improvement Plan: Wormley-Hoddensdonpark Woods, Natural England, April 2015. Available at: http://publications.naturalengland.org.uk/publication/6314181103976448?category=35016.</p>