



Planning Policy Team
London Borough of Waltham Forest
Town Hall
Forest Road
London
E17 4JF

By email to: localplanconsultations@walthamforest.gov.uk

3rd October 2024

Dear Sir/Madam,

Re: Waltham Forest Local Plan Part 2 Site Allocations Consultation

CPRE London is a membership-based charity with 2500 members across London, concerned with the preservation and enhancement of London's vital green spaces, as well as the improvement of London's environment for the health and wellbeing of all Londoners.

We believe the following Site Allocations are **unsound**:

- **R19002 - New Spitalfields Market**

Proposals for this site will have a major impact on the adjacent Metropolitan Open Land (MOL), impacting on its openness. The site also is at risk of flooding. The proposals highlight the attractive views of, not from, the Marshes – in other words discusses the benefits of the people living in the new flats, not the dis-benefits of people enjoying the marshes. This also applies to the site as part of the Lea Valley Regional Park. Given the risk of flooding, our recommendation is the site is either returned to marshes or the current proposals scaled back significantly.

- **R19047 - Lea Bridge Station Sites**

Proposals include inappropriately tall buildings, impacting on the nearby MOL and Lea Valley Regional Park. This would involve the destruction of a relatively recently installed pocket park and trees. It would have an enormous impact on nearby houses. It would increase flood risk and reduce the ability to manage flooding in the area. Geographically the sites are on the floodplain of the River Lea. They should remain as permeable land or a minimum equivalent green space should be found to replace that which will be lost. With more effective design and some consideration of other nearby sites, the same number of units could be achieved while more green space and trees are retained. There are opportunities to reclaim space given to roads and park ('grey' space) and every opportunity should be used to reconfigure and reclaim space from the road rather than using green space.



Overall, we believe that throughout the consultation document the Council could demonstrate greater ambition for increasing the amount of green space in Waltham Forest. In particular, we would like the Council to include new green spaces, street parks and tree planting in site allocations wherever possible, especially in parts of the borough where there is not enough.

- **Thames Water Depot – Lea Bridge Road**

This site is not included in the allocations, but Waltham Forest Council should work with local campaigners to ensure it is protected from development and opened up to public access. It could be re-imagined as a place for wild swimming and community horticulture, with the vital habitat along the river designated as a nature reserve and connected to the neighbouring Middlesex Filter Beds Nature Reserve and other parts of the site left to 're-wild'. See the East London Waterworks Park website for further information:

<https://www.elwp.org.uk/Home.htm>

- **Land to the East of Banbury Reservoir**

These neglected and fenced-off green spaces are not included in the allocations, but we hope Waltham Forest Council will continue to support plans to open them up to the public as part of a coherent new District Parkland. For further information please see:

<https://brparkcampaign.org/>

Thank you for the opportunity to provide comments on this important consultation.

Yours sincerely,

John Sadler
Campaigns Officer
CPRE London