

Representation to Waltham Forest Local Plan Examination

Michael Chrimes on behalf of the Costa Coffee Group

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

I believe LPE30 reflects many improvements in the previous plan with regard to housing targets and the potential developments in Chingford. The recent consultations regarding the Chingford Mount Town Centre have been a positive engagement between the Council and local residents. The Council's commitment is reflected in their application to central government for levelling up funding, unfortunately unsuccessful in the current round.

MATTER 1: DUTY TO COOPERATE AND OTHER LEGAL REQUIREMENTS

Habitats Regulations Assessment - Air Quality

With reference in particular to paragraph 1.3, but more generally, it is difficult to see how traffic reduction can be assumed with any certainty. Despite national commitments to encourage a switch from petrol/diesel to electric cars, progress is slow and for example nationally battery manufacturing capacity remains limited, while locally residents have criticised the location of charging points in their streets making provision for transition slow.

In the shorter term the proposed extension of ULEZ in 2023 excludes a small area along the northern margin of the Borough/Epping Forest is excluded. This may cause drivers of non-compliant vehicles to drive along the A1069 and Bury Road, increasing traffic volumes there, and also perhaps parking around the streets to the north west of Station Road to make use of the railway station. The area concerned can be seen at a small scale on this map

<https://lruc.content.tfl.gov.uk/ulez-londonwide-expansion-2023-long-dwell-map-v20.pdf>

Elsewhere the redevelopment of Whipps Cross Hospital in the period of the plan is likely to generate construction traffic on the margin of the Forest in Leytonstone and Walthamstow.

Progress with the active transport plan in the north of the Borough in particular is slow, with little in the way of cycle routes at present, and safe routes from some parts of the area, eg the Chingford Hall Estate, to transport hubs is poor. Despite the manifesto commitment to this by the local council it is difficult to see how quickly a modal shift can be achieved on the scale apparently seen in the south of the Borough. In that regard some of the linear routes in the SANGS noted below could help.

One scheme that might assist in a modal shift is the proposed Meridian Line linking Chingford and Walthamstow to Stratford, which might reduce road traffic along the Epping Road etc, but that proposal is still being assessed by consultants and is not currently prioritised in the TfL plan. Accessibility issues at overground stations across the Borough also oblige many people to use their cars or road transport.

Habitats Regulations Assessment – Suitable Alternative Natural Greenspace

With regard to the SANG locations as outlined in LPE33, there is a potential imbalance between the scale of the proposed development in the north of the Borough and the potential gains by the proposed schemes (Proposed sites 1-15). One wonders how easy it would be to raise proportionate funding from the Community Infrastructure Levy for those schemes.

With regard to the scheme in the north of the Borough, and more generally, while the Lea Valley and Epping Forest, and to an extent The Highams Park, offer the prospect of a long walk, most of the other sites are more akin to dog exercise routes and it is difficult to see how many would

actually attract visitors away from Epping Forest, although all would make a contribution to active living, and would merit investment on that score.

Comments on the individual sites:

1. Lea Valley link-this would potentially have a great attraction opening out green spaces which are largely inaccessible, however because of the hills involved to the north it is likely many potential visitors from North Chingford would choose to access by car. Pedestrian access in the north would have to be improved.

2. Sewardstone Paddocks- Largely inaccessible this would mark a great enhancement but require improved pedestrian access across/along a very busy road. While there is growing housing development in the area, for those to the east of Sewardstone road there is safe pedestrian access to Epping Forest, so potential use may be reduced.

3. Chingford Rugby Club- This would seem largely to be an important contributor to likely use of the Lea Valley Link. It is divided from most housing by a very busy road and at the bottom of a steep hillside, so walking from parts of 'Chingford Mount/North Chingford' may not be attractive.

4. Mansfield Park-this is under-utilised compared to Ridgeway Park, as it has no visitor attractions. Part of the 'park' is densely overgrown and could provide a habitat for a variety of flora and fauna which could attract more visitors if publicised, but also be worthy of protection of itself.

Consideration could be given to a small Childrens playground at the bottom of the park, which could also attract more visitors from new housing at the bottom of Mansfield Hill/Sewardstone Rd..

5. Ridgeway Park-This park is relatively well used for its playground and sports activities. It is unclear whether visitors would be attracted by wilding, and visitors might prefer more active sports and recreational facilities. Suggest should be dropped as a SANG.

The idea people would walk from Sewardstone Road in 15 minutes is difficult to believe as it involves ascending a steep hill, and should be dropped from the relevant table.

6. Policeman's alley-with enhancement this could be an important traffic free route for pedestrians, joggers, and cyclists and the numbers are probably an underestimate. Moreover it might encourage use of other green spaces, including parts of Epping Forest.

7. Chingford Green-this primarily serves shoppers and one cannot expect visitors to the Forest to be tempted away, although the local churches and conservation provide an attractive setting. Walking from Sewardstone Road seems a big ask up Kings Head Hill, and access from the south of the Green is poor.

8. Pimp Hall Park. As with Mansfield Park this is considerably under-utilised, and probably only known to local residents. Larger visitor numbers could be achieved by promotion, and also more varied sports offering.

9. Chingford Mount Cemetery-the costs of this scheme seem disproportionate as the paths already exist. The cost of flood alleviation and balancing ponds must be the explanation and surely this work may be justifiable anyway, and attract its own funding? The Eastern extension of the cemetery is not included in the scheme although it is possibly the most biodiverse at present. Improved access might attract bird watchers. The potential for encouraging active transport ie cycling and walking to gain access to the shops at Chingford Mount is not mentioned.

10. Larkswood. As suggested access to parts of the site are currently difficult and well worth improving. Use of the recreation area seems to have been deterred by the loss of sporting facilities, and restoring this would make a big difference to visitor numbers.

11. The Highams Park This area is popular with walkers, and while signage to the recreational facilities in the 'parkland' alongside would be beneficial, one cannot believe new residents and visitors would not want to walk in the Forest. Most people would probably do both.

12. River Ching Walk- great enhancement with potential to attract cyclists as well.

13. Ainslie Wood/Rolls Park-an obvious enhancement, which would benefit by links to the Ching, Lea Valley, and Postmans Alley routes to create joined up open spaces.

14. Chase Lane Park-Childrens Recreational facilities and sports exercise spaces would seem the most likely attractions for this area.

15. Banbury Reservoir- this would be an attractive addition to the Wetlands offering and likely to attract many visitors, including some for whom the Wetlands are difficult to access by foot at present

In summary I am not convinced that all the projects in the north of the Borough will attract CIL funding, some of the suggested 15 minute walk groups are unrealistic, the nature of the proposed SANGS are unlikely to draw people away from the Forest, although they may well generate more visits, and these visits would also be encouraged by sporting or children's recreational facilities. The linear routes would greatly enhance green routes available in the area.

MATTER 2: The Scale of Housing Growth, Matter 3 Housing Land supply etc, Matter 6 Tall Buildings

In this matter I am in agreement with many of the points made by Mr Matson and Mr Gilham (original submission Reference 1222600).

It is difficult to see from the evidence so far provided that the LBWF target of 27000 dwellings is reasonable or justified by the evidence. The London plan figure of 1264 homes per annum til 2030 bears close alignment with the actual figure for 2020/2021, and one could argue that more can be built, but this difference is large, ie c. 1300-1800 pa. It does not bear much relationship to the numbers contained in The Growth Capacity Study (2018) LPE44.1 where figures are much closer to the GLA assumptions i.e. 1084-1452pa. The timescale has now been readjusted to 2023-2038, and one wonders how many of the low hanging fruit in terms of easy development have already been started.

Some of the development assumes tall buildings. It is clear that central government policy thinking on intensification has changed since the draft policies and plans were drawn up.

Government consultation on the "Levelling Up and Regeneration Bill: Reforms to national planning policy", states (Chapter 4, Planning for Housing, section 9):

"we intend to make clear that if housing need can be met only by building at densities which would be significantly out-of-character with the existing area (taking into account the principles in local design guides or codes), this may be an adverse impact which could outweigh the benefits of meeting need in full." Without national political will it is difficult to see how major intensification schemes beyond the GLA targets can be achieved in a timely manner through the planning process.

The GLA and LBWF proposals were drawn up without the benefit of the latest (2021) census figures.

Britain's overall population grew by 6.3% in 10 years 2011-2021, and that in London by 7.7%, WF grew by 7.8%, therefore around the average for London, from 258,200 to 278,400. Unless one is providing for single resident dwellings, a figure of 1200 dwellings for future growth seems more aligned with the recent census. Other trends are likely to affect the nature of any rising demand. The population over 65 in Waltham Forest has grown by 11.1% , and perhaps crucially there has been a 15% reduction in people aged 25-29, and 24% fall in those aged 20-24, while the population aged between 0-15 only grew by 1.8%. These trends may of course reflect shortages in the existing supply, and its costs, but the appearance of many of the flats built in the centre and south of the borough would appear to be flats to cater for younger people, the group that seem to be leaving. The low growth in numbers of children will obviously have implications for schools, but may also reflect shortages of family homes.

The rise in the elderly suggest growing demand for care homes and sheltered accommodation, but it is not clear that trend is picked up in the overall plan. Existing facilities at Pear Tree House are the subject of a current planning application which might result in a fall in existing provision. Additional provision might free up family homes occupied by the elderly in the area.

Matter 4

With reference to the re-categorisation of Cork Tree Retail Park from LSIL to SIL, this seems difficult to justify. The main retail block was refurbished in 2020, and the addition of an ALDI store in 2022 seems likely embed its current usage for some time. Access to the North Circular r is difficult given current traffic volumes along Hall Lane/ and the North Circular Road itself. Pedestrian

and cycle access could be improved from nearby residential areas, and without this further development would seem to work against the 15 minute city approach.

Mike Chrimes January 2022