

Dear Andrea

While local people appreciate the opportunity to input into the local planning process, I would like the inspectors to note that that the process is challenging for those who have a deep understanding of their community and its needs but are not planning or development professionals. The jargon is, at times, impenetrable and the time required to pour over documents inadequate for people who lead busy lives and are doing this on an unpaid basis. The outcomes will affect us in myriad ways, but there will be times when we are not able to frame our concerns within official parameters. I hope, therefore, that the inspectors will - where necessary - see through to the spirit of the comments and concerns if they are not always framed in the required format.

I also have another general comment to make: it seems to me that Waltham Forest Council have found ways to justify their original local plan rather than make fundamental changes to it in the face of local opposition and the inspectors' concerns. I implore the inspectors to hold the Council to account and to do what they can, within their powers, to protect Waltham Forest from overdevelopment that will harm the character of the area, the quality of life of people already living here, and our precious open spaces.

I would like to address comments at point 1.9 of the 'Further matters, issues and questions'. That is, 'Overall, is the draft SANGs Strategy sufficiently developed to support the HRA's conclusion that there will be no adverse effect on the integrity of the Epping Forest SAC arising from recreation pressure?' My answer is a resounding 'no' for four reasons:

- 1) The Council's SANGs strategy is based on quantitative calculations, moving people around their green spaces as if they are numbers on a spreadsheet. There is absolutely no qualitative evidence to suggest that people will behave as the Council supposes and this means the strategy is insufficiently developed and cannot support the conclusions it reaches. It is, to my mind, only a first step in understanding what people will do: you must talk to people, and really understand what they are telling you, to reach robust conclusions.

- 2) The SANGs strategy seems largely based on encouraging people to turn away from Epping Forest SAC and towards existing green spaces which will be 'improved' to attract them. This is asking people to eat apples when they want pears. Epping Forest SAC is largely un-manicured: people visit Epping Forest to

feel immersed in nature, to be surrounded by trees and open space and to lift their heads and see the sky not tall buildings. Most of the sites the Council is proposing will take additional pressure off Epping Forest SAC are existing parks and town squares within the borough: no amount of changes to those spaces will turn them into something other than parks surrounded by built-up areas. People will continue to travel to Epping Forest SAC to experience the freedom from development they crave, all the more so when the buildings the Council wants to build are built. Increasing Waltham Forest's population will further degrade Epping Forest SAC; no amount of hoping and wishing people will go elsewhere will mitigate that.

3) Furthermore, many of the proposed replacement SANGs will not take the pressure off Epping Forest that the Council is claiming they will, because of the Council's policy of renting out the borough's parks and open spaces for events. For example, large parts of Leyton Jubilee Park are frequently fenced off by Waltham Forest Council for all sorts of different events. And the Lee Valley Regional Park has long-term plans to give the Waterworks over to large-scale events. This has a ripple effect, pushing people further and further to find a quiet place to relax and spend time in nature. It also makes Epping Forest SAC - which we know will be unaffected by events - a much more attractive destination for a walk.

4) Waltham Forest has already floated plans to build on Low Hall Sports Ground and the Lee Valley Regional Park Authority is in talks to build on Eton Manor, and there may be other plans for other sites that I do not know about. Already the green spaces designated as proposed SANGs to protect Epping Forest SAC are, themselves, under threat. Of course, if the planning system was able to protect the proposed SANGs from development in perpetuity, to enshrine their role in mitigating the impact of population increase on Epping Forest SAC, then this point would be moot. But I cannot see how, in its current state, the planning system can do that. There is a very real likelihood that this local plan, if approved in its current form, will see significant harm to Epping Forest SAC and an overall reduction in green open space in the borough.

In conclusion, the draft SANGs strategy is not sufficiently developed and is based on erroneous assumptions, and cannot support the HRA's conclusion that there will be no adverse effect on the integrity of the Epping Forest SAC arising from recreation pressure.

With best wishes

Abigail

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