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The Planning Inspectorate

BY EMAIL ONLY

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Dear Mrs Housden and Mrs Jack

Waltham Forest Local Plan (LP1) 'Shaping the Borough Examination' – Matters, Issues and Questions

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.

At the original set of hearings, Natural England had significant soundness concerns relating to the London Borough of Waltham Forest's (LBWF) Habitats Regulations Assessment accompanying Local Plan Part 1. These specifically related to the matters of Air Quality and Recreational Disturbance (SANG Delivery).

Subsequently LBWF have spent the time working hard on addressing Natural England's concerns. The submitted Statement of Common Ground between ourselves and LBWF demonstrates that Natural England are now satisfied with the documentation provided. All challenge from Natural England is now removed.

Please find our advice on the new Matters, Issues and Questions below.

Habitats Regulations Assessment – Air Quality

Regarding questions 1.1 to 1.4 inclusive. These are technical queries relating directly to the assessment conducted by the consultants for LBWF. We suggest answers to these are sought directly through LBWF from those consultants, the authors of the report.

Turning to 1.5, Natural England have reviewed the Air Quality documentation both at an Area Team and National level and have no specific comments upon it. This assessment methodology is more robust than previous iterations.

In terms of question 1.6, we are of the opinion that the plan alone and in combination will not have an effect upon the integrity of the SAC from Air Quality.

Habitats Regulations Assessment – Suitable Alternative Natural Greenspace (SANG)

This is the first local plan test of the set of circumstances posed by recreational pressure issues on Epping Forest SAC in such a densely populated area. Natural England's SANG guidelines were developed for the Thames Basin Heaths and are designed to be applied in a rural or peri-urban setting. Given the differences between the Thames Basin Heath setting and Waltham Forest, we feel a locally designed approach is both pragmatic and precautionary.

The methodology is in a stronger, more robust position than the version of the Strategy that was produced in March 2022. Aligned with safeguards afforded by a substantial monitoring package and policy wording changes allowing fall back positions, we have felt able to remove our challenge of soundness around these matters.

Specifically relating to question 1.8, many other Local Planning Authorities around the country use the CIL mechanism to secure SANG contributions. Woking Borough Council are one such example. LBWF have more information on this matter.

The above allows Natural England to respond positively to question 1.9. We are of the opinion the approach is sufficiently developed to support the HRA conclusion within Local Plan Part 1.

Yours faithfully,

Marc Turner
Principal Planning Adviser – Sustainable Development
Flexible casework Team