

## Response to Waltham Forest Local Plan 1 reconsultation

I understand the inspectors may not read submissions from those who did not participate in the first round of consultation on the First part of the Local Plan. I made several responses to Part 2 and hope the inspectors will take a little time to read the points below.

The Council has paid professional staff and other consultants well versed in planning language who will have worked on these documents over many months. For ordinary residents there are a very large number of documents and pages to look through in our spare time. I had little time to do anything before the New Year and also suffer from poor health so I have written out what I think are the key issues affecting development and open space in the south of the Borough and the Lea Valley. I regret this may not meet the requirements set out by the inspectors.

I am a member of a local campaign to protect local green spaces in the Lea Valley, Save Lea Marshes.

I will attempt to frame my answers in response to some of the questions asked by the Inspectors

### **2.4 Overall, is the scale and distribution of housing and employment growth justified, including with regards to general conformity with the London Plan's housing target for the Borough, flood risk, the effect on Habitats Sites, and the effect on air quality? Are any main modifications necessary for soundness?**

1. As the inspectors have already pointed out, Waltham Forest is building well in excess of what is required under the London Plan.
2. Not only is Waltham Forest building more than is required it has made it plain that its reasons for doing this are, at least in part, to raise council tax rather than to meet housing need.
3. Even for projects for which it has given permission, such as at Lea Bridge Station, Waltham Forest is not building homes for those most in need. For the project at Lea Bridge Station the Planning Statement itself stated it was not compliant in terms of social housing, the project will not produce any genuinely affordable housing.
4. Waltham Forest is concentrating its development in the most crowded and deprived southern part of the Borough, thus adding to the pressures and risks to health which already exist in this part of the Borough. The council has recently commissioned a report into the health of its residents. Despite this and far from taking the necessary action to reduce those harms further development in this part of the Borough will only add to these risks to its residents' health.
5. The south of the Borough has the poorest provision of local parks. Green spaces are now well known to be essential to improving the physical and mental health of people. Poor people, who already live in the most crowded and deprived areas, are in particular need of

such spaces, yet Waltham Forest is cramming more people into these areas which are already under-provided for in terms of green space.

6. In the case of Lea Bridge Station the project will demolish a pocket park thus further reducing the green spaces available to local residents. Biodiversity net gain has been used to justify this destruction. The replacement trees on site will not provide the benefits of an existing small wood which acts as a counter to city heating and air pollution and improves the health and social well being of local residents. Biodiversity net gain could have been used to justify the keeping of trees which would continue to mature on site and provide a long term canopy. Instead it was used to destroy an existing, thriving green space. Waltham Forest boasts of the parklets it is creating. However, none of these can match a small wood of this quality.

7. The most important green spaces serving this part of the Borough are on the edge of the built up areas, at Wanstead Flats and the Lea Valley. Ironically two of the largest of these green open spaces are not actually in the Borough, at Hackney Marshes, in the Borough of Hackney, and Wanstead Flats, in the Borough of Redbridge. Waltham Forest gains important benefits from the green spaces of other Boroughs in an area where it fails to provide adequate green space.

8. There are very few green spaces inside the built up areas of the south of the Borough. In other parts of the Borough there is far greater provision of such spaces. These other parts of the Borough are also less crowded and less deprived. Waltham Forest is therefore discriminating against its poorer residents who have the least green space although they need it the most while the parts of the Borough which are better off have more green space even though they need it less.

9. This imbalance applies in particular when comparing the treatment of the Lea Valley with Epping Forest. Epping Forest is treated with greater respect and greater protection so that those living near this wonderful resource can expect greater care from the Council when it comes to possible inappropriate development. Yet this care is less needed than for the green space in the Lea Valley.

10. Even the green spaces in the Lea Valley which do receive some care, such as Walthamstow Marsh, are degraded. Other parts of the Lea Valley Park, such as Leyton Marsh, Eton Manor and the Waterworks, are treated as spaces to make money. At Leyton Marsh Waltham Forest gave permission for a greatly expanded Ice Centre to be built. The Lee Valley Regional Park Authority (LVRPA), which has written in support of Waltham Forest, wants to build more sports facilities at Eton Manor and, of all things, a hotel there on Metropolitan Open Land. If it was going to agree to a larger Ice Centre, Eton Manor would have been a much more sensible location as it has excellent public transport connections at the busiest station in the UK at Stratford. Waltham Forest paid no attention to comments made by local people pointing this out. At the Waterworks the LVRPA has long wanted to build housing of some kind there and has run down its education and community centre so it is virtually unused. It has used the meadow to make money out of commercial camp sites and events and now wants to put on even larger music festivals on that space. Waltham Forest did refuse permission for one such music festival but gave permission at one of its own local green spaces at Low Hall for Secret Cinema to take over most of the space for a summer during the pandemic.

11. The Lee Valley needs to be treated with the same respect as Epping Forest.

***12. Indeed, given the lack of green spaces and the deprivation and over-crowding already being experienced in this part of the Borough there is an argument for saying the Lee Valley should receive greater protection than Epping Forest.***

13. The Lee Valley's past as a marginal industrial area counts against it in comparison with the historic hunting grounds of Epping Forest with its royal connections and designation as a forest. All this obscures the vital importance of the Lee Valley, situated as it is running through some of the most crowded and deprived parts of London, even the UK.

14. Instead of showing it respect Waltham Forest treats it as an asset to be exploited.

**Tall buildings should not be built near important open spaces.**

15. Waltham Forest is building a line of towers all along the east side of the Lea Valley. These will harm the visual amenity of the Marshes, seriously reducing the sense of openness of these spaces. The Lea Bridge Station development includes a tower of 26 storeys. Once permission has been granted for such a tower it becomes a precedent for ever higher towers.

16. Not only does Waltham Forest justify these towers with ridiculous descriptions that they are 'landmark', 'gateway' or 'way-finding' buildings, it even claims they improve the green spaces and add to the amenity of the space. *This is completely contrary to planning guidance and is plainly incorrect.*

17. In fact, in addition to stating that the project would not provide genuinely affordable housing, the planning statement for the Lea Bridge Station application stated that the site was not indicated for tall buildings. It is ridiculous that such a planning application should have been approved. It is impossible to have any confidence in Waltham Forest as a planning authority.

18. These developments will also greatly add to the population pressures on the Marshes.

19. The Lee Valley Regional Park Authority (LVRPA), which has written in support of Waltham Forest Council and which depends on it for planning permissions for projects like the Ice Centre, noted in an internal report presented to its Board the harm the Lea Bridge Station project would do to the Marshes in terms of its sense of openness and the increased population pressure, but it failed to object. The LVRPA has now decided it will not object to future applications including tall buildings because of the precedents already set. However, it didn't object to the station project so it has only itself to blame for failing to try to prevent that and other precedents being set. The absurdity of this sequence of decisions would be comical if it was not so serious and such a betrayal of the purpose of the LVRPA to protect this vital Green Lung.

20. Plainly we cannot expect these authorities to act to protect the Marshes and the Lea Valley Park. ***Who can local people turn to to hold back authorities which fail to protect these vital open spaces?***

21. The most egregious of these planned developments is the proposal to build a small town of up to 3,000 homes on the New Spitalfields site which is situated on the banks of the Old River Lea and right next to Hackney Marshes.

22. Waltham Forest will gain all the benefits from this site while Hackney will bear all the costs.

23. The population pressure on the Marshes and the Old River Lea will be immense. The plans include a bridge across the Old River Lea to the Site of Importance for Nature Conservation (SINC), which is already badly damaged by swimmers treating it as a party venue. The site is also expected to include pubs and cafes by the river which will attract more party goers to the river. If the damage already done by a relatively small number of swimmers and party goers at the SINC is anything to go by the SINC will simply sink and the whole area will be reduced to a shell of what it should be. Despite efforts, principally by Hackney Council, but not by Waltham Forest, to persuade people it is dangerous to swim in the highly polluted Old River Lea swimmers persist showing how little respect anyone trying to protect this space can expect to be shown.

24. The New Spitalfields development is expected to include towers of up to 30 storeys, justified by the existence of taller towers in the Olympic Park. Once again, the presence of towers of such height and so close to the open spaces will severely affect the sense of openness of the Marshes.

25. Waltham Forest has gone to the trouble of gaining support from other 'stakeholders' like the LVRPA.

26. If, as the LVRPA has already stated, the much smaller Lea Bridge station development will severely damage the Marshes how much greater will the damage be at New Spitalfields?

27. Our green open spaces are vital resources in fighting climate change, city heat, air pollution and in supporting people's physical and mental health and this needs to be at the heart of the Local Plan.

28. As economic benefits are generally taken to outweigh other benefits it has to be noted all of the above benefits are also economic benefits. Settling for Section 106 money under such circumstances, as the LVRPA has at Lea Bridge station, is a serious distortion of the planning process and betrays the purpose of the planning system to benefit local populations, most particularly deprived populations.

29. In the developments along the Lea Valley Waltham Forest boasts of the views over the Marshes and the access to green open space that they will provide. This exploitative approach to green open space, which will provide profits for developers and council tax revenue for the council, is entirely in keeping with the lack of respect shown for this vital green resource.

30. The implications for sewage overflows and other run off, already a severe problem for the River Lea, from such a mammoth project in such a vulnerable location simply doesn't bear thinking about. The development of the Olympic Park led to the linking up of a previously uncontaminated channel, Hennikers Ditch, to a combined sewer overflow (CSO) which now pollutes the Long Pond and the River Lea in the Olympic Park. An enormous development like this will add further pressure to an overloaded system.

31. We live in a climate emergency. Councils like Waltham Forest are drawing up climate change plans. Green spaces are vital for combatting climate change. Waltham Forest's plans for New Spitalfields and other developments in the south of the Borough contradict just about everything they claim to be trying to achieve for the health of their residents and combatting climate change. Building on the Marshes or next to the Marshes damages these green open spaces.

31. It is increasingly recognised that nature itself plays an important part in combatting climate change.

32. These developments will increase air pollution, increase carbon emissions with the construction of enormous concrete towers and harm the ground, nature and wildlife with massive new populations, all of which will reduce the capacity of these green spaces to combat climate change, carbon emissions, air pollution and city heat, particularly in this already overcrowded and deprived part of the Borough.

**In every respect this Plan is unsound. The scale of these developments in an already crowded and deprived part of Waltham Forest and the likely increase in air pollution will put more pressure on the health of existing communities. The area already lacks local green open spaces and the already permitted development at Lea Bridge Station will demolish an existing viable and important green space at Orient Way Pocket Park. Greatly increased population pressure and intrusive tall buildings will cause severe damage to vital wild spaces and habitat in the Lea Valley and the Marshes and to the sense of openness of these green open spaces. This Plan is unsound.**

**On Flooding, MATTER 5: THE ENVIRONMENT, CLIMATE CHANGE, FLOOD RISK, POLLUTION AND WASTE MANAGEMENT, I would simply say it is not sensible to build on flood plain in a climate emergency.**

**5.4 While the Council's position throughout has been that this Plan does not include site allocations, the Strategic Locations and the focused Site Opportunity Locations provide a clear steer on the location and amount of development expected within their boundaries. On this basis is it justified, and would it be effective at the strategic level, to defer flood risk considerations, including the Exception Test where necessary, to future consideration of site allocations and/or planning applications and site-level Flood Risk Assessments?**

33. We are constantly told not to build on floodplain, yet Waltham Forest simply declares it has to build on this land. Once again, this ignores the realities of climate change and the harm this does to these green spaces. It is impossible to take Waltham Forest's climate change plans seriously.

34. To suggest that site allocations are somehow irrelevant to this consideration is seriously disturbing. *If that is the case then all the discussion and comments submitted by concerned members of the public will be irrelevant. What is the point of this consultation if discussion about site allocations is passed over?*

35. New Spitalfields, in particular, which is a critical site allocation, is in a very vulnerable situation on the banks of the Old River Lea. It lies slightly lower than other land in the area

and is vulnerable to flooding from the railway line. It is crossed by the Dagenham Brook which is at present culverted but in the plans will be opened up. Even if it remains culverted there is a risk the Brook will simply overflow as the culvert will be inadequate. It is also on a bend in the river. Raised land along the Old River Lea means the river is likely to turn into a torrent in a flash flood which will lead to a particular impact on a bend in the river. The flood relief channel is no longer fit for purpose and will fail in an extreme event. Applying exceptions in a time of climate emergency is, to say the least, extremely risky. A site like New Spitalfields will be there for decades to come as the climate emergence worsens, as it most certainly will before it get better, if it ever does.

36. The climate emergency will mean extreme weather of different kinds. We have already seen extraordinary heat last summer. Not just record temperatures but temperatures which were believed to be impossible on an island protected and cooled by sea on all sides. As was reported in the Guardian during the extreme heat wave [https://www.theguardian.com/environment/2023/jan/18/outlook-terrifying-tv-weather-presenters-on-the-hell-and-horror-of-the-climate-crisis?CMP=Share\\_iOSApp\\_Other](https://www.theguardian.com/environment/2023/jan/18/outlook-terrifying-tv-weather-presenters-on-the-hell-and-horror-of-the-climate-crisis?CMP=Share_iOSApp_Other), meteorologists could not believe what was happening, *“We were looking at it, going: no, this isn’t realistic, it’s not going to happen,” says Rich. Then, in the office, he watched as the temperature continued to rise.’*

37. Just as with excessive heat we have to expect storms and flash flooding on a scale we cannot at present comprehend. Pakistan, Australia, California are just some examples of the kind of flooding to come. If we say but these are not England then remember that last summer’s heat was not England either.

38. New Spitalfields is on the Old River Lea, it is crossed by the Dagenham Brook, it is in the heart of the river valley and the existing flood relief channel has nearly overflowed on three occasions and is no longer an adequate defence.

39. It is well known land is needed to soak up flood water, particularly in river valleys. Yet, instead of taking this reality seriously and planning to increase the land available to absorb flood water, Waltham Forest plans to build a small town in the middle of a river valley – in part to raise extra council tax revenue – during a climate emergency. To say the least this is foolhardy, at worst it could be criminally negligent.

**In response, I would argue this plan remains unsound.**

40. The Local Plan should restrict development near these vital green spaces to reduce population pressure and prevent the building of tall buildings which harm the sense of openness of these spaces.

41. Buildings should be limited in height to the existing low rise of the traditional housing in the vicinity of these green space.

42. The Lea Valley needs to have the same status as Epping Forest and be treated as the valuable resource it is in terms of the benefits it provides for the well being of residents in the most crowded and deprived part of the Borough.

43. Likewise the important part the Lea Valley plays in combatting climate change should be written into the Local Plan. Nature in the Lea Valley needs protection. Recognition needs to

be given to the vital role of the Lea Valley Park and the Marshes in combatting air pollution, city heat and carbon emissions.

44. The reality of extreme flash flooding needs to be understood and the foolishness of building on vulnerable floodplain needs to be stated in the Plan. Recognition needs to be given to the need to create new marshland to absorb flood water. Instead of building on floodplain this land needs to be set aside to create new green and blue spaces.

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