

**WALTHAM FOREST LOCAL PLAN  
RESPONSE TO THE COUNCIL’S NEW/UPDATED DOCUMENTS OF SEPTEMBER 2022**

**JANUARY 2023**

I am a member of Waltham Forest Civic Society. I am submitting comments in my personal capacity on some sites which the Council is currently proposing under Part 1 of the draft Local Plan as sites for development (parts of “strategic locations” / locations for buildings of 10+ storeys / “allocations” for new housing). The sites on which I comment are known to me personally or have been visited by me recently.

My observations are intended to assist in relation to the Inspectors’ Matters, Issues and Questions:

- Questions 3.1(c) (whether it is reasonable to rely on the housing allocations in Part 2 of the draft Local Plan (“LP2”), given the planning objections to development of the scale and height proposed) and 2.4 (whether the scale and distribution of housing growth is justified)
- In the case of particular sites listed by the Inspectors, also Question 3.1(e)
- As regards my comments on effects on Epping Forest / the Lea Valley, the effects on Epping Forest also address Question 1.7 (the methodology of the SANGs strategy, as regards the numbers of visitors to Epping Forest to be expected from the developments proposed) and the effects on the Lea Valley will also be relevant to Question 1.8 (whether the “quality” of the proposed SANGs has been robustly assessed)
- As regards my comments on effects on the skyline (including the skyline as seen from Epping Forest land and from the Lea Valley) also to Question 6.3 (whether the proposed locations for tall buildings are appropriate).

Where I identify sites by two “SA” numbers (the second in brackets), the first number is intended to be the Council’s current number (as given in the spreadsheet, LPE31) and the second the number in the most recent draft of LP2.

SITE	GENERAL COMMENTS	HERITAGE	EFFECTS ON EPPING FOREST/LEA VALLEY	EFFECTS ON THE SKYLINE
<b>SA16 (SA 15) The Territorial Army Centre</b>	This site is adjacent to Epping Forest and used by the Territorial Army. This site should be retained for Government/Military use such as riots or major disaster. It was used as a riot centre during the battle over the M11 Link road. Where else will the military be able to be based in the area?  It is also unsuitable site for residential being so close to heavy congested roads. Extra traffic will not improve access to Whipps Cross Hospital as the new hospital building develops.	A listed War Memorial is on the site and would need protection. The site will have to be sensitively developed if the Army ever sell it.	For years the Conservators of Epping Forest encouraged buffer land between the forest and the Urban environment to help protect the forest from increases in the numbers of people living immediately next to it. Planning applications for developments adjacent to	Planning Policy in recent years would not have allowed St George’s Court to be built so this 11 storey building should not be taken as a precedent to allow a tower block on this site. Any development on this site needs to preserve the open aspect of the buffer land so when viewed from the forest it is not seen above the tree line.

			St George's Court (which is located near this site, on the Lea Bridge Road by its junction with the Whipps Cross Road) have been turned down by the Council to protect this buffer land so this site needs to be regarded as part of the boundary between the forest and the built-up area.	
<b>SA 25 (SA 24) Norlington Road Sites</b>	An industrial site in a Victorian Terrace residential area. Perhaps real houses with gardens in a traditional form should be considered.		.	High tower blocks would not be suitable for this site as it nestles amongst 2 storey Victorian Terraces. A very high block would be seen from the forest which would be detrimental to forest visitors
<b>SA 26 (SA 25) Walthamstow Central Bus Station</b>	There are no plans for a new bus station so where would the existing one be re-located? 200 new homes would be hard to fit in without building very high. An attractive Town Centre needs open space to enable visitors not to feel hemmed in by the buildings. The plans for the Mall will remove over 30% of the existing open space. The current bus station is an open building whereas bus and railway stations which are not open and have low roofs (as with the platforms at Birmingham New Street) feel oppressive.	Adjacent to the listed Grade II Central Library donated by Carnegie, which needs to be protected from inappropriate development. Currently it is in a fairly open space which helps to enhance its features. This would be negated by a tall building looming over the library.		The 34 and 27 storey towers being constructed on the adjacent Mall site will damage the current street scene, so another block on the bus station will only degrade the area further, which will have an impact on the viability of the Town Centre. People appreciate the Victorian architecture more than they do tall buildings looming over them. The new Juniper House 18 storey building can be seen from the Walthamstow Village Conservation Area so a tall building on the bus station site would also be visible. Very tall buildings on this site would be seen from Epping Forest and the Lea Valley which would degrade the views from the forest and the valley.
<b>SA 29 (SA 28) High Street Sainsburys</b>	No sign of Sainsbury closing. No plan app. If Sainsbury closed the car park, which is essential for shoppers at a supermarket, would not be available to help sustain the rest of the Town Centre. This would make the Town	Adjacent to St James Conservation Area whose character must be protected.		Limit height to protect the character of the surrounding area, in particular the High Street which is fundamentally a Victorian terraced High Street. This is what residents find attractive.

	Centre economy more dependent on small traders. The opportunity for shoppers to come from further afield would be lost. More residential development would increase the congestion of the market and the Town Centre endangering its attraction.			
<b>SA 30 (SA 29) Wilkos_Walthamstow High Street</b>	No sign of Wilko closing. No plan app. As retail changes this site may be needed for other uses, but residential is not ideal as it is beside the very busy and congested market. If the lower part of the High Street is to thrive it must complement the St James Street Quarter, which is how the council markets the area around the junction of the High Street and St James Street. It could be developed for small businesses in a similar way to the CRATE development in St James Street.	Adjacent to St James Conservation Area whose character needs to be protected.		There must be a height restriction applied to this site of no more than 5 storeys. The context of the surrounding Victorian Terraces will be spoilt if the development is too dense and high. It needs to complement the current street scene.
<b>SA 31 (SA 30) Osborne Grove</b>	Small site behind a terrace in Palmerston Road. No plan app			Height must be similar to surrounding Victorian Terraces. May be a mews type development.
<b>SA 32 (SA 31) Stow Car Wash &amp; Valeting</b>	Currently the site is occupied by the Trades Hall (a community centre) and a redundant Texaco petrol station fronting Hoe street. There is no sign the Trades Hall will close, but if it did this site needs to be considered for a community meeting place.			Height must be similar to the surrounding Victorian Terraces. Any development needs to complement the intact Victorian Terraces on the other side of Hoe Street. Ideally it should create a terrace of shops with flats above to replace those that were lost decades ago.
<b>SA 41 (SA 40) Crown Lea</b>	Crown Lea has started to vacate the site which was a storage centre for building site fencing. Apollo Janitorial Supplies owned part of the site and have moved. A 7 storey block of flats with a frontage on to Wood Street have recently been finished, but no planning application submitted yet for rest of site. Apparently the 2 companies could not agree to combine both sites. Not an ideal way of developing a confined site with a glorious view over Walthamstow cricket ground.	Site of one of the original film studios in the early 1900s, but no remnants left of the studios. The new block has been named Picture House E17 as a reminder of its history. It is within sight of the Grade II listed Clock House in Wood Street.	A short walk to Epping Forest, but only scope for a small development so no threat to the Forest.	Height for the remainder should be less than the recently-built 7 storeys to protect the existing Victorian Terrace street scene.

<p><b>These sites are best taken as one site as they are adjacent. The car park is owned by the Council.</b></p> <p><b>SA 42 (SA 41) Wood Street Station Site + Travis Perkins</b></p> <p><b>SA 43 (SA42) Travis Perkins</b></p> <p><b>SA 44 (SA 43) Brandon Road Car Park</b></p>	<p>SA42, SA43 and SA44 should be developed as one site. In the Council's original LP2 document Wood Street Station was shown to have the potential for 15 flats. But that is impossible without building above the station, which is too expensive and totally unacceptable. The station needs a lift and could be funded by the developer of the Travis Perkins site.</p> <p>The cycle shop, in the railway arches below Wood Street station, is an important facility for cyclists and should be re-provided, and that needs to be made clear in the Local Plan.</p> <p>A new station entrance, possibly from the Travis Perkins site, should be considered. This would make the junction of Fyfield Road and Wood Street less congested and much safer for passengers.</p> <p>In LP31 the two sites have been amalgamated and suggests 65 homes.</p> <p>It is not clear what is being proposed for these sites as LPE31 shows 15+50+8 = 73 which is very low, although the council suggests "re-provide employment floor space". Currently it is a builder's merchant so the number of jobs is low. The heavy lorries delivering and picking up from the site clash with the local traffic and a change of use would be beneficial.</p> <p>A development of traditional houses with gardens is needed for larger families and this site lends itself to that</p>		<p>The Whipps Cross Hospital site developers claim the station will be one of the main pedestrian routes to the new hospital. This route will also give access to Epping Forest increasing pressure on the forest.</p> <p>The council suggests in LP2:</p> <p><i>"a development design that focusses on ensuring the proposed buildings, landscaping and infrastructure layout maximise on-site green spaces and minimise access to Epping Forest SAC."</i></p> <p>There are currently no green spaces on these 3 sites so they would have to be created.</p> <p>Access to Epping Forest is a short walk up Fyfield Road so residential development on these sites would increase footfall in the Forest.</p>	<p>To achieve the low density the council suggests a Mews type development should be considered, which would be low rise, but would be overlooked from the station platform.</p>
<p><b>SA 70 (SA 67) Barrett Road</b></p>	<p>Originally this site was the goods yard for the railway. Over the years housing has been built on the land leading up to the railway and this site is now home to a landscape, garden machinery and a roofing wholesaler business and a small cafe.</p>			

	Continued use as a business site seems the most appropriate use. If the whole site came up for redevelopment a plan to provide an active frontage along Wood Street should be encouraged.			
<b>SA 78 (SA 75) Lea Bridge Hotel Site</b>	Parts of the site, which includes the Ibis hotel, were completed some years ago leaving small packets of redundant land, in particular close to the railway making it hard to be redeveloped.			Low rise has to be specified to complement the existing Victorian terraces.
<b>SA ? (SA 76) non-Homebase element of site</b>	Willow House, the old housing offices, is waiting a planning application, but the application is likely to be for 18 storeys the same as the adjacent Homebase site.		Development here will increase the footfall in the forest which is only a 10 minute walk away.	18 storey would be too high to complement the surrounding buildings. The Family and Homes site opposite is only 11 storeys and there is a range of heights on the Homebase site. The view down Forest Road from the Waterworks junction is significantly impacted by tall buildings as the view is downhill to the development. Also, as with the Homebase site, high buildings here would be seen from Epping Forest which urbanises the view from the forest.
<b>EMERGING - Texaco 817-823 Forest Road</b>	Texaco garage closed for refurbishment just before lockdown 2020. No work was done, and it was boarded up. A for sale sign has appeared, but no sign of any activity or plan app.	This site is close to the Locally Listed Waltham Forest College and opposite the Grade II listed Thorpe Coombe hospital site. Any development on this site needs to complement these buildings.	Epping Forest is a 20min walk away and this site, if used for residential, would impact on the forest.	The College, Town Hall complex and Thorpe Coombe hospital sites create a grand street scene and this needs to be preserved and enhanced when developing this site. All the existing buildings are very large but not seen as tall buildings.