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**From:** julian cheyne [REDACTED]  
**Sent:** 21 September 2023 19:01  
**To:** localplanconsultations  
**Subject:** Local Plan Part 1 Proposed Main Modifications Consultation

To whom it may concern

I am responding to the consultation on the Local Plan 1 Proposed Main Modifications.

1. I cannot see how these 'modifications' answer the key criticism of the inspectors that Waltham Forest was exceeding its housing remit. Waltham Forest is still building beyond what is required by the London Plan. In fact it seems it is now building even more.
2. Not only is it building beyond the requirements of the London Plan but it continues to cram new development into the already overcrowded and deprived south of the Borough.
3. This part of the Borough is the most poorly provided for in terms of green spaces. The addition of yet more developments with tall buildings alongside the Marshes will further harm these vital green spaces.
4. There is no assessment of the Local Plan 2 Site Allocations meaning the specifics of the local plan are being decided by default. 'Modifications' are being applied to a range of development sites which need to be examined for their suitability. There are key sites all along the side of the Lea Valley, most notably at New Spitalfields and Tmeple Mills Lane bus station, which are included without any inspection.
5. Waltham Forest proclaims its concerns for biodiversity and its green spaces. The reality is that the developments being proposed all along the Lea Valley Marshes will harm those green spaces. The tall buildings will reduce the sense of openness and impact on the enjoyment of the open space. The enormous increase in population will put greater stress on these spaces which are vital for people's mental and physical well being and to combat climate change and air pollution. All this is happening in the already most overcrowded and deprived part of the Borough.
6. Waltham Forest makes it plain in its various documents that the views *over* the Marshes and thus of benefit to developers and purchasers of flats are what matter, rather than the views *from* the Marshes. This further demonstrates their lack of concern for these green spaces.
7. Waltham Forest also proclaims that it has launched a Climate Action Plan. However, it shows no concern for the risks it is taking in building on floodplain during this climate emergency. The reality is, as we are seeing all over the world, extreme events in terms of heat and flooding are now common place. Britain experienced its own extreme event with the heat wave in June 2022. We have to anticipate extreme flash flooding. Building in the Lea Valley runs counter to their declaration of a climate emergency. The Lea Valley needs to be protected and land set aside to absorb flood water.
8. Combatting the climate emergency is not just about reducing emissions. It is about taking action to prevent harm which will result from the climate emergency. Waltham Forest is failing to take that action and in fact, by its building programme, particularly in areas of flood plain and next to vital green spaces, is making matters worse.
9. Waltham Forest also states that it plans to create 15 minute neighbourhoods. Because of the lack of green spaces in the south of the Borough this is effectively meaningless. It has to be pointed out that there are no green spaces in most of this part of the Borough. The green spaces on the south-east of the Borough at Wanstead Flats, are in the neighbouring Borough of Redbridge. Hackney Marshes, which will be right alongside the New Spitalfields development, is in Hackney. This leaves the Walthamstow and Leyton

Marshes as the key green spaces for the whole of this part of the Borough. It is not possible for many in this part of the Borough to access these vital green spaces within fifteen minutes. The 15 minute neighbourhood is a fiction. Cramming yet more people into this already overcrowded and deprived part of the Borough will put all the services in this part of the Borough under greater stress making it harder for people to easily access services in general. Green spaces, which are at a premium, are simply not accessible as part of a 15 minute neighbourhood.

10. In its response to the Inspectors Waltham Forest Council made it plain that its reasons for building more homes were not just to meet housing need but to raise council tax funds. It cannot claim, therefore, that its housing programme is simply designed to meet housing need. It is over building in terms of these requirements. Its building programme is not only excessive in terms of housing need but is inherently damaging in the way it is concentrated in the already overcrowded and deprived south of the Borough and along the edge of the most important green and blue spaces in this part of the Borough.

11 These modifications have nothing to recommend them and should be rejected. The plan as a whole remains unsound and it remains unsound in particular in terms of the building proposed in the south and west of the Borough. It is also unsound in terms of specific sites, such as Lea Bridge Station, the Gas Works, Low Hall, New Spitalfields, Temple Mills Bus Station and others, none of which have yet been examined as part of this Local Plan.

Julian Cheyne