

I, David Boote, 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 reference number for this representation is **1244414**. The sites on which I comment are known to me personally and 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 SA47 (SA46) Dog Track Carpark and Sainsburys***

Local Plan housing unit allocation = 430

Site boundaries

To the south-west of the site runs the three-lane motorway-standard North Circular Road (A406). To the north-east of the site runs the River Ching with a pedestrian and cycling track alongside. At the south-east end of the site is the access road for the large Sainsbury’s store and a children’s nursery at the far, north-western end of the site (‘Bright Start Day Nursery’), a Holiday Inn Express hotel, and a small bus depot occupied by Stagecoach (previous occupant Hackney Community Transport),.

## Site neighbours

On the other side of the North Circular Road is green open space, partly school playing fields, partly pasture for horses, with a fenced pedestrian right of way connecting the North Circular Road (crossed by a footbridge from the Sainsburys site) with Billet Road by the Walthamstow Academy school and with Folly Lane (limited vehicle access). Folly Lane curves around Banbury Reservoir, to which public access may be provided in future, to Tottenham Marsh which has public access now and to the Lea Navigation towpath.

The River Ching and its accompanying pedestrian and cycling track on the north-eastern edge of the site provide a belt of greenery including well established trees, with a wider tree and grass area by Chingford Road (A112). The track connects the Sainsburys site in a northern direction with the Morrisons Supermarket, Site SA49 (SA48). To the north-east of the River Ching are gardening allotments. The River Ching flows under Chingford Road and upstream (eastwards from the Sainsburys site) there is a pedestrian and cycling track connecting with Cavendish Road in Highams Park.

## GENERAL COMMENTS

The four sites on which I comment are to the north-east of the North Circular Road between Chingford Road and Hall Lane, a belt of land which used to be light industrial and is now mainly retail warehouses. The area is flat, the floodplain of the River Ching connecting with the floodplain of the River Lea. The sites would therefore require some kind of expensive provision to ensure the safety of residents in the event of excessive demand on the area drainage. See comments on SITE SA47 regarding air pollution and noise from the North Circular Road.

The Sainsbury's on this site SA46 (47) includes an Argos, a "click and collect" car park collection point and a petrol station. Its car park is intensively used by shopping customers.

Electricity pylons cross the site, removal of which will be costly.

The site is not within reasonable walking distance of a station and relies upon bus routes for its public transport connectivity.

## HERITAGE

Confusingly Sainsbury's and Argos call their store 'Walthamstow Low Hall' which was a medieval manor house at an entirely different location. The old house now underneath the bus depot was called Salisbury Hall and has been the subject of archaeological excavations.

Part of the Holiday Inn Express hotel is the former Hitchman's Dairy which has been preserved for its attractive art deco-ish exterior. It is locally listed as the former St Ivel office building, Walthamstow Avenue E17, erected in 1939 for Hitchman's Dairies Ltd in a popular 30's style with white rendered finish, Crittall windows and green pantiled roof. This attractive building would be adversely affected by any visually bulky development around it. Its current setting by the North Circular means that it is best appreciated from inside a vehicle.

To the east of the Sainsbury's site, across Chingford Road, is the facade of the former dog racing track and stadium (listed Grade II), which has become one of the main visual images by which people identify Walthamstow (despite it being on the edge of Chingford). Its beauty comes much from

reflecting light falling on it from the west, and development on the Sainsbury's site above a certain height would therefore detract from its listed building value.

The Catholic Christ the King church, of an interesting 1996 design by Scott Tallow Walker, but not listed, is to the south-east of the site, on the edge of a roundabout over the North Circular Road. This attractive building would be adversely affected by any visually bulky development around it but its current situation is poor.

#### EFFECTS ON EPPING FOREST / LEA VALLEY

This site is an important one for walking routes linking the public open space on the western side of Waltham Forest, the Lea Valley, with the public open space on the eastern side of Waltham Forest, Epping Forest. See comments on SITE SA47 regarding air pollution in the North Circular Corridor.

Green public open space can be accessed from the site :

by foot on the footbridge over the North Circular Road, then along footpaths to the 'community forest' by Folly Lane, perhaps 15 minutes walk, to Banbury Reservoir were it to be opened for public access, about 30 minutes walk; currently accessible Tottenham Marshes and the Lea Navigation are about 30 to 40 minutes walk

by bicycle along the Ching Way and quiet cycling routes through Highams Park to Epping Forest where it is crossed by Oak Hill.

Epping Forest would be the most obvious extensive green public open space that might be accessed by public transport from this site (bus route 97 to Chingford; bus routes 34, 215, 357 or W11 to Walthamstow Central then Overground to Chingford).

#### EFFECTS ON THE SKYLINE including effects on the skyline as seen from Epping Forest/ the Lea Valley

Waltham Forest is a predominantly low rise outer London suburb and those who have chosen to live in the Borough are choosing that above high rise inner city locations. Buildings on this site above about 5 storeys will be visible from some distance, creating a new skyline for northern Walthamstow and southern Chingford of an inner city character, and more so with higher buildings visible from the Lea Valley and Epping Forest.

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#### **SA49 in LPE31 Housing Trajectory (LP2 ref SA48)**

Morrisons Supermarket and Car Park

Local Plan housing unit allocation = 270

#### Site boundaries

This site has as its southern boundary the access road Morrison Avenue on its northern edge housing on the south side of George Road (mainly two storey, three storey at the western end). At the eastern end is a Bannatyne fitness centre and to the east of that two storey houses facing on to Chingford Road.

#### Site neighbours

To the south of the site, across Morrison Avenue, is the Goals hard surface small pitch football centre, and the Ching Way pedestrian and cycle track past Sainsbury's to Chingford Road, and to the

east of that Salisbury Hall Blades Playing Fields accessed from Chingford Road. To the west of the site is part of the Chingford Hall housing estate, mainly or entirely social housing, two and three storey. To the north are water drainage tanks, beyond which, across Burnside Avenue, are allotments, and, to the north of the eastern part of the site are streets of two storey houses off Chingford Road. Across Chingford Road, east of the site are also streets of two storey houses.

#### GENERAL COMMENTS

The area of and around this site also is flat and low-lying, the floodplain of the River Ching connecting with the floodplain of the River Lea. There appear to be drainage tanks, the adequacy of which would need to be reviewed should this site be developed for housing.

The site is not within reasonable walking distance of a station and relies upon bus routes for its public transport connectivity.

#### HERITAGE

No comments to make.

#### EFFECTS ON EPPING FOREST / LEA VALLEY

Green public open space might be accessed from the site :

by foot on footbridges over the North Circular, to the 'community forest' by Folly Lane, perhaps 15 minutes walk, Banbury Reservoir were it to be opened for public access about 25 minutes walk; currently accessible Tottenham Marshes and the Lea Navigation are about 25 to 35 minutes walk

by bicycle along the Ching Way and quiet cycling routes through Highams Park to Epping Forest where it is crossed by Oak Hill.

Epping Forest would be the most obvious green public open space that might be accessed by public transport from this site (bus route 97 to Chingford; bus routes 215, 357 or W11 to Walthamstow Central then Overground to Chingford).

#### EFFECTS ON THE SKYLINE

Construction of buildings above the height of the 2 and 3 storey height of surrounding housing, so perhaps more than 5 storeys high , could have a detrimental effect on those living in the area.

Buildings above a certain height, perhaps 10 storeys, will be visible from the banks of Banbury Reservoir to which public access may be provided in future, as part of a chain of public amenity space.

See comments on SITE SA47. Buildings on this site above about 10 storeys will produce an inner city character.

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#### **SA77 in LPE31 Housing Trajectory (LP2 ref SA74)**

Deacon Trading Estate / Cabinet Way

Local Plan housing unit allocation = blank

on the North Circular Road across a cycle and foot path and grass verge

Site boundaries

The western boundary is the busy North Circular Road (A406). The northern boundary has a petrol station and the gardens of houses on Westward Road. On the eastern and southern boundaries is the Chingford Hall social housing estate, Hazel Way to the east and Ching Way to the south.

#### Site neighbours

Across the North Circular Road to the east is a Costco wholesale warehouse. Beyond that is a water pumping station on Harbet Road, the Greaves Pumping Station of 1903 near the Banbury Reservoir (not listed). A Meridian Water planning document suggests “Greaves Pumping Station on Folly Lane (1903), although just outside the Meridian Water boundary, could be explored in terms of its re-purposing potential, enhancing awareness of the area’s heritage in addition to the waterways” [https://www.enfield.gov.uk/data/assets/pdf\\_file/0017/4634/elaap-meridian-water-spatial-framework-planning.pdf](https://www.enfield.gov.uk/data/assets/pdf_file/0017/4634/elaap-meridian-water-spatial-framework-planning.pdf) To the north is the junction of Hall Lane with the North Circular Road and then the Cork Tree Retail Park site SA48 (SA47). To the east and south is the Chingford Hall housing estate. The Meridian Water development area in the London Borough of Enfield is to the north-east of the site.

#### GENERAL COMMENTS

The site is on a belt of land which used to be light industrial and is now mainly retail warehouses. The area is flat, the floodplain of the River Ching connecting with the floodplain of the River Lea. The sites would therefore require some kind of expensive provision to ensure the safety of residents in the event of excessive demand on the area drainage. See comments on SITE SA47 regarding air pollution in the North Circular Corridor.

#### HERITAGE

Buildings above a certain height will be visible from the attractive Greaves Pumping Station (see above) but its location will suffer for the foreseeable future in being near the North Circular Road, and near the forthcoming Meridian Water development in the London Borough of Enfield.

#### EFFECTS ON EPPING FOREST/LEA VALLEY

Green public open space might be accessed from the site :

by foot or bicycle through the pedestrian and cycle subway from Hall Lane under the North Circular, then beside it, to Harbet Road and Folly Lane to the community forest there, Banbury Reservoir were it to be opened for public access about 15 minutes walk (currently dangerous and unpleasant) and to Tottenham Marshes and the Lea Navigation are about 20 minutes walk

Epping Forest would be the most obvious green public open space that might be accessed by public transport from this site (bus route 444 to Chingford; bus route 34, to Walthamstow Central then Overground to Chingford).

#### EFFECTS ON THE SKYLINE

Buildings above a certain height, perhaps 5 storeys, will be seen from housing in adjacent streets, and buildings above a certain greater height, perhaps 10 storeys, will form part of the skyline for the Lea Valley and would be visible from the banks of Banbury Reservoir to which public access may be provided in future, as part of a chain of public amenity space. See comments on SITE SA47

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**Site SA48 in LPE31 Housing Trajectory (LP2 ref SA47)**

## Cork Tree Retail Park

Local Plan housing unit allocation = 0

### Site boundaries

Along the south-west side runs the busy North Circular Road (A406) and the adjacent Walthamstow Avenue. On the south-east side is Hall Lane A1009. On the north-west side is a water channel, equivalent to the medieval channel serving Chingford Mill, and coming off the River Lea. On the north-east side is a residential area comprising three storey Mandeville Court and the two storey houses on Hollywood Road.

### Site neighbours

On the other side of the North Circular Road, south-west of the site, is a motor vehicle dealership and land containing two roughly parallel water channels, the River Lea and the present equivalent of the medieval Chingford Mill leat. To the north-west of the site is undeveloped land, between the River Lea and the Chingford Mill leat, being used to store scrap metal and other waste. To the north of that land (and roughly north of the site) is the Water Turbine House of Chingford Mill Pumping Station, listed Grade II, (with a separate listing for its metal railings) apparently now in private ownership, as is a nearby former sluice operating building given a mock half-timbered appearance. These buildings, attractive heritage but poorly treated, are accessed by Lower Hall Lane, a pedestrian and cycle route across the Lea Valley connecting with the Lea Navigation Tow Path, also the Lea Valley Walk from the source of the River Lea near Luton to the River Thames at Trinity Buoy Wharf. To the north-east of the site are streets of two storey inter-war housing.

### GENERAL COMMENTS

The site is on the belt of land which used to be light industrial and is now mainly retail warehouses. The area is flat, the floodplain of the River Ching connecting with the floodplain of the River Lea. The sites would therefore require some kind of expensive provision to ensure the safety of residents in the event of excessive demand on the area drainage. Currently there is considerable air pollution and noise from the North Circular Road, which is elevated on this section as it rises to cross the Lea Navigation and to form the Cooks Ferry elevated junction with Harbet Road. If London was to see most vehicles powered by electric battery or hydrogen then it might be reasonable to plan high density housing, including over car parks and bus depots, but living on these sites would be unhealthy and unpleasant until air pollution was considerably reduced.

This site is particularly low lying, and intended to be flooded in an emergency (Risk Zone 3B).

### HERITAGE

A footpath and cycle track connects to Navigation footpath from Lower Hall Lane by taking a footpath beside North Circular. Water pumping Station, and to the North of the site from the eastern end of Lower Hall Lane.

## EFFECTS ON EPPING FOREST / LEA VALLEY

Green public open space might be accessed from the site :

by foot or bicycle westwards beside the North Circular, then Lower Hall Lane, to the Lea Navigation, about 15 minutes walk.

Epping Forest would be the most obvious green public open space that might be accessed by public transport from this site (bus route 444 to Chingford; bus route 34 to Walthamstow Central then Overground to Chingford).

Alternatively the Walthamstow Wetlands could be accessed by foot and bicycle along the Lea Navigation (see above) to Tottenham Hale, perhaps 40 minutes walk.

EFFECTS ON THE SKYLINE including effects on the skyline as seen from Epping Forest/ the Lea Valley

The site is on a line of sight with Edmonton waste incinerator and its tall chimney on the other side of the Lea Navigation. Epping Forest on the horizon to the north.

Buildings above a certain height, perhaps 10 storeys, will be visible not only from the open spaces of the Lea Valley, and so from the banks of Banbury Reservoir to which public access may be provided in future, as part of a chain of public amenity space, but also from the southern edge of Epping Forest high ground.

See comments on SITE SA47