

Waltham Forest Town Hall, Forest Road, Walthamstow, E17 4JF

Ask for: Ian Rae
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28th September 2022

Dear Mrs S Housden & Mrs C Jack,

Waltham Forest Local Plan

1. Introduction

1.1 This letter has been jointly prepared by Senior Officers at the London Borough of Waltham Forest (LBWF) and Natural England (NE) to capture the progress made through collaboration between the two bodies on the Waltham Forest Local Plan (Part 1). It recognises the strategic importance of the Plan to both authorities and expresses support for its adoption following a second stage of Examination in Public.

2. Background

2.1 In your initial findings following the first stage of Examination in Public, you were unable to conclude that the Waltham Forest Local Plan (Part 1) would not result in adverse effects on the integrity of the Epping Forest Special Area of Conservation (SAC) because of recreational pressure and air quality.

2.2 To fully address your concerns relating to recreational pressure on the Epping Forest SAC, LBWF has undertaken a review of its draft Suitable Alternative Natural Greenspace Strategy (SANG Strategy) and developed a new methodology and strategy, in consultation with NE, that demonstrates the capacity, quality and deliverability of SANGs in the borough.

2.3 To fully address your concerns about air quality, LBWF has prepared a new Air Quality Study, again in consultation with NE, to demonstrate the specific impact of planned growth in Waltham Forest on air quality across the borough, including the Epping Forest SAC.

2.4 LBWF and NE have worked together positively to agree the approach to both workstreams and to identify the measures that will be necessary to ensure that the Waltham Forest Local Plan will have a positive impact on the Epping Forest SAC.

3. Collaborative Approach to SANGs

- 3.1 To demonstrate the capacity for deliverable SANGs across the borough, the Council has prepared a new SANG Strategy in collaboration with Natural England, the City of London Corporation and Lee Valley Regional Park Authority. In recognition of the urban context of Waltham Forest, the Council have developed a bespoke methodology to calculate the uplift in visitor numbers that could be expected from planned growth in the borough, and identified, in collaboration with NE, the greenspaces in the borough that should be designated as SANGs to accommodate this uplift and mitigate recreational pressures on the SAC.
- 3.2 The new strategy sets out the investment that would be needed in these spaces to meet the requirements of SANGs and accommodate the identified uplift in visitor numbers. It also goes on to set out how this investment would be funded through the Community Infrastructure Levy, along with other sources of funding where appropriate, and makes clear commitments for ongoing monitoring and governance.
- 3.3 The Council and Natural England have cooperated significantly on this matter since May, working together proactively to find a resolution that is suitable for the specific context of Waltham Forest. We have met on seven occasions between the end of May and beginning of September to discuss the matter, including a full day of site visits around the borough. We have also maintained an ongoing dialogue via email.
- 3.4 To date, other SANG strategies agreed with Natural England have applied a methodology which is derived from specific conditions in the Thames Basin Heaths. It is recognised that this is not always appropriate in a more urban context, like Waltham Forest, and it is for this reason that Waltham Forest have developed the bespoke methodology referred to above. As the first authority to develop a bespoke methodology in detail, Natural England need time nationally to give the Waltham Forest approach due diligence.

4. Collaborative Approach to Air Quality

- 4.1 In relation to air quality, LBWF and their air quality consultants WSP, have worked collaboratively with NE to produce a new Air Quality Study. The new study is based on a Trip Generation and Distribution Assessment of the most significant developable sites included within the Local Plan and shows the impact planned growth in Waltham Forest would have on the local highway network, including sensitive receptors in Epping Forest.
- 4.2 The assessment has used industry standard methodology for assessing the traffic impact of development, both in terms of the existing and expected trip generation at each site and how those trips would be distributed across the local highway network.
- 4.3 The results demonstrate an overall reduction in trips across the borough thanks to the progressive policies of the Local Plan, which would see existing unconstrained car generating land uses with high levels of car parking replaced with car free development with robust management of servicing and deliveries, alongside significant investment in public transport and cycle and pedestrian infrastructure.

4.4 This would include a reduction in trips on the majority of roads within 200m of the SAC. Any increases on roads within 200m of the SAC will be very minor (less than 10 AADT), which is too small to noticeably increase levels of nitrogen oxides, ammonia and nitrogen deposition. As a result, it is concluded that there would be no likely significant effects on air quality, and therefore there is no need for further appropriate assessment.

4.5 The Council and NE have also cooperated significantly on this matter since May, working together proactively to find a resolution that identifies transparently the impact on air quality of planned growth in Waltham Forest. We have met on six occasions between the end of May and beginning of September to discuss the matter and maintained an ongoing dialogue via email.

5. Summary

5.1 LBWF and NE are fully aligned in their objectives and committed to working together to ensure the Epping Forest SAC is protected from planned growth in Waltham Forest. Proactive and ongoing collaboration between both organisations has resulted in significant progress being made to address NE's challenges to the soundness of Waltham Forest's Local Plan (Part 1). To summarise the current position:

- We are working proactively on a way forward in relation to SANGs, which we hope to have agreement upon by the end of October 2022.
- We are awaiting technical review of the new Air Quality Study by Natural England's Specialist Team.

5.2 Both parties are also committed to ongoing collaboration to achieve timely adoption of the Local Plan and ensure that it is effectively implemented, and our shared objectives are realised.

Yours sincerely,

London Borough of Waltham Forest

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Role: Corporate Director – Regeneration, Planning & Delivery



Natural England

Name: Marc Turner

Role: Senior Planning Adviser, Thames Solent Team

