

## Shaping the Borough' Waltham Forest Local Plan (LP1)

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### A. Introduction

In 2020 I commented on the London Borough of Waltham Forest's draft local plan (2020-2035). This was in collaboration with a number of long standing residents of the Borough.. Collectively we have attended most consultation events since 2017.

Our comments were included in the 'spreadsheets of comments' recorded on the Borough's website pages related to the consultation process, although no feedback has been received.

### B Comments on the Consultation Process

1. I recognise that the Development Plan is a legal requirement and has to conform to central government guidelines, and represents a great deal of work by LBWF and its consultants.
2. However the abundance of material, and the fact consultations on LP1 and LP2 took place in parallel made it difficult to be sure what one was being consulted about, and some documentation called for was not available until the very end of the process eg. The Infrastructure Delivery Plan.
3. The problems caused by this approach were highlighted at a meeting regarding sites in Station Road North Chingford where it appeared conservation officers were unaware of proposals to build taller buildings in the Station Road area.
4. There were issues with the consultation process associated with the use of online technologies and the clunkiness of the planning portal. One can challenge whether any web based consultation process can be considered to be inclusive of the whole population.
5. The current draft documents represent an improvement on previous versions. This is seen in the LP2 proposals, where sites have been modified.
6. Comments on the Plan website demonstrate many residents feel they are not being listened to.
7. In my previous submission I suggested that an essential part of the development of the plan should have been using master plans, possibly developed with residents through citizen's assemblies. Belatedly some master plans have emerged, but residents are still being asked to comment on individual site allocations without reference to them.

### C. Comments on the Background to the Plan

8. Since the consultation process began in 2017 a number of factors have changed, most notably the impact of Brexit and COVID-19, but also measures needed to tackle the climate emergency<sup>1</sup>
9. The Plan is intended to cover the period 2020-2035, yet we are now in 2022. It would seem sensible to change the dates to 2022-2037 and allow an update of parameters to include data from the 2022 census.
10. This seems particularly sensible given that a main driver for the plan is housing targets.

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<sup>1</sup>The figures in the supporting documentation suggest people in their 20s are leaving the Borough [https://www.walthamforest.gov.uk/sites/default/files/Waltham%20Forest%20Proposed%20Submission%20Local%20Plan%20SA%20Report%20Appendix%20B%20Baseline%20Data\\_2%20Reg%2019.pdf](https://www.walthamforest.gov.uk/sites/default/files/Waltham%20Forest%20Proposed%20Submission%20Local%20Plan%20SA%20Report%20Appendix%20B%20Baseline%20Data_2%20Reg%2019.pdf)

11. In fact the Council has chosen to set their own targets beyond those set down to 2029 by the GLA, and more broadly down to 2035, preferring a target of c 1800 pa, or 27000 homes by 2035 (LP1 Policy 2/para 4.7) when the London Plan 2021 (p. 163 Table 4) set a target of 1264 pa to 2029 for Waltham Forest, and the Waltham Forest Growth Capacity Study (2018) concludes a 15 year total of 16253-21777 homes is achievable. Given the size of the Borough's housing waiting list one can understand why it has chosen to be more ambitious, but it is not clear that the developments being envisaged would tackle this at all.
12. Without clarity of understanding on how the housing targets have been developed the consultation is essentially flawed.
13. Intensification driven by these housing targets will create problems of its own and highlight internal contradictions within the LP1 document regarding impact of development on the existing built environment, and the environs of Epping Forest and other green areas.
14. It is suggested that consideration of LP2 should be delayed until clarity is obtained on the housing targets contained in LP1 through the planning hearings.
15. Policy 8 intensification is one area where dialogue with local residents and stakeholders is vital, as has been seen with the reception of potential developments at Highams Park, Fulborne Road, Larkshall Leisure Centre, and Chingford Green. There is an unsubstantiated assumption in policy 8 that a Characterisation study will support developments, but stakeholders have not been convinced so far.

#### **D. The plan for the North of the Borough**

16. Work on the north of the Borough does not appear as thorough as elsewhere, for example leisure and retail facilities omitted; Station Road was not considered in a cultural survey, despite it having far more cultural activity of the type noted for South Chingford.
17. Section 7.1, the introduction to planning background for the north of the Borough is disappointing, and could provide an upbeat characterisation of the area, as well as noting areas of deprivation and poor public transport connectivity.
18. The accompanying Policies map<sup>2</sup> is not consistent with maps presented in the draft policy. Suggested changes include : Station Road Chingford retail centre should be extended to include Kings road, Hatch centre should include the parades on the opposite side of Hatch lane (shown on map on p12 LP1) the map misses out local centres at Valleyside, Oak Hill (Highams Park), and Wadham Way, and on the Chingford Hall Estate; a possible greenway route could be added from New road to Station road using remnants of Epping forest, and then via Larkswood etc to the North Circular, also across to Highams Park station
19. Section 2.5 omits Friday Hill estate, a splendid example of a post war public housing
20. Section 2.9 should refer to sports facilities north of the North Circular eg cricket clubs, Arsenal training ground, David Lloyd centre etc and the yachting facilities on the reservoirs
21. Section 7.3 should refer to the post war housing estates at Yardley Lane and Friday Hill, and the Aldriche and Chingford Hall estates, and the Dogtrack development. As written it is misleading about the character of the north of the Borough .
22. Page 47 This vision could make direct reference to the 15 minute city being realised by increased use of the existing centres, and the North Circular corridor.
23. Section 9 has virtually nothing to say about employment opportunities in the north of the borough.

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<sup>2</sup>[https://www.walthamforest.gov.uk/sites/default/files/WF\\_\\_Reg19\\_Policies%20Map\\_Compress.pdf](https://www.walthamforest.gov.uk/sites/default/files/WF__Reg19_Policies%20Map_Compress.pdf)

24. Section 10 likewise makes little reference to the north of the Borough. Most is more than 20 minutes away from Walthamstow. Some idea of how existing cultural venues and future creative industries will be encouraged is needed.
25. Section 11-Not all the local retail parades in the north of the Borough have been recognised.
26. Section 12 parts of the north of the Borough are deficient in Library provision and facilities for pre school children. There is no provision of adult education in the north of the Borough.
27. Section 15 Active transport The map 15.2 illustrates the inadequacy of cycle infrastructure in the north of the borough. It shows two 'quiet' routes from the north circular to Chingford Station, but no connectivity to Walthamstow Town Centre. Potential east west routes and potential Green Routes are not included there.
28. Policy 68 on car parking has given rise to many critical comments at consultation meetings. Residents do not believe it is realistic in an area of high private vehicle dependency.

### **E. The Hall Farm Curve**

1. Shortcomings of the draft plan, and the supporting infrastructure strategy report, not available in the consultation period, can be seen in relation to the Hall Farm Rail Curve.
2. The Curve should feature more positively and promptly in the London Borough of Waltham Forest's Development Plan LP1. It is mentioned briefly in para 15.20 as an aspiration yet is currently omitted from Policy 3 'Infrastructure for growth', despite its potential for supporting the six 'golden threads' (Para 3.1) especially development across the Borough and encouraging low carbon transport, a modal shift from private cars to public transport, and the much repeated aim of 15 minute neighbourhoods.
3. The Hall Farm Curve linked the railway lines up the Lea Valley from Stratford to the line from Liverpool Street to Walthamstow and Chingford. It was part of the original route from central London to Walthamstow. It was electrified and continued in use until the late 1960s when, although the track was removed, the track-bed was left.
4. Over the last 25 years arguments in favour of reinstating the curve have grown:
  - A. To provide resilience in the public transport network by providing an alternative overground route from the Borough to Central London via Stratford
  - B. To provide a direct rail connection from the centre and north of the Borough to Stratford, London's busiest railway hub station in terms of passenger numbers (2020/21)
  - C. To provide a direct low carbon transport link between the centre and north of the Borough with one of the largest growth areas in London-the 'EastBank'
  - D. To provide a fast reliable low carbon transport link north south uniting the whole Borough for the first time since its creation nearly 60 years ago
  - E. To enable residents to take full advantage of the leisure and employment opportunities along it without recourse to private transport or the delays associated with rush hour public road transport
  - F. To link new residents and new employment opportunities in the proposed growth area around Lea Bridge and Ruckholt Road with the rest of the Borough.
5. As a consequence a number of community and pressure groups have been campaigning for the reinstatement of the curve
6. Waltham Forest Council established a Working Group to take the matter forward over the last 3 years, rebadging the proposal the Meridian Line in recognition of its alignment with the Greenwich Meridian and the aspiration to link the Borough with public transport south of the Thames.
7. According to the Arup Strategic Transport Review (2020) the Chingford Liverpool Street line is seen operating at capacity and the Hall Farm curve is suggested as a solution (p.50)
8. The Arup Strategic Transport Review of May 2020 recognises in its Executive Summary the lack of internal connections not-south in the Borough, and the concentration of transport infrastructure both of the A 406
9. Its significance as a public transport artery can be seen by reference to Fig. 3.2; it would link 4 district centres- North Chingford, Highams park, Wood Street and Ruckholt Road, one major

centre (Walthamstow), a Strategic Industrial Centre (Low Hall/Lea Bridge,) and 6 strategic growth areas, all to Stratford.

10. From its submission 'TfL supports the principles of improving connectivity between Waltham Forest and Stratford. This was the key motivation behind the reinstatement of the Hall Farm Curve.'
11. The reasons for reinstating the curve are clear. To travel from the Chingford line to Stratford currently one can:
  - G. Take the Chingford Line to Liverpool Street Station and change to the Central line or National Rail
  - H. Take the Chingford Line to Hackney Downs and change to the Overground from Hackney Central on the Gospel Oak to Stratford service
  - I. Take the Chingford Line to Walthamstow Central, take the Victoria Line to Tottenham Hale and then the Lea Valley Line to Stratford

All involve changes, some physically difficult, and take travellers to busy places they do not want to visit, as well as probably doubling journey times compared with the Hall farm curve route.

12. Paragraph 2.7 LP1 notes the public transport deficit in the north west of the Borough. This is clear in the Arup report (2020 Fig 24). Improved bus, walking and cycling links to the stations on the Chingford line could help address this, but are not shown in the main report.
13. Reinstatement of the Hall Farm curve would provide residents with access to the Olympic Park described as an asset in 2.9 but currently not accessible readily by public transport from the north and centre of the Borough.
14. It would also open up the increasingly varied cultural and leisure offerings around Wood Street, Highams Park and Chingford Station to residents of Leyton and the southern Lea Valley.
15. The Borough vision for 2035 refers to the UK Innovation Corridor. In the period of the proposed plan the Hall Farm Curve provides the only opportunity to improve connectivity to the corridor. Crossrail 2 is unlikely to be built before 2035.
16. TfL in its submission suggests there is no platform capacity at Stratford for a link to the Chingford line, providing a fantastical figure of £400 million for work at Stratford. The recent (2016) SYSTRA report on the curve suggests a half hourly service can be introduced using the existing platforms, while Network Rail estimated the cost of the work in 2014 at up to £20 million. To put the TfL figure in perspective the completely new Meridian Water Station cost £40 million, while the complex underground station interchanges on Crossrail 1 at Whitechapel and Paddington are costing £831M, and £538M respectively.
17. TfL also raise concerns about congestion at the Highams Park level crossing, but local motorists can easily avoid the crossing, and no such objections were raised when Chingford was recently fitted out as a depot for TfL overground services.
18. The Hall Farm Curve is included as a long term objective in the Infrastructure delivery plan (Appendix 1 project 8), presumably because of the TfL objections without consideration of the SYSTRA report in support of its feasibility. However, without the curve the new station at Ruckholt Road will be of little use to the Borough more generally, and do little to dispel a sense of that area being cut off from the rest of the Borough.
19. The Vision for the south recognises the opportunities for remedying historical deprivation, but omits mention of reopening the Hall Farm curve to enable residents there to enjoy facilities of the central Walthamstow area, while the employment opportunities of the new development should be made accessible across the borough
20. The Hall Farm Curve should therefore be incorporated in Policy 3 Infrastructure for growth, pp. 18-19.
21. It would enhance Walthamstow as a transport hub. Wood Street Station, on the Chingford line, is the closest rail station to the Whipps Cross development and would enable users of the new hospital and its workforce, and the new residents there to access the rail network at Stratford.
22. Much of the planned additional 27,000+ (policy 4 p. 20) units of housing will require access to public transport to enable residents to reach employment and leisure opportunities across the Borough and beyond. Many of these units are planned within easy walking and cycling distance of the Meridian line stations.
23. Section 9 Building a resilient and creative economy makes reference to the need to provide more employment opportunities, which the Hall Farm Curve would enable.
24. Policy 34 speaks of local jobs for local people, but this needs efficient transport links to make a reality. Without the curve residents in the centre and north of the Borough would have to use

(private) road transport to access the Ruckholt Road growth area, with journey times of 60-90 minutes by bus in the rush hours- a massive deterrent. Whipps Cross hospital already experiences recruitment problems because of difficult public transport access; the Hall Farm curve could help alleviate that.

25. Policy 36 Promoting culture and creativity recognises in para B the importance of public transport access in encouraging cultural venues. The Hall Farm curve would facilitate two way public transport access to the cultural offerings of the Borough and East Bank.
26. Policy 48 Social and community infrastructure recognises the need for collocation of good public transport with soft infrastructure. Two element of good public transport are choice of destinations without changes, and speed/reliability. Without these potential users will use other forms of travel or chose alternative facilities.
27. Policy 62 speaks of promoting sustainable transport. For people to use public transport as part of their everyday life-it needs to take people to get where they need to go or might want to easily, and encourage healthy streets by taking traffic off the roads. The Hall Farm curve will facilitate this.
28. \Policy 63 active travel speaks of making transport hubs more attractive; one aspect is in terms of choice of destinations -which the Hall Farm Curve will enhance.
29. Policy 64 on Public Transport talks of development being integrated with public transport. The Chingford line will be a key to this and with the Hall Farm curve and improvements elsewhere have the potential to what was a sleepy suburban line to an effective commuter route providing access to leisure facilities and work across north east London. It should be explicitly mentioned in this context.

#### Conclusions

- I. The Arup Strategic Transport Review notes the absence of a north -south internal transport link. It also notes p. 60 and elsewhere the absence of an evidence base in LP1 for the transport network
- II. The Hall Farm Curve offers the potential to enable LBWF to realise many of its policies, either directly or as an enabler.
- III. While it is recognised that work needs to be done to confirm the engineering and service delivery, and associated project costs to enable funding to be raised and the work to be included in TfL/Network Rail programmes, the development plan LP1 should include specific reference to the Hall Farm Curve whenever relevant to policies
- IV. It is suggested para 2.6b is rewritten to explicitly commit to advancing the Hall Farm Curve through discussion with TfL and other stakeholders
- V. Policy 3 Infrastructure for growth should be rewritten at para 3A to include The Hall Farm curve, with more appropriate reference to the Whipps Cross development in this section
- VI. Figure 3.2 should be modified to include both the route of the Hall Farm Curve and Ruckholt Road Station
- VII. Policy 64 should include reference to the Hall Farm Curve
- VIII. Nothing is said in the plan about provision for travel beyond the Borough, particularly to the north and east, although this may represent most scope for regional economic growth in the future. This needs to be looked at