
From: Abigail Woodman [REDACTED]
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Follow Up Flag: Follow up
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To whom it may concern

1a. Much of the detail of how the new local plan will impact the borough is contained in LP2 and my understanding was that inspectors would scrutinise LP2. However, this does not appear to have happened, and LP2 does not appear to have been updated alongside LP1. To my mind, it is difficult for local people to interpret what Waltham Forest intends without an updated LP2 and, as such, the modifications to LP1 are unsound: the detail is missing.

1b. For example, a new golden thread has been added (MM2: 'conserving, enhancing and celebrating the locally distinctive character and heritage of the borough'). Yet, as a local people, we know Waltham Forest Council is positively encouraging developers to build very tall tower blocks (as detailed in LP2), despite the fact that these will damage the locally distinctive character and heritage of the borough. This inconsistency demonstrates the unsoundness of the revised plan.

1c. Furthermore, the fact that inspectors have not scrutinised LP2 disrespects the efforts local people made to review and respond to the consultation. The soundness of the process must, as a result, be brought into question.

2a. The inspectors were clear that the number of new homes proposed for Waltham Forest was overdevelopment and undeliverable, yet the number of homes planned (27,000) has not changed. What is being proposed is overdevelopment, undeliverable and not what is required. Consequently, the revised local plan continues to be unsound.

2b. The only way to squeeze the required number of homes into the borough is to build tall tower blocks. As noted at 1b, this is inconsistent with the desire to conserve, enhance and celebrate the locally distinctive character and heritage of the borough. It is also inconsistent with another golden thread ('protecting and enhancing the natural environment'). Many of the new towers are located to the west of the borough, abutting statutorily protected green spaces. The impact of light pollution from these tower blocks will have significant negative impacts on habitats, species and biodiversity more generally. Again, this inconsistency means the revised plan is unsound.

2c. The number of new homes is not deliverable. In the years 2020/21, 2021/22 and 2022/23 Waltham Forest Council has failed to meet the housing requirements. Furthermore, many of the developments described as coming forward shortly in 'LPE 32a_ Further update to 5YHLS 2023' are already behind schedule. To take just a couple of examples, despite us being at the end of Summer 2023, work has yet to start at Priory Court; and work at Barclays Bank on Hoe Street has not started either, despite it being scheduled for 'mid-2023'. It is known that unrealistic targets drive poor decision making, and to establish unrealistic targets through a local plan will disincentivise Waltham Forest Council from making good decisions when talking to developers. It will make livable neighbourhoods that much further out of reach. For this reason, the revised local plan is deeply unsound.

2d. There is no doubt a need for homes that local people can afford to buy and rent, but this plan will not deliver such homes. The phrase 'genuinely affordable' is used a number of times (not least MM3 and MM5) and is discussed in detail in MM30, but the definition of 'genuinely affordable' is far, far too broad. Affordable homes are not affordable, and shared ownership is a racket. There must be a commitment to social housing; that is the only genuinely affordable option. It is also the only sound use for public land. Without it, Waltham Forest Council is continuing to pretend it can deliver homes for local people while, in reality, it is social cleansing by transferring many of our most vulnerable residents on the social housing waiting list out of the borough.

3a. The importance of protecting Metropolitan Open Land within the borough is of paramount importance. However, there are noticeable inconsistencies in the statements made in the new local plan and the proposed developments Waltham Forest Council is encouraging. Either the plan, or the encouragement, is unsound; and if the plan is used to justify the developments it must, therefore, be the plan.

3b. For example, MM151 says that 'All development proposals should enhance the value of existing open spaces by i) responding to the character and significance of the space; ii) optimising physical and visual access between development and open space; and iii) increasing biodiversity value. Yet many of the developments detailed in LP2 do not do this. Waltham Forest Council is positively encouraging tall tower blocks all along the borough's western boundary, along the marshes. These towers do not respond to the character of the marshes, they do not optimise visual access to the marshes (unless, of course, you buy a flat high up in the air), and they do not increase biodiversity value as the increase in light pollution and footfall will only increase the pressure on nature. A plan that permits behaviour it purports to eradicate is, by its very nature, unsound.

3c. I'm sure the council will respond to the point above by directing me to MM164, which states that 'Planning applications for development at Blackhorse Lane will need to be accompanied by a project level HRA to ensure the development will not generate adverse urban effects on the integrity of the Lee Valley SPA and/Ramsar'. But I would argue this is an implicit acknowledgement that the proposed town blocks will cause harm, and it is kicking the can down the road. The plan has so many statements, so many words, that developers - and those that want to support the developments - will find ways to argue it supports their proposals. And local people will have to hear councillors on the planning committee say, yet again, that they don't like the development but will have to wave it through because it meets the requirements of the local plan. A local plan that really wants to protect open green and blue spaces, and preserve the natural environment and support biodiversity, would say much more about what it doesn't want to see. It would not give developers a way to circumvent environmental protections. As such, it is unsound.

4. The changes to the local plan that try to mitigate the impact of the proposed developments on Epping Forest SAC are laughable. The SANGs strategy is weak, as most of the alternative sites are not a suitable replacement for Epping Forest and people will continue to flock to Epping Forest. In addition, the idea that monitoring visitor numbers will negate harm is ludicrous: once the damage has been done, it has been done. And what does Waltham Forest Council propose to do if harm is identified? It proposes reviewing the local plan (MM184, MM185 and MM186), which is surely an example of bolting the stable door after the horse has bolted and hardly a quick process; while the plan is under review, more harm will be done. Furthermore, reviewing the plan will only (if at all) impact what happens from that point forward; essentially the baseline will shift. It will not reverse damage done. We are in a climate crisis and we must act to support nature; to fail to do so - as demonstrated by this local plan - is unsound.

It has taken me a long time to review all the documents relating to the modifications to the local plan, and I am distressed I haven't been able to spend longer or do more research to phrase my responses in ways that will make someone listen to my concerns. I fear what I have said will be dismissed, but I live in hope that the process is sound, and that the inspectors have the willingness and the power to curb the worst excesses. In Waltham Forest we need to actively treasure our green and blue spaces, we need to focus on supporting nature, and we need to build social housing. At the moment, the local plan fails to secure these basic requirements. As such, it is not fit for purpose.

Abigail Woodman

