

## **Waltham Forest Local Plan Part 1**

### **Examination in Public Stage 2 Consultation**

Statement by S Ritten

Reference number: **1253924.**

Matter1 reference 1.7, 1.8 and 1.9

- My representation about the SANG proposals is predominately on an area of the borough which covers 4 adjacent wards: Leytonstone, Cann Hall, Grove Green and Cathall that have existing greenspace deficiency. These range between 0.08 and 0.41 hectares of unrestricted open space per 1000 people and this has been masked by the practice of averaging across the borough where the North of the borough has significantly more open space and the apparent space provided by the Epping Forest SAC. The council audit of unrestricted green space ratio to people was performed in 2008. This deficiency is also identified in the Waltham Forest Borough Blue and Green Strategy November 2020.

These 4 wards have mainly terraced housing with their own gardens or small blocks of flats with surrounding garden space. This housing type has helped to mitigate overuse of the neighbouring SAC. However, the Epping Forest SAC and Bushwood and Wanstead flats have been the main open green space available to residents of these 4 wards apart from some children's playgrounds and one park in the Cathall ward. The Local plan proposes a densification and on the basis of the proposals will see a total 2855 homes which will be built on sites in all 4 wards but the major densification will be in Leytonstone Ward. The majority of these will be in the form of flats in tower blocks. A meaningful SANG strategy is therefore essential.

#### **My observation:**

1. The council submission uses a map that only includes SAC and SPA designated land that fall within the borough boundaries. The Borough is bordered on the west side by Metropolitan open land and to the North and East by the Epping Forest sac. This incomplete mapping means some proposed SANGS are not providing the intended benefit in directing increased population pressure away from designated protected sites. An example of this is the Roding link SANG proposal (item 26 of LP33)
2. Whipps Cross site details that there will be mitigation on site for the proposed 1500 homes. The outline planning permission states that 5.4891 hectares will be available for parkland, private gardens and semiprivate gardens. It is not clear whether the private and semiprivate gardens will be for the hospital or the residents and in what proportion. This will be serving the 1500 homes plus hospital staff, patients and visitors. It seems likely that this will not mitigate use of the SAC fully. An area of this size would normally be regarded as suitable mitigation for 286 dwellings without the hospital development. It is not included in the list of proposed SANG sites.
3. The Roding link (item 26 of LP33) proposes people being directed from the developments in Leytonstone and Forest ward to Wanstead flats and thence to the Roding River.

The corridor proposed alongside the A12 is an additional pathway into the existing underpass. It is unlikely to divert people from the Whips Cross development in the Forest ward, as the closest and easiest option is crossing the Whips Cross road to the Hollow Ponds and Leyton Flats area of the SAC. It won't serve any purpose to the developments at Tesco, Matalan or the Leytonstone car park as there is an existing pathway to the underpass at upper end of Leytonstone High Road which is much closer and more direct.

The Green Man underpass area had wild seeding 1999 and the flora has evolved and includes some interesting natural colonizers like Bee orchids.

<https://www.wansteadwildlife.org.uk/index.php/en/other-locations66/green-man-underpass>

The Green Man underpass area should be properly surveyed before any remodelling is implemented. There are already 4 pedestrian and cycle access routes leading to the underpass.

The proposal describes people being directed to the Roding River but the route is not clear.

The proposed route seems to lead through Bushwood (a small wood which is part of Epping Forest with at least 4 veteran trees and where Staghorn beetle has been found) onto Wanstead flats which includes a SSSI and acid grassland where a Skylark and meadow pipit breeding population are already under pressure. However, the mapping route from the underpass is confusing and seems to indicate directing people to Wanstead Park rather than Wanstead Flats, although Wanstead flats is specified. Since the Bushwood flats and the wood itself are part of Epping Forest they would have a designation of sites of importance for nature conservation (SINC.) Any plans to increase the footfall of visitors through the woodland and woodland pasture would lead to additional damaging pressure.

To reach the Wanstead Park area, which I think is the intention of this proposed route will either necessitate a 10-to-15-minute brisk walk along Bush Road and Blake Hall Road. Both are busy suburban roads or a longer route through Bushwood and thence through the SSSI and also involves crossing several busy suburban roads to reach the Roding

4. The proposal to use St Patrick's cemetery (item 30 of LP33) which lies in the Cathall ward has some significant errors.

The site belongs to The Catholic church, not the council as stated, and is administered by a Catholic charity who were unaware of this proposal (personal communication). It also is an active burial site and is only one of 2 Catholic cemeteries in London. There are some historical graves within this site. Given that it is still actively used for burials this is likely to be of limited use as a general-purpose green space for recreation. It is more than a 15-minute walk from Leytonstone town centre.

5. St John the Baptist (Grade2 listed) whose Churchyard (item 27 of LP33) is also proposed as a SANG lies immediately near 3 sites earmarked for significant densification in the Leytonstone ward. The church already operates a community approach and hosts various events in the forecourt. The very small site of the graveyard is being managed already for biodiversity and because of the limited space likely to suffer if exposed to significant increase in footfall.

6. Langthorne Park (item 31 in LP33) was created in 2000 and is 1.89 hectares in area and a 25-minute walk from Leytonstone tube (website information). The proposals for it as a SANG is for enhancements and no expansion of the area. It may provide some mitigation for new residents in the developments in the Cathall and Cann Hall wards but not for the developments in the Forest, Grove Green and Leytonstone wards.
7. Leyton cricket ground (item 28 of LP33) is more than a 15-minute walk from Leytonstone Town centre.
8. Sidmouth Park and Coronation Gardens SANG (item 29 of LP33) again is more than a 15minute walk from Leytonstone town centre.

### **My response to HM Planning Inspectors MIQs**

#### Matter 1

1.7 The timing claimed to access various designated SANG sites is overly optimistic especially for older people or people with small children. e.g. The time it takes to walk to Langthorne Park from Leytonstone Town centre is given as 15minutes but advice on the website is 25 minutes. St Patricks cemetery is further in distance and is still estimated as within 15 minutes.

In this respect the methodology to determine accessibility is faulty

The SANG proposed on the Whipps cross site is still not fully defined in area or location and the pressure of Hospital staff, visitors and patient use has not been factored into the space set aside in the outline planning. It is not apparent what methodology is being used here.

1.8 Based on my observation in points 1-8 above, NO, I don't think capacity, quality and deliverability are possible for communities in these 4 wards. I don't feel equipped to comment on the financial aspects of the SANG provision.

1.9 Based on my observation in 1-8 above, I believe the SANG strategy is NOT developed sufficiently to support the conclusion that there will be no adverse effect on the integrity of the Epping Forest SAC

### **My suggestion to address the issue of ineffective Sang provision.**

- Where developments sites are being identified the overall housing provision should at most be in line with the London plan. The housing type should be reconsidered with a requirement for private outdoor spaces
- The development sites should have an absolute requirement for open green space to be incorporated on the site rather than the use of flexible terminology such as 'consideration to urban greening etc'.

- There should be especial consideration of sites which fall within wards that have a dearth of open green space as identified already in the council audit. At the very least the current residents to open space ratio be retained.
- In summary, whilst the SANG policy is there to provide further protection to important areas of conservation by providing suitable alternatives and reducing recreational pressure (and in theory is positive), there are concerns with the proposals which mean they may not be adequate or achieve their intended goal without further assessment and analysis.

S Ritten

22/1/2023