



Statement of Common Ground

Between

London Borough of Newham

And

Natural England

Stage: Newham Submission Draft Local Plan (Reg. 19)

Date: 10 April 2025

1. Executive Summary

- 1.1. A statement of common ground is a written record of the progress made by plan-making authorities during the process of planning for strategic cross-boundary matters. It documents the strategic matters where effective cooperation has led to cross-boundary challenges and opportunities being identified, whether there is agreement between bodies in how these should be addressed, and how the strategic matters have evolved throughout the plan-making process. It is also a way of demonstrating at examination that plans are deliverable over the plan period, and based on effective joint working across local authority boundaries.
- 1.2. This Statement of Common ground addresses key strategic matters between the two signatories, the London Borough of Newham and Natural England, as relevant to the preparation of the Newham Submission Draft Local Plan and its progression to public Examination.
- 1.3. Strategic matters overseen by other organisations will be addressed in other SoCGs, in order to streamline the process of reaching agreements with each party. Where key strategic issues overlap between different organisations that Newham have signed statements of common ground with (e.g. the delivery of housing targets), these interrelations are summarised in the [Duty to Cooperate Statement](#) (2024) and the Duty to Cooperate Addendum (2025).
- 1.4. The document is intended to be 'live', updated as circumstances change. Please see the Governance Arrangements section of the statement for more details.

2. Parties Involved

- 2.1. Newham Council, the Local Planning Authority for the London Borough of Newham, which is an inner London Borough in East London situated between three rivers: the Lea to the west, Thames to the south and Roding to the east. London Borough of Newham is bordered by several other London Boroughs, including Tower Hamlets, Hackney, Waltham Forest, Redbridge, and Barking and Dagenham. Across the River Thames lies the Royal Borough of Greenwich.

AND

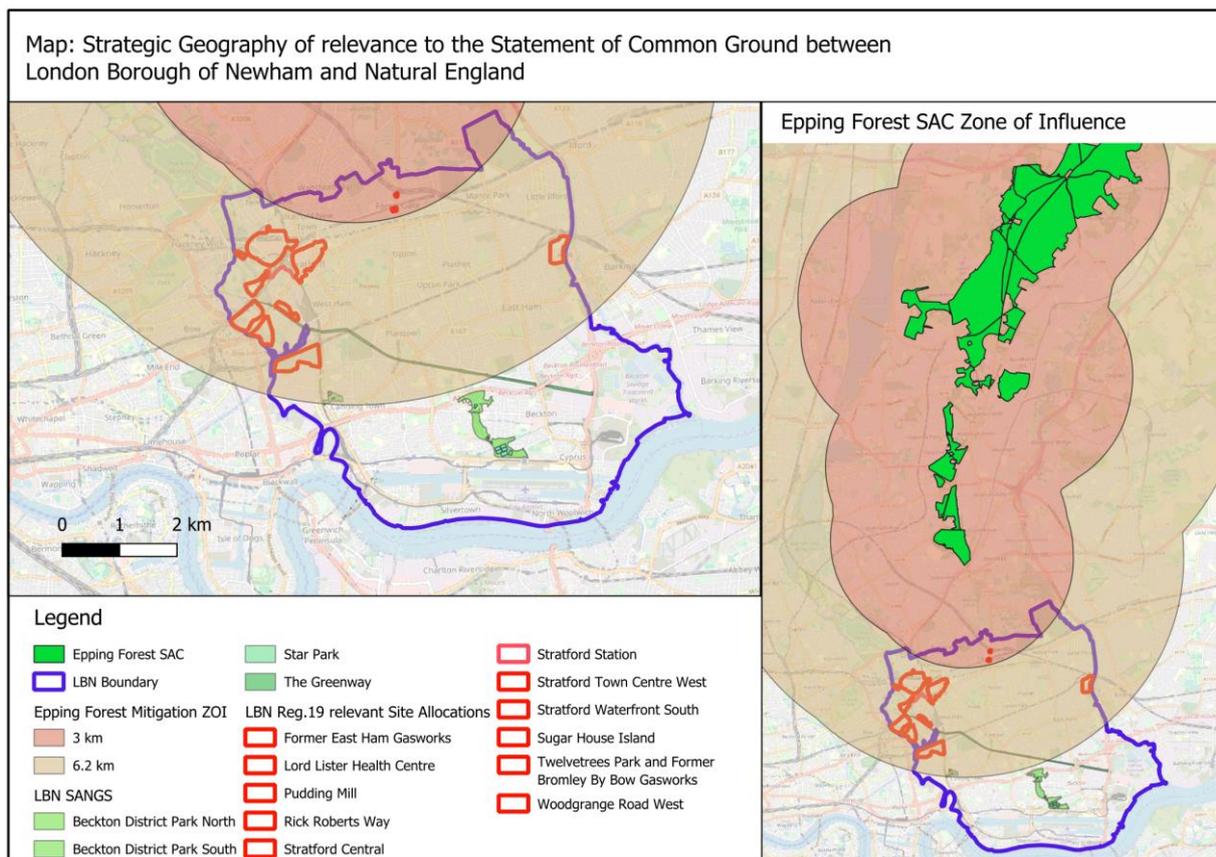
- 2.2. Natural England (NE), the government's adviser body for the natural environment in England. We help to protect and restore our natural world. Natural England is an executive non-departmental public body, sponsored by the [Department for Environment, Food & Rural Affairs](#).
- 2.3. Newham is strategically located at the intersection of the London-Stansted-Cambridge-Peterborough Corridor, which is centred on enterprise and innovation within emerging sectors such as digital, media, life sciences, telecommunications and advanced manufacturing, and the Thames Estuary Creative and Cultural Industries Corridor, which adds to the borough's significance. It contains three Opportunity Areas: the Olympic Legacy (which also includes parts of the other Host Boroughs) Poplar Riverside (which crosses the boundary with Tower Hamlets) and Royal Docks and Beckton, which is also the home of London's only Enterprise Zone and Europe's largest regeneration area.

2.4. The London Legacy Development Corporation (LLDC) Mayoral Development Corporation returned planning powers back to the London Boroughs of Newham, Tower Hamlets and Waltham Forest and Hackney on the 1st of December 2024. As such, key strategic matters for the parts of the LLDC that fall within Newham’s administrative boundaries are also addressed in the new Newham Draft Submission Local Plan, and are subject to the matters addressed in this statement of common ground.

3. Strategic geography

3.1. The map below identifies the spatial representation of the key strategic matters addressed, alongside the administrative area of the plan-making authority – London Borough of Newham.

3.2. As noted above, the LLDC returned planning powers back to the London Borough of Newham on the 1st of December 2024. Where relevant, the Newham draft Local Plan has retained and evolved site allocations and designations from the LLDC Local Plan (2020).



3.3. Epping Forest is London’s largest open space, covering 2,400 hectares of which Epping Forest Special Area of Conservation (SAC) covers 1,600 hectares of Sites of Special Scientific Interest (SSSI) within Greater London and Essex. Epping Forest SAC is experiencing considerable pressure on its habitats from visitors and from air pollution, which have resulted in adverse effects on its sensitive ecosystems. Based on visitor surveys carried out in 2017 and 2019, a 6.2km buffer drawn around the SAC forms the Epping Forest SAC Zone of Influence (Zoi). The

north of London Borough of Newham is partially within this Zol. All residential planning applications which are within the 6.2 km Zol have the potential to have an impact on recreational pressure within the SAC, which must be mitigated through providing contributions to secure avoidance and mitigation measures'. In addition, due to the road network through the SAC, the impact of road trips resulting from growth around the SAC must be assessed to ensure it does not worsen air quality within the SAC.

4. Background

- 4.1. Newham Council prepared the Submission Draft Local Plan and published it for consultation between 19th July and 20th September. This is the version of the plan that the Council considers to be 'legally compliant' and 'sound' and will be submitted to the Planning Inspectorate for examination in 2025. The council undertook two rounds of consultation prior to this, to inform the Newham Submission Draft Local Plan. These were:
 - Issues and Options Consultation, which took place between 18 October and 17 December 2021; and
 - Draft Local Plan Consultation (Regulation 18), which took place between the 9 January and 20 February 2023.
- 4.2. A [Duty to Cooperate Statement](#) (DtC Statement) was published as part of Newham's Reg. 19 consultation, which provides a summary of London Borough of Newham's engagement with Natural England, as a duty to cooperate partner, as part of the preparation of the new Newham Local Plan. The key strategic matter addressed pre-Reg 19 consultation related to Local Plan measures for the Epping Forest SAC protection, and the relevant paragraphs in the DtC Statement are 4.328 to 4.345.
- 4.3. The national and regional policy context forming the background to this statement of common ground is also detailed in the Duty to Cooperate Statement (2024), under 'Chapter 2: Legislative and national policy context', and in 'Chapter 3: Demonstrating compliance with the duty to cooperate' paragraph 3.22 as specific to cooperation with NE.
- 4.4. During the Reg. 19 consultation process, NE submitted comments to Newham that raised the following matters in relation to Epping Forest SAC protection:
 - Concern with the air quality impact assessment, whereby NE were not able to agree with the conclusion that there will be no adverse effect on integrity of Epping Forest SAC as a result of air quality;
 - Noted the positive, ongoing working relationship on the development of a Suitable Alternative Natural Greenspace (SANG) Strategy.
- 4.5. Following further discussions with Natural England, the Newham Suitable Alternative Natural Greenspace (SANG) Strategy (now called the Epping Forest Special Area of Conservation Recreation Mitigation Strategy) has been refined and finalised, and it was further suggested that Newham Council should review the WSP report against other Epping Forest air quality reports recently endorsed by Natural England, and to provide quantitative data to support the qualitative data presented in the WSP report to support their conclusions.

- 4.6. Following review of the above matters, London Borough of Newham invited the NE to begin discussions towards the signing of this Statement of Common Ground.

5. Key Strategic Matters

5.1. Epping Forest SAC protection

- 5.2. Epping Forest is a designated Site of Special Scientific Interest (SSSI) and a portion is designated as a Special Area of Conservation (SAC). SACs are internationally important areas given special protection under the EU's Habitats Directive (92/43/EEC) which is transposed into UK law by the Habitats and Conservation of Species Regulations 2017 as amended (known as the Habitats Regulations).
- 5.3. Newham, as a 'competent authority' under the Habitats Regulations, has a duty to ensure that plans and projects which it has responsibility for consenting will not have an adverse effect on the integrity of the SAC.
- 5.4. Epping Forest SAC is experiencing considerable pressure on its habitats from visitors and from air pollution which have resulted in adverse effects on its sensitive ecosystems. As a result, the conservation objectives for the SAC now include requirements to restore important site features.
- 5.5. A visitor survey was undertaken by Epping Forest District Council as part of their Local Plan preparation to understand where the visitor pressure was originating from. From the survey a Zone of Influence (ZOI) of 6.2km was established around the SAC.
- 5.6. Natural England advised that all authorities within the ZOI would be required to secure avoidance and mitigation measures from developments within the ZOI. Avoidance measures are to be delivered on an individual borough basis but Natural England worked with the affected boroughs and the City of London Conservators of Epping Forest (who manage Epping Forest) to develop an interim Strategic Access Management Measures Plan, which would mitigate the impact of visitor pressure.
- 5.7. Following authorisation from all parties, the Epping Forest SAC Strategic Access Management Measures Strategy Partnership Agreement was formally sealed and agreed in January 2024. Newham has been implementing the Epping Forest SAC Strategic Access Management Measures Strategy Partnership Agreement from the 12th of February 2024.
- 5.8. A brief to commission the Strategic Suitable Alternative Natural Greenspace (SANG) strategy was developed in 2023, using examples and inputs from other councils who had already commissioned such a strategy. Newham Council and NE continued to positively engage throughout the preparation of the strategy, by consultants LUC. A final draft of the strategy (now called the Epping Forest Special Area of Conservation Recreation Mitigation Strategy) was prepared in February 2025. The strategy sets out a fully costed set of interventions to enhance existing public open spaces and active travel links to be delivered across the London Borough of Newham (LBN), in order to mitigate recreational pressure in Epping Forest SAC. The strategy outlines to developers that all new homes built within the Zone of Influence (ZOI)

will be required to make a financial contribution to the delivery of these interventions, which will be implemented by LBN.

5.9. Policy GWS3 in the submission Local Plan secures both sets of contributions to deliver avoidance and mitigation measures. Following completion of the Epping Forest Special Area of Conservation Recreation Mitigation Strategy (2025), the minor amendments set out in the table below have been taken forward to reflect the updated position:

Part of the Plan (para, imp reference, policy part) etc	Minor modification made (any new text in bold and any removed text in strike through)
All about Newham, Evidence base	<p>Epping Forest Special Area of Conservation Recreation Mitigation Strategy (2025)</p> <p>A Strategy to mitigate recreational pressure in Epping Forest Special Area of Conservation (SAC). The strategy sets out:</p> <ul style="list-style-type: none"> • a set of fully costed of interventions to be delivered in the London Borough of Newham (LBN) • Newham's SAC Recreation Mitigation tariff <p>All new homes built within the Zone of Influence (ZOI) will be required to make a financial contribution to the delivery of these interventions.</p>
Policy GWS3	<p>7. The Epping Forest Special Area of Conservation will be protected and enhanced by ensuring that development within 6.2km of the boundary of Epping Forest Special Area of Conservation demonstrates that, if necessary, measures are put in place to avoid or mitigate any potential adverse effects, through:</p> <ol style="list-style-type: none"> a. developments of new net additional residential homes contributing towards the delivery of the agreed Strategic Access Management and Monitoring Strategy; and b. developments of new net additional residential homes contributing to the delivery of Newham’s Epping Forest Special Area of Conservation Recreation Mitigation Strategy. provision of Suitable Alternative Natural Greenspace.
Policy GWS3.7 implementation	<p>The need for Mitigation Strategies adopted by the Council to offset the effects of recreational pressure on Epping Forest Special Area of Conservation have been identified. These strategies will be reviewed and updated as required over the plan period. Currently the Council is working with partners to develop a package of mitigation measures which fall into two categories:</p> <ul style="list-style-type: none"> • Strategic Access Monitoring and Management Strategy, which was adopted by Cabinet in July 2022. • Newham Special Area of Conservation Recreation Mitigation

	Strategy (2025) , which is being developed and will be published as additional guidance.
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- 5.10. In August 2023, Newham commissioned WSP, who are undertaking the Habitats Regulation Assessment as part of the Integrated Impact Assessment for the Local Plan, to also undertake an Air Quality Impact Assessment for Epping Forest SAC. The outcome of this assessment formed part of the Habitat Regulation Assessment for the draft submission Local Plan.
- 5.11. Following comments raised by NE at Regulation 19 stage, Newham Council reviewed the WSP report against other Epping Forest air quality reports recently endorsed by Natural England, to provide quantitative data to support the qualitative data presented in the WSP report to support their conclusions. This assessment was shared with Natural England, who confirmed that they are happy with the revised data and the resulting conclusions of minimal air quality impacts on the Epping Forest SAC. The report will be published as part of an updated IIA/HRA.
- 5.12. For completeness, Newham also shared its draft responses to NE's full representation comments. NE noted the responses, which reflected the additional work undertaken as set out above, and indicated they have no further concerns.
- 5.13. Record of agreements and/or disagreements:
- Natural England are satisfied with LBN's further analysis of the air quality modelling, and agree that trip generation resulting from the development proposed by the Local Plan is not likely to lead to likely significant effect on the Epping Forest SAC.
 - Natural England agree that the Epping Forest Special Area of Conservation Recreation Mitigation Strategy (2025) provides a suitable strategy to mitigate recreational pressure in Epping Forest SAC.
 - Natural England note Newham's response to representations made, and have no further concerns.
 - London Borough of Newham agree to undertake a review of the IIA/HRA, to integrate the latest work undertaken.

6. Governance agreements

- 6.1. This statement of common ground will be reviewed:
- 6.1..1. Whenever agreement is reached on any outstanding matters. Or
 - 6.1..2. At key milestones in progress towards addressing strategic matters. Or
 - 6.1..3. At each subsequent key stage of the plan making process, as it progresses towards adoption.

7. Signatories

- 7.1. We confirm that the information in this statement and referred to documents reflects the joint working to date undertaken between London Borough of Newham and Natural England towards addressing the identified strategic matters.

Signed on behalf of London Borough of Newham:



Name: Ellie Kuper Thomas

Date: 09/04/2025

Position: Policy Manager, Planning and Development Directorate

Signed on behalf of Natural England:



Name: Bella Jack

Date: 10/04/2025

Position: Principal Manager, Thames Solent Area Team