

## **Hearing Statement by Roger Gillham for Meridian Line Joint Working Group and Chingford Line Rail User Group**

to the Examination in Public to be heard February 2022 regarding the Waltham Forest Local Plan LP1 'Shaping the Borough' 2020 – 2035

### **Matter 7 Communities and Infrastructure**

Waltham Forest Council's Local Plan 2020-35 should tell residents what we would like the borough to look like in 15 years time. My emphasis is on 'we'. The Council consulted on the plan so the document produced should reflect both what the Council and what we the residents believe is the best way forward.

Sadly, this joint endeavour has not so far succeed in the document's consideration of the Hall Farm Curve (HFC) project, now renamed the Meridian Line. This scheme would enable rail services from the Chingford and Walthamstow Overground line to link into the Lea Valley Line to Stratford, opening up London's burgeoning East Bank, Docklands and East London to Waltham Forest residents, and enhancing the infrastructure of the Stratford Cambridge Innovation Corridor.

Reference is made in the 2020 submission document to the HFC but it has been demoted from a Priority scheme to a long term aspiration (para 15.20 page 150). The Council, in Policy 3 – 'Infrastructure for Growth' has chosen which schemes to designate as 'Priority'. The authors of the 2019 and 2020 versions of the Local Plan have failed to appreciate the importance of considering the high benefit cost ratio of the Hall Farm Curve project, with low carbon emission and minimum pollution compared with private cars. Rail is fast, and HFC would be a mode changing project which will get people out of their cars. It will meet one of the six 'Golden Threads', to 'ensure growth is sustainable and supported by infrastructure'. It's benefits are far greater than new, more expensive, station on the Lea Valley line, with no easy connection to the centre at Walthamstow if there is no HFC. There should be a study to determine if the scheme can be shown to use existing platforms 11 and 12 at Stratford, not require new platforms.

The Meridian Line (HFC) would link 7 or 8 stations in WF and at Stratford, all of which will have thousands of new housing units and massive new employment workspaces under the Policy 2, Scale of Growth.

Unfortunately, as was made clear in my submission in December 2020 made clear, the final 2020 version of LP1 submitted for Examination concealed the removal of the HFC project from the list of changes, and hence that WF was deprioritising the HFC compared with other rail schemes such as Ruckholt Road Station. This was not consulted across WF.

In the 2019 version of WF's Local Plan, it was noted that the HFC project was a priority scheme for WF Council in the previous Local Plan, '2012 Core Strategy policy map'. This was recorded in the July 2019 version of the plan entitled 'Shaping the Borough – Waltham Forest Draft Local Plan (July 2019)' in the section called '1 Policies Map Changes' which starts at page 215. This document was on the council's website as a 41 page appendix file 'Final Draft Local Plan appendices July 2019 Web opt Part2a.pdf'. The quote on page for the Designations/Proposals to change from the 2012 Core Strategy policies map on page marked 216 is:

`Specific proposals to reinstate railway line at Hall Farm Curve and re-open of Lea Bridge Station`

and the comment is:- `Included in `Rail Stations` as Lea Bridge Station is now operational`.

Then in the `Changes` section of the final 2020 submission version of LP1, the page referring to Lea Bridge Station is now renumbered to be page 247, but there is no reference at all to:

`Specific proposals to reinstate railway line at Hall Farm Curve` no longer being a priority project. This down grading compared with `the 2012 Core Strategy policies map` is hidden.

A specific statement of support for the HFC was included in Highams Park Planning Group's submissions. Their support is included in the formally adopted `Highams Park Plan`, which had been overwhelmingly supported by Local Referendum. The request to reverse the Council's decisions not to include HFC in the list of Transport infrastructure Priority projects to support went unremarked. Regarding HPPG's support for the HFC, there was no answer by the Council to this in their 112 page schedule of comments file `Direction of Travel Consultation Report Schedule of Comments and the Councils Response1.pdf` and responses by the Council.

Our Meridian Line Working Group includes two senior Councillors, chair Terry Wheeler, and Cllr Tony Bell who is the Chair of the Council's Public Transport Consultative Group. They are working with us, active members of the community, several of whom are highly qualified and experienced Engineers and Planners.

My colleagues Graham Reeve and Mike Chrimes are fellow members of our Meridian Line Working Group and have submitted very detailed descriptions and arguments to support our Meridian Line proposal, and the changes needed to LP1 2020. They have made specific arguments as to why our proposals should enable the Council, in it's Local Plan, to prioritise the Meridian Line project and the Hall Farm Curve, which is at the heart of this scheme. They have described the scheme and the arguments for it, so please consider their statements alongside mine.

Mike, Graham and I were joint authors of our Meridian Line team's submission, to the Leader, Cabinet Councillors, and specifically to Cllr Simon Miller, WF Cabinet Member for Economic Growth and Housing Development. The current title of our 12 page report is: `Meridian Line briefing note MC update 30-11-20 accept changes v11p.docx`. This was the current version of our report after 18 month's of work, making the 2020 case for prioritising our HFC scheme at the point in time when we had to submit final comments on the WF Local Plan.

Though the two Councillors in our team fully supported our report, they did not write the report themselves. It was we, the community activists (all three of us Civil Engineers), who set out all our arguments, and recently gained support for the Meridian Line proposals at Cabinet and with Council leader(s). I would wish to attach this report to my submission here, and then you Inspectors would have read all our arguments, but WF LP Inspectors have specifically requested `No Appendices`. Sadly, I could have, but did not submit our Meridian Line report with my response to the Draft Plan in December 2020.

The Council issuing the `Infrastructure Delivery Plan` documents we found on the Council's website in April 2021 looked like an opportunity to understand why the Meridian Line Project (HFC) had not been selected as a priority infrastructure scheme.

For Rail schemes, there was a clear misunderstanding of the different degree of benefit to the Borough and meeting a key `Golden Tread` `Ensuring growth is sustainable and

supported by infrastructure'. The Meridian Line project is estimated to cost £45 million, which brings benefits to the residents, employers and employees of businesses right across the Borough. A quick look at the Growth Areas Map, Fig 3.23 in document KD12.3 shows the Meridian Line has 6 rail stations with their catchments, by walking or cycling, in the North, Centre and South of WF, all with Growth Area plans listed in the LP schedules. This can be compared with a single station benefiting one new development and estimated to cost between £60 and £80 million.

Officers working to identify changes for LP1 in 2020 only had to speak to the chair of the Public Transport Consultative Group, Cllr Tony Bell, or look at the publicly available minutes of that committee to know that substantial work was being undertaken on the proposals for HFC. They would see that what was now being suggested was the use of existing platforms 11 and 12, which were about to be lengthened, not a totally different £400 million scheme.

The sections which deal with the Hall Farm Curve in the 'Infrastructure Delivery Plan' documents include Clauses 3.133 and 3.134 on page 48 of 99 in the 'Physical Infrastructure WF IDP 2020' (KD12.3). The wording of these clauses fails to connect the proposed scheme with the way they meet the need for infrastructure to support new homes and businesses in the Growth Areas around the 6 stations on the route of the Meridian Line in the North, Centre and South of the Borough, together with the many other benefits of this scheme.

Suggestions for rewording of these two clauses 3.133 and 3.134 have been sent to the Council, and following our Meridian Line Group meeting with Cllr Simon Miller, we produced 2 documents: '12 key Meridian Line bullet points for Simon MC v3.doc' by Mike Chrimes, and my document 'Meridian Line Roger 16 points for Simon v3.doc' which we consider set out the current much more positive position between the Meridian Line Group and the most Senior Councillor responsible for the Local Plan. These two brief documents have already been lodged with the Inspectors as they were copied to the Inspectors when I emailed my request to speak at the Examination on 22nd December 2021.

We are pleased to report that Cllr Tony Bell has reported that the Council, in consultation between Network Rail and TfL representatives, intends to fund a 'Performance Modelling' study, costing between £10,000 and £20,000 to establish the viability of the proposal to reopen a 2 trains per hour shuttle service using existing platforms 11 and 12 at Stratford for the Meridian Line, by interleaving with planned Lea Valley line services, in the medium term, until such time as the planned redevelopment of Stratford station is constructed.

We note that there is a 'Duty to co-operate' with neighbouring boroughs over schemes which like the Meridian Line affect surrounding boroughs. The Chingford Line Users' Association have met with officers from LB Newham, LB Enfield, LB Haringey and LB Hackney in our efforts to ascertain their views and potential for support for constructive dialogue and co-operation over financial agreements over funding.

It was as a result of one such meeting with officers at LB Newham that we were made aware the Section 106 funding that LBN had, many years before, agreed £4 million to support the Hall Farm Curve, through Parliamentary agreement reported in Hansard. We learn that this funding, having never been taken up, was about to become unavailable. CLUA pressed WF council to use this funding before it was lost towards the cost of reopening Lea Bridge station. CLUA and Railfuture had funded an independent £5,000 study into the reopening the Hall Farm Curve and Lea Bridge Station, entitled 'Lea Valley Rail Better access to jobs and homes'. This tipped the balance and the Lea Bridge Station went ahead on that basis.

We are concerned that we are not aware appropriate consultations have take place in respect of the Meridian Line proposals and needed to be initiated through appropriate meetings and inter-borough working groups.

### **Recommendations Matter 7:**

The first 8 of these are taken, with thanks, directly from Mike Chrimes' Hearing Statement:

1. The Hall Farm Curve offers the potential to enable LBWF to realise many of its policies, either directly or as an enabler.
2. 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 Local Plan LP1 should include specific reference to the Hall Farm Curve whenever relevant to policies.
3. It is suggested paragraph 2.6b (Transport LP1 p6) is rewritten to explicitly commit to advancing the Hall Farm Curve through discussion with NR, TfL and other stakeholders.
4. Policy 3, Infrastructure for Growth should be rewritten at paragraph 3A to include the Hall Farm Curve as a priority scheme, with more appropriate reference to the Whipps Cross Hospital development in this section.
5. Figure 3.2 should be modified to include both the route of the Hall Farm Curve and Ruckholt Road Station.
6. Policy 64 should include reference to the Hall Farm Curve.
7. The Arup Strategic Transport Review notes the absence of a North – South internal transport link. It also notes on page 60 and elsewhere the absence of an evidence base in LP1 for the transport network.
8. Nothing is really 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.
9. The wording of clauses 3.133 and 3.134 on page 48 of 99 in the 'Physical Infrastructure WF IDP 2020' (KD12.3) should be rewritten, taking account of the suggestions in the 2 page paper drafted by me Roger Gillham file 'Meridian Line was HFC reword parts KD12.3 and KD12.1 IDP v2.doc' attached to email to Cllr Simon Miller 17th October 2021.
10. WF should comply with the 'Duty to co-operate' with neighbouring boroughs over schemes like the Meridian Line which have a major effect on surrounding boroughs. There should be detailed discussions with LB Newham, as they have previously indicated their financial support for the scheme, as well as several other neighbouring boroughs.

### **Matter 1 Duty to Cooperate, and Matter 2 Vision and Strategic Objectives**

My Colleague and friend Gordon Turpin submitted substantial objections to the LP1 planning process but was unable meet the deadline to request to speak at the Examination stage. He raises extremely important concerns about the whole way LP1 and LP2 consultations have been and continue to be conducted. He feels these questions have not been addressed so far by the Council's responses. I am a member of the Highams Park Planning Group, of which he is the chair, and I was a founding member of it's predecessor Group, the Highams Park Forum over 20years ago.

I wish to speak to his paper copied below at the Hearing.

**Gordon Turpin speaking for the Highams Park Planning Group writes:**

This additional response has been prompted by our review of the Submission Version of the Local Plan (SLP) which commenced after the LP2 Site Allocations Consultation. In particular, we should like to make the following points:

We note that a number of Site Opportunity Locations were included in your LP1 (Regulation 19) consultation but were not included in this LP2 Site Allocation Consultation, as they are not regarded as Key or Strategic Sites. We believe this is potentially misleading due to the impact development of these sites could have on the character of Highams Park and other areas across the Borough and these sites should not have been included in the Submission Version of the Local Plan consultation without proper consultation even as Site Opportunity Locations.

Due to the heavy reliance on Site Opportunity Locations in the SLP to meet the Council's housing targets, a more rigorous and thorough consultation as part of the LP2 Site Allocations Consultation should have been undertaken regarding these Site Opportunity Locations in Highams Park and across the Borough before their inclusion in Figure 4.1. in the SLP. Our reasons for the above statements and why we believe this lack of consultation affects the soundness of the SLP are articulated below. The SLP allocates a new housing target of 3,400 new homes in the north of the borough, of which 2,000 homes are targeted in 5 strategic locations and 1,400 homes are targeted outside of the strategic locations.

That part of Highams Park designated as a strategic location has been allocated a target of 400 new homes. Only 59% of new housing in the north of the borough is allocated to Strategic Locations. The distribution of the other 41% of the target of 1,340 new homes at Site Opportunity locations across the north of the borough is unquantified.

Based on the maps provided, it is apparent that Figure 4.1 contains thirteen potential Site Opportunity Locations in the HP Plan Area. Figure 4.1 is a small scale, low resolution graphic from which it was impossible to discern all the sites marked on the map in the HP Plan Area from the documents provided; nor was there a list of addresses of the Site Opportunity Locations.

We contacted Council planning officers who kindly provided us with maps of each site. We have listed these sites below [list not included here] and, for clarity, have split them between sites within the HP Strategic Location and those sites that fall within the HP Plan Area but outside of the HP Strategic Location.

It is difficult to sum up the Council's failings but in summary I would say the following:

The Proposed Local Plan has demonstrated a failure to cooperate as it has only paid lip service to consultation and taken little or no account of comments from local residents or the comments of the Highams Park Planning Group at workshops and through its online consultation portal. Highams Park has been designated as an area of transition, however it is clear from the feedback from the Council's consultation that residents do not support this and want the Council to honour its overriding principle to respect the character of the borough's historic town centres.

It is unsound inasmuch it is looking to provide much more housing than required by the overarching London Plan and to meet these inflated targets is proposing overdensification and buildings that are too tall on designated sites. In short has not respected the character of the town centre which is directly opposed to the overriding principles of the new local plan.

Thank you for this opportunity to set out our views on the changes we would like to see in the LP1 2020 plan for Waltham Forest Council, and it's accompanying documentation. I look forward to taking part in the Public Examination.

Yours sincerely

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for Meridian Line Working Group, Chingford Line Users' Association and WF Agenda 21 Transport and Pollution Focus Group, whose report and recommendations, including to the plan to reopen the Hall Farm Curve, were accepted by the Council in the year 2000.

