

## Written Representation to Waltham Forest Local Plan Examination

David Matson

### Reference: Matter 2/ Issue 2/ Question 29:

In my Regulation 19 submission, I called for clarity as to how the Local Plan had established a housing target of 1800 homes pa. This has not been provided.

I have two concerns:

- The quality of consultation
- The logic underlying the scale of housing development.

### Consultation:

The number of housing units sought drives intense development on individual sites, despite the often contrary views of local residents.

In fact, too often consultation meetings on the Local Plan became a “hunt” for housing development sites rather than a consideration of a broader “vision” for an area, and then, project ideas. There is a danger that this overly forceful approach will poison future consultation on local area masterplans because the scale and location of major development is already known – as LP2 has been considered alongside LP1. There has been no intermediate process of master planning in cooperation with the local community.

Public consultation is a delicate process, not one to undermine with an overly forceful target setting outside the knowledge and understanding of the public.

### The Scale of Development:

Secondly, the text does not set out how the housing targets have been arrived at, and why they diverge from the targets established in the London Plan.

Policy 2/para.4.7 merely asserts a target of 27,000 homes (or 1800 pa) and refers the reader on to section 8 for justification. Para. 8.4 asserts the numbers can be found in the GLA Strategic Housing Land Availability Assessment (SHLAA) and the Waltham Forest Growth Capacity Study 2018.

Further examination shows:

- (1) London Plan 2021 (pg.163, Table 4), using figures from SHLAA: 10 Year targets for net housing completions for Waltham Forest to 2029: 1264 pa.
- (2) Waltham Forest Growth Capacity Study 2018 concludes that a 15 year total between 16,253 (1084 pa) and 21,777 (1452 pa), not 27,000 (1800 pa), can be achieved.

In the welter of figures available, the Local Plan offers no compelling explanation as to why its own target should be the one adopted by the Council and the community, and why.

As the Local Plan says (para. 1.11), the Local Plan should be “in general conformity with the London Plan”. There is currently no compelling argument made for divergence from the London Plan.

### Suggested Change:

Clear reasoned justification of housing targets, and divergence from the London Plan, if appropriate, within the Local Plan document. Otherwise, it is unclear that the draft Plan is sound.

**Reference: Matter 2/ Issue 3/ Questions 35 & Q37:**

With regard to Policies 5 and 11, in District Centres, I called for masterplans conducted with local residents and businesses . A number of masterplans are now being conducted, as “Frameworks”, with local participation, for example at Chingford Mount, South Leytonstone, Leytonstone, and Lea Bridge. This is to be commended, if late.

Similar action should be taken in other locations, as soon as possible, to engage local residents and business interests. May I suggest Station Road, Chingford, because of its varied interests, and Sewardstone Road, because of the uncertainty that currently exists.

**Suggested Change:** Within Policies 5 and 11, “active pursuit of masterplans, consulting residents, businesses and property interests, in all Strategic Locations and District Centres”.

**Reference: Matter 6/ Issue 1/ Question 151:**

With regard to Policy 11, I queried how policies for local distinctiveness and taller buildings could be reconciled. I recommended resolving any conflicting issues by instituting early masterplans.

I am encouraged that there is now to be an additional clause, “T: Support and encourage master planning approaches where possible to deliver the benefits of cohesive high quality design”.

However, I fear the conflict may have only been sharpened if the master planning is finalised after LP2 is agreed. For example, in Station Road, Chingford, one major issue for debate in masterplan consultation is sure to be the potential for an extension of the Chingford Green Conservation Area to incorporate Station Road as an example of Victorian retail architecture. Any such designation is bound to sit uncomfortably with high rise buildings, even if they are an “allocation”.

Heritage is a key component of the character and distinctiveness of our built environment. It is appropriate to consider heritage earlier than any potentially intrusive additions to the townscape are agreed.

**Suggested Change:** Within Policies 11 and 74, “initiate a review of existing Conservation Areas to consider any appropriate extensions before adoption of the LP2 document”.