

## Waltham Forest Local Plan Examination Consultation Stage 2

For the attention of: Programme Officer – Ms Andrea Copsey [REDACTED]

From: Claire Weiss, Waltham Forest resident. [REDACTED]

My observations on the Inspectors' questions in:

**MATTER 5: THE ENVIRONMENT, CLIMATE CHANGE, FLOOD RISK, POLLUTION AND WASTE MANAGEMENT.**

**MATTER 6: BUILT ENVIRONMENT, HERITAGE, AND DESIGN. LEA BRIDGE: FLOOD RISK.**

relate to these Site Allocations:

SA05 Gas Holders

SA06 Lea Bridge Station Sites

SA07 Former Leyton Wingate Football Stadium

SA08 Church Road/ Estate Way

**I seek to show that the Borough has placed its ambition - for the given quantity of homes to be built - above securing optimum choice of locations and robust processes.**

### **KEY POINTS**

These four Sites in the Lea Bridge area, aiming to provide 1,618 new homes, have prompted development proposals so far for only 918, high proportions of which would be in Flood Risk Zones 2 and 3.

All Sites are within the Lea Bridge Strategic Location, and the Council's 15-minute neighbourhood policy as expressed in the *Lea Bridge Area Framework 2022*, a challenging concept for thousands of new residents.

Three Sites SA05, SA06, SA07 all have one primary school - Sybourn - specified in the 15-minute neighbourhood scope, all looking to S106/ CIL monies for additional school provision.

These four Sites are in close proximity to each other and include 17 proposed tall buildings which would give access to or views onto the Lea Valley but would adversely affect its open character and biodiversity.

The physical and social infrastructure is inadequate for existing residents, as has been voiced by residents in the consultations both on the Draft Local Plan and for Planning Applications for SA05 and SA06. See later paragraphs on public transport and public drainage systems.

## 1. LOCATION OF THE FOUR SITES SA05, SA06, SA07, SA08.

1.1 Sites SA05 (Lea Bridge Gas Holders), SA06 (Lea Bridge Station Sites or Lea Bridge Sites), SA07 (Hare & Hounds or Former Leyton Wingate Football Stadium) are located within the Flood Warning Area for Lower River Lee at Hackney and Walthamstow. **These three Sites are near each other on the floodplain between the two north-south water courses on the east side of the Lea Valley: the Flood Relief Channel (FRC) and the Dagenham Brook.** Balancing the needs for local housing, reducing flood risk, and improving resilience to climate change all face difficult challenges in this location.

1.2 The Sites are located within the Council's Lea Bridge Area Framework (2022), as developed from the Draft Local Plan. The Level 2 Strategic Flood Risk Assessment (L2 SFRA) identifies these Sites as requiring further assessment of flood risk.

[www.walthamforest.gov.uk/sites/default/files/2022-01/60633725%20LBWF%20L2%20SFRA%20AppendixA.pdf](http://www.walthamforest.gov.uk/sites/default/files/2022-01/60633725%20LBWF%20L2%20SFRA%20AppendixA.pdf)

## 2. FLOOD PREVENTION WATER COURSES IN LEA BRIDGE.

2.1 The concrete-constructed FRC and the earth-banked Dagenham Brook, classified by Environment Agency (EA) as 'Main Rivers' are relied on to protect the Lea Valley from catastrophic floods such those of 1947. Their design did not anticipate significant increases of residential buildings at Lea Bridge.

2.2 Further north of Lea Bridge high water from the River Lea is channelled into the FRC and excess waters from the FRC flow into the Dagenham Brook. The flooding risk, from the Lea to riverside housing in Hackney on the west of the Valley, is reduced by these measures. Nevertheless the Lea, the FRC and the Dagenham Brook can be seen at full capacity (or more) twice or three times per year. See following photographs.

2.3 The Dagenham Brook Flood Alleviation Scheme of 2017 involved strengthening the banks of the FRC in Walthamstow, but did not extend southwards to Lea Bridge. The Dagenham Brook has continued to release excess water into storage meadows near Low Hall, in gardens north of Lea Bridge Road and in the Seymour Road Allotment Gardens (adjacent to SA07 and SA08). In citing the need for the Dagenham Brook Flood Alleviation Scheme the EA stated:

*'The River Lee in Walthamstow and other parts of north-east London has a long history of flooding. Dagenham Brook is a small river within the Lee Flood Relief Channel (FRC) system, the main flood defence in the Lower Lee Valley'* (2016)

*'With climate change and urbanisation, water levels have increased and in 2000 and 2014, the Lee Flood Relief Channel ran at full capacity, almost overflowing into the Dagenham Brook. As the Dagenham Brook is such a small watercourse, it would be quickly overwhelmed and could flood properties and infrastructure in the local area.'* (2017).

[themille17.org/2017/07/13/dagenham-brook-flood-alleviation-scheme/](http://themille17.org/2017/07/13/dagenham-brook-flood-alleviation-scheme/).

2.4 When the FRC is at full capacity it runs fast and deep, itself a hazardous environment that people need to be shielded from. Below shows the water level having topped the channel's walls in 2014, 2021. Similar events occurred in 2000, 2016, 2022.

- a) FRC, 183m from SA06 Lea Bridge Station Sites, less than 200m from SA05 Gas Works:  
on 7 February 2014



- b) on 16 January 2021



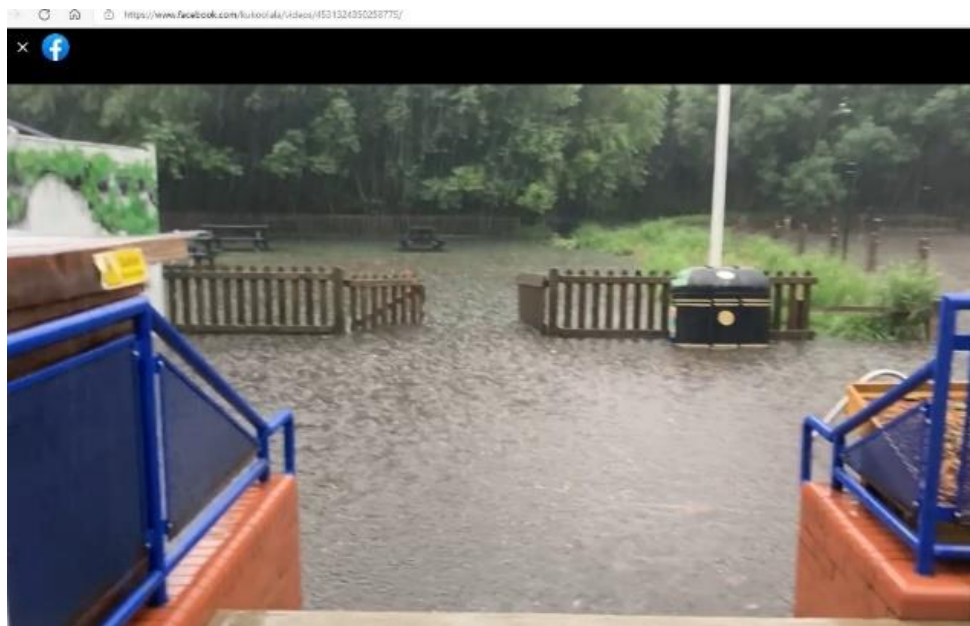
- c) Dagenham Brook at Jubilee Park, adjacent to SA08 Estate Way's fence (right), about 150m from SA05 Gas Works:

on 7 February 2014. Depth: c180cm.



- d) Dagenham Brook banks burst into Jubilee Park, 100m from SA08, 200m from SA05:

on 29 July 2021



e) **Lea Bridge Station groundwater emergence 50m from SA06:**

**on 7 February 2014**



**3. FLOOD RISK DATA as cited in L2 SFRA for the four Sites and other relevant information.**

The three Sites SA05, SA06, SA07 on the floodplain propose residential buildings on land with high flood risk. Their proximity to each other would seem likely to challenge the Exception Testing. **An aerial view that I have annotated is at the end of this section.**

3.1 **SA05 (Gas Holders)** comprises Valley-floor land on the floodplain.

- 3.1.1 Ten (10) buildings would provide 573 homes.
- 3.1.2 **99% Zone 2 and 1% Zone 3.**
- 3.1.3 Between 50 and 75% susceptible to groundwater flooding.
- 3.1.4 Very significant potential for one or more geohazards re infiltration.
- 3.1.5 Medium probability of flooding from rivers incurring depths of 0.5m in centre, 1-1.5m on eastern part of the Site with hazard ratings of Low, Moderate and Significant.

3.2 **SA06 (Lea Bridge Station Sites)** comprises two pieces of landscaped railway steep embankments plus one woodland with flood storage area – all created by the Council's construction c1999 of Orient Way. See photographs at end of section.

- 3.2.1 Seven (7) buildings, one which includes a new entrance for the Lea Bridge station (original one built in 2016) are planned to provide 345 homes.
- 3.2.2 **66% Zone 1, 22% Zone 2 and 12% Zone 3.**
- 3.2.3 High probability of flooding from rivers.
- 3.2.4 Between 25% - 50% susceptibility to groundwater flooding and potential for surface water to pond adjacent to the railway line to west.

- 3.2.5 Safe access/egress likely unfeasible due to surrounding area at higher flood risk.
- 3.2.6 Surface flooding risk to neighbouring areas probably from the existing woodland with flood storage - when cleared.
- 3.2.7 The Developer's Flood Risk Assessment stipulates 86 m<sup>3</sup> flood storage tanks to be installed, each of 3 sub-sites to have separate pumped outfall and run-off to public sewer network. SUDs to be further examined.
- 3.2.8 The adjacent 'Motion' estate (completed in 2020) has already experienced flooding in its tanked basement.

3.3 **SA07 (Hare & Hounds Former Leyton Wingate Football Stadium)** comprises low-lying land adjacent to Dagenham Brook and its flood basin the Seymour Road allotment gardens.

- 3.3.1 **5% in Zone 1, 4% in Zone 2 and 90% in Zone 3, 1% in Zone 3b.**
- 3.3.2 Between 25 and 50% susceptibility to groundwater flood emergence.
- 3.3.3 High probability of flooding from rivers that could incur depths of 0.5-1m and hazard rating of Significant (Danger for Most).
- 3.3.4 Potential for surface water to pond on the Site.
- 3.3.5 An increase in flood risk to surrounding areas should be reduced.
- 3.3.6 Safe access/egress is likely unfeasible from the Site.
- 3.3.7 A place of safe refuge is required as the Site's narrow access is a 'pan-handle' shape, leading to its enclave site within streets of two-storey housing.

3.4 **SA08 (Estate Way/ Church Road)** whose current major use is by a waste disposal plant, comprises land rising from Dagenham Brook.

- 3.4.1 700 homes are proposed.
- 3.4.2 **94% in Zone 1 and 6% in Zone 2.**
- 3.4.3 **75% susceptibility to groundwater emergence**
- 3.4.4 Very significant potential for one or more geohazards re infiltration.

f) Railway embankment base - site '3' of SA06 at Orient Way looking south.



g) Railway embankment base - site '1' of SA06 at Argall Way looking east



h) Woodland base - site '2' of SA06 at Lea Bridge Road looking west

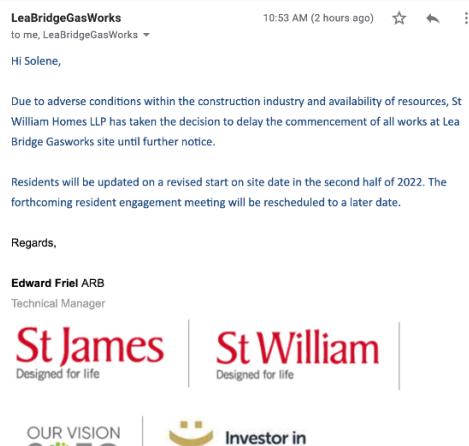


i) Annotated aerial view showing SA05, SA06, SA07, SA08



4. SPATIAL AND FEASIBILITY DATA

4.1 SA05 (Gas Holders). Adjacent to Jubilee Park, a Premier Park of the Borough, the dismantling of the gas holders and works some years ago gave it a welcome open feel. Communities are now dissatisfied with decontamination processes and potential effects on air quality. Application 201329 was approved but construction work has been paused since April 2022:





- 4.2 **SA06 (Lea Bridge Station Sites)**. Application 21075 for the station entrance was approved. Application 212865 subsequently approved. Groundwork preparation has commenced. Local communities are fearful of loss of woodland and flood protection. In the adjacent 'Motion' Estate completed in 2000, residents in its 11, 15 and 18 storey towers will face the building of three higher tower blocks of 23, 26 and 11 storeys on their immediate western and southern aspects.
- 4.3 **SA07 (Former Football Stadium)**. The Council's Cabinet Member has spoken of an adventure playground and a health centre with residences above for this Site, but there have been no developer proposals. No target numbers are given. The Site has a time-limited covenant re playing of sports and is registered as an ACV by the community. It is used in the interim for carparking. **It is the most flood-prone Site.**
- 4.4 **SA08 (Church Road/ Estate Way)**. Three development consortia have presented pre-planning public consultations: RVL, Aitch Group and EVO. The RVL subsequent Planning Application was later withdrawn. The most recent presentation (Evo) was for industrial buildings only. **This Site has the lowest flood risk (94% in Zone 1) and is proposed to provide 700 homes. But so far it has not attracted viable development proposals.**
- 4.5 There will be adverse implications for groundwater levels with the construction of several tall buildings due to piling depths needed on the river valley terrain, and space for tanking and there is concern about the inadequate surface/ foul water drainage infrastructure currently existing in the lowland Lea Bridge area which has been a major issue between residents, the Council and Thames Water for several years, as recorded in the following documents and photographs:
- the residents' reports in Minutes of Lea Bridge Ward Community Forums 2018, 2019, 2020.
  - Community Meeting of 100 residents, 3 March 2020 facilitated by the Council, attended by Thames Water and EA.
  - A resident's Chronology of constant issues with drainage in Hibbert Road as communicated to Thames Water and Council **2013 – 2020**.

**j) Drainage overflows in residents' gardens, Hibbert Road E10 (off Lea Bridge Road)**



**k) Contractors clearing drainage in streets off Lea Bridge Road – two of the many instances 2013 – 2022**



## I) Floods in Lea Bridge:

Lea Bridge Road on 8 August 2021



Perth Road – Lea Bridge Road in August 2022



## 5. STRATEGIC PLANNING - QUESTIONABLE SYNCHRONISATION

- 5.1 Waltham Forest is a Lead Local Flood authority. Synchronisation of its local plan preparation with the wider strategy of the EA during the process to develop its own Site SA06 is scarce. Consultations occurring simultaneously in the summer streets for the Lea Bridge Area Framework and SA06's planning application in 2021 were confusing to members of the public.
- 5.2 The Waltham Forest Development Plan (Core Strategy 2012), the Development Management Policies Plan 2013 and the Local Plan Policies Map 2013 remained in force during the 2016 consultation for Planning Application 153834 for 'Motion' Estate at 97 Lea Bridge Road, now adjacent to Site SA06. The Council's proposed numbers of new homes reflected 97 Lea Bridge Road as a single gateway into the Borough.
- 5.3 In 2021 residents and the public were informed of Planning Application 212865 for the Lea Bridge Station Sites (SA06) with these precise words on notices and letters:
- "The proposed development does not accord with the provisions of the development plan in force in the area in which the land to which the application relates is situated"*

The Planning Committee apparently did not heed public objections to this premise.

5.4 The EA's flood prevention strategy relevant to the four Sites dates from **2013**: [assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/288611/Managing\\_flood\\_risk\\_in\\_the\\_Lower\\_Lee\\_catchment\\_3131d9.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/288611/Managing_flood_risk_in_the_Lower_Lee_catchment_3131d9.pdf)

## 6. PUBLIC TRANSPORT

6.1 **Low PTALS.** While car-free housing developments are intended for the four Sites, the relevant transport hubs have low PTAL levels reflecting inconvenient rail transfers to the City, and reduced access to Shoreditch and the West End via long bus journey times.

PTAL ratings taken from [tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat](https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat)):

- Site SA05 Gas Works: **PTAL 2.**
- Site SA06 Lea Bridge Station Sites: **PTAL 2**, a reduction from 2/3 resulting from the removal by TfL of the entire 48 bus route.
- Site SA07 Hare & Hounds/Former Leyton Wingate Football Stadium. **PTAL 3.**
- Site SA08 Estate Way/ Church Road. **PTAL 2/3.**

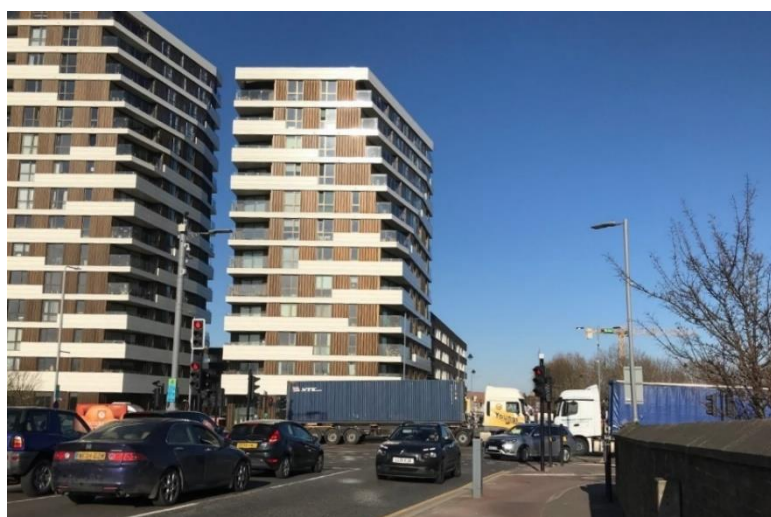
6.2 **Building investment:** It is unclear how these low PTALs could justify the investment in new buildings since there are no proposals that would amplify the transport infrastructure at Lea Bridge and raise the PTALs.<sup>1</sup>

m) **Lea Bridge Road/ Argall Way/ Orient Way crossroads** which will form the centre of SA06. 'Motion' estate already occupies north-east corner.



<sup>1</sup> Possibly the only feasible traffic improvement to the through-traffic saturated A104 would be a tramway.

m) Current usage of the crossroads – at Orient Way and Lea Bridge Road.



- 6.3 **Resident number implications.** Lea Bridge Station 2016 re-opening was predicated on the housing needs of City commuters. Meanwhile the Covid pandemic has changed needs for daily travel and prompted demand for accommodation that will support home-working. The 'Motion' 2020 estate has still not sold all units.
- 6.4 **Connectivity.** Lea Bridge station is not part of TfL Overground, but belongs to Greater Anglia (GA). It offers no destinations within Waltham Forest but a key benefit is being one-stop from Stratford. However the line's terminus platform offers difficult transfers to the Liverpool Street-bound lines which, the Council's Public Transport Consultative Group has been informed, are unlikely to be eased in Stratford station's improvements. The reliance on GA for PTAL rating to support developments poses an uncertainty.
- 6.5 **Transport infrastructure shortcomings.** Buses on routes 55 and 56 to the West End and Smithfield are overcrowded, and journey times have not shortened even with the provision of state-of-the-art segregated cycle lanes the full length of the Lea Bridge Road in the Borough. Lea Bridge has no north/south public transport linking its residents and the station to Walthamstow or Leyton Mills shopping centres since the 20-year-old Orient Way and Argall Way have no bus routes.

## 7. EFFECT OF PROPOSED DEVELOPMENT SITES ON THE LEA VALLEY

7.1 **A reading of the Local Plan fails to reveal the Lea Valley as sharing context with these four Sites.** The Local Plan standpoint starts from the urban context and does not adequately specify that all the Sites share the benefit of open skies above Leyton Marsh, itself within the Borough's borders.

7.2 **All four Sites benefit from views of/ proximity to biodiversity status features of the Lea Valley:**

- Walthamstow Wetlands (Ramsar Convention on Wetlands of International Importance)
- Lea Valley Special Protection Area (SPA).
- Site of Special Scientific Interest (SSSI): Walthamstow Marshes
- Metropolitan Sites of Importance for Nature Conservation (SINC): Walthamstow and Leyton Marshes; Dagenham Brook; Waterworks Meadow/ Field.
- Waterworks Nature Reserve (Green Flag) one of largest bird hides in London, situated opposite to, and less than 200m from, SA05 and SA06.

7.3 **Tall buildings.** A resident's contribution to the Council's *Direction of Travel* 2019 Local Plan consultation stated: '*One cannot surround Lea Valley Park with tower blocks and expect it to be as enjoyable and successful*' to which the Council responded:

*'Noted the visual, functional or environmental impact of tall buildings on Lea Valley Park' . However the Lee Valley Regional Park Authority (LVRPA) picks up on this as not being followed through, identifying that the [SA06] development, given its size and location, will generate a regular and sustained increase in footfall to the Park. The potential impacts of this are not considered within the supporting planning documents, although the benefit of the proximity of these green spaces is recognised in terms of recreational facilities available to residents.'*

7.3.1 Natural England urge that final Local Plan should give great weight to the protection of Lee Valley Special Protection Area (SPA) via evidence being gathered on the '*potential threats to the integrity of the SPA through planned development, including recreational pressure and hydrological impacts*'.

7.3.2 There is an absence of consideration that inappropriately sited tall buildings on the edge of the Lea Valley will limit people's feeling of freedom from urban constraints and reduce their sense of enjoying nature in the protected environment.

7.4 **Skyline diagrams.** Source: [www.walthamforest.gov.uk/sites/default/files/2021-12/Draft%20skylines%20study%20south%20Waltham%20Forest%20sites%20part%201\\_Nov.pdf](http://www.walthamforest.gov.uk/sites/default/files/2021-12/Draft%20skylines%20study%20south%20Waltham%20Forest%20sites%20part%201_Nov.pdf)

7.4.1 SA05 (Gas Holders). Looking north-westwards from the Site (Key View 05), the two tall buildings will take away from Jubilee Park its feel of openness as envisaged in the Park's Management Plan 2014. An eastwards view from Leyton Marsh pictured in the Site developer's planning application shows the tall buildings in a cluster with the Motion towers and the planned SA06 Site.

7.4.2 SA06 (Lea Bridge Station Sites). The only Skyline perspective of a view from Leyton Marsh is the approach from Lea Bridge Road, emphasising the urban context (Key Views 03, 04) of SA06 as an ‘arrival point’. There is no illustration of how this Site would look from the Waterworks Nature Reserve 200m westward.

7.4.3 SA08 (Church Road/ Estate Way). Skyline Key Views 06, 07 and 08 illustrate the existing open feel of two green assets – Jubilee Park and Seymour Road Allotments – being compromised with a tall building of 16 storeys. This would dominate Marsh Lane and overlook the locally listed 18<sup>th</sup> century Ice House and the historical Lammas Cottage next to Dagenham Brook.

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3,000 words