**Name of objector**

**Postal address of objector**

**Date**

Planning Department, Waltham Forest Town Hall, Fellowship Square, 701 Forest Road, Walthamstow, London E17 4JF

[dmconsultations@walthamforest.gov.uk](mailto:dmconsultations@walthamforest.gov.uk)

**To: To Waltham Forest Planning Committee**

**Re Planning Application 212685 – Lea Bridge Station Sites**

**I object to the Proposed Development for these reasons:**

**This scheme represents the over-development of a disparate small pieces of land.** 26- and 23-storey blocks overlooking the Lea Valley is totally unacceptable as people visit the open space to get away from the urban environment.

**New public realm space and green space is not needed** since it already exists on the proposed sites. Outdoor play space should not be positioned high up because of the exposure to rising polluted air.

**The scheme’s benefits do not compensate for the adverse impact of the proposed tall buildings.**

During four years of public discussions I and many residents have consistently voiced preference for lower buildings, based on the Vision document of 2017 guidelines: ‘*any new housing developments in the Lea Valley Eastside area will mainly be approx. 5/6 storey properties’* and *‘Massing and density for any new neighbourhood should generally be at a human scale’*. The applicant has ignored this and now proposes towers of 26 and 23 storeys.

**The development is not sustainable since tower blocks are damaging to the environment** due to the amount of the earth's resources they consume and the pollution they create during the construction phase. They are structurally demanding as they need high proportions of steel and concrete to stop them from swaying. A very tall building has at least double the carbon footprint of a 10-storey building of the same floor area due to the resources that go into building it. Taller buildings that stand up above their neighbours are more exposed to strong winds and more hours of direct sun so energy use for heating and cooling is increased. This negates the applicant’s case that clustering tall buildings around stations is sustainable for reasons of reducing traffic.

**The scheme cannot be described as ‘accessible’**. The centre of the scheme is a massive main road intersection used constantly by heavy industrial traffic. The existing vehicular pollution is buffered by green open space on three corners of the crossroads, including the Pocket Park, and 122 trees. Siting a major residential estate at this junction would recklessly ignore the recent Coroner’s verdict that air pollution "made a material contribution" to the dreadful death of 9-year-old Ella Adoo-Kissi-Debrah, who lived near the highly polluted South Circular Road in Lewisham. No visual images of the proposed scheme have shown the reality of traffic queues with HGVs, buses and commercial vans. The Planning Committee councillors should view the site in person during any weekday.

**The proposed scheme’s flood mitigation and prevention is environmentally unsound**. Geographically the sites are on the floodplain of the River Lea. The Environment Agency’s provisions of July 2021 have not kept up with the climate-change extreme weather conditions experienced in Lea Bridge and Walthamstow in July and August. The sites should remain as permeable land and the trees on them should remain in order to protect the older streets in Lea Bridge.

**The proposed loss of the Orient Way Pocket Park and the other two open spaces** does not accord with national or local measures to address the Climate Emergency, which the Council declared in 2019. The Pocket Park is an essential green lung in an already highly polluted area. It is a haven of peace in this very urban landscape and must be preserved. Its role as an established habitat for wildlife is important in the buffer environs of the Waterworks Nature Reserve which is less than 200m from the sites, and contains one of the largest bird hides in London attracting migrant and water birds. The Flood Relief Channel only 183m from the sites provides habitats for foraging bats and kingfishers. These should all be protected from invasion of vertical space by high towers.

**The proposed mixed uses are not feasible and would lead to higher costs.** Commercial units in Coronation Square had to be baled out and community units in Motion were not implemented. Yet the Council has awarded the LVRPA £1m for the Ice Centre redevelopment containing a community hub which is 300m from the Lea Bridge station.

**The claimed need for the scheme’s mix of units does not stand up to the changed market conditions**. Some 10% of the units in the Motion estate are unoccupied, and there are vacant units remain in developments 338 Lea Bridge Road and 256 Church Road, only 350m from the station sites. Local key workers cannot afford the affordable units but the Council is funding the needs of people on the Housing Register by placing them in Motion or sending them out of the Borough.

**While the applicant anticipates S106 and CIL payments to be awarded from the proposed scheme these funds are inadequately monitored** and canresult in wastage of public funds while providing profits for suppliers. The Lea Bridge station was built using Borough CIL funds in 2016 but Planning Application 202850 has imposed extravagant remodelling on it after only five years of the reopening.

**While the formal planning notice of 212685 states ‘*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 Council Leader states elsewhere ‘*the Proposed Development is considered to be in accordance with both national planning policy guidance and the Development Plan when read as a whole.’* This total contradiction risks making a mockery of the planning process when the situation is that:

* The Council’s key strategic documents and plans of 2012/ 2013 are still in force. The *Lea Bridge & Leyton Vision of 2017* is the base document. The Council is working on a Draft Local Plan including a *Lea Bridge Area Framework* that has not yet been adopted.
* The 212685 proposals are not based on sustainable development, and underlying material conditions indicate major concerns, therefore the applicant is not justified in assuming that any provisions in the Council’s current Draft Plan would be adopted.
* The benefits of constructing 300 homes do not outweigh the known drawbacks of building this massive scheme since overall life-changing events - resulting both from the Covid-19 pandemic and the adverse effects of climate change - are affecting Waltham Forest, and the accommodation needs of 9,000 people on the Housing Register are not met by the scheme.

**The Planning Committee may wish to consider** that while the collective progression of civilisations over centuries is still largely measured by the ability to build bigger, faster and taller, we have come to the point where we must put the limits on ourselves and apply our forces to the challenge of building genuinely sustainably, or risk destroying the very future that will hold our legacy. /ends.