

COMMENTS ON SOUTH LEYTON SITES AND WHIPPS CROSS SITE

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). Except for Temple Mills bus depot, 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’ Further 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.

SA02 (SA02): NEW SPITALFIELDS MARKET (2750 new dwellings)

1. The Council’s current Level 1 SFRA¹ speaks about “considering opportunities to reduce flood risk to existing communities and developments through better management of surface water, provision for conveyance and storage for flood water”.² Of these recommendations, of course “better management of surface water” will not deal with the risk of flooding from the Lea.
2. With regard to “provision for conveyance”, in terms of national policy (and indeed in terms of simple common sense) it is not acceptable simply to push flood water down the Lea and its canals into the Thames and into the built-up areas of Stratford and Leamouth. As Scott Wilson say

“It is considered unlikely that construction of new, large scale flood defence infrastructure provides a sustainable flood risk management approach for

¹ The key to references to flood risk documents is in the Civic Society’s submission on Matter 5, paragraph 2.

² Level 1 SFRA 1.1.1, on page 2 of the document.

Waltham Forest, as such measures can often relocate flooding problems to adjacent areas.”³

3. Thus, there is a need for additional low-lying land (kept lower than the built-up areas of Hackney and Leyton) where flood water can be “stored” rather than sent downriver. As the Level 1 SFRA says

“Consideration should also be given to strategic allocation of open space and preserving and expanding river corridors to create space for flooding to be managed effectively

“In particular, the following specific recommendations are made . . . Identify opportunities to create space for water through appropriate location, layout and design of development, in order to accommodate climate change and assist in managing future flood risk. This can be achieved by restoring floodplain . . . and by identifying, allocating and safeguarding open space for storage.”⁴

4. The New Spitalfields Market site is bounded on the north-west by the Old River Lea, the Dagenham Brook passes (in a culvert, at present) through the middle of the site – see the Level 2 SFRA, Appendix B, site SA06, under the heading “Summary”, and see also the plans at Figures 1-4 where the watercourse is shown passing through the site above and to the left of the notation “SA06” – and the site is bounded on the west by another watercourse (at present culverted), the Temple Mills Stream.
5. It is submitted that the Council should give proper consideration to “re-wilding” this site, or at least the part of it North of the Dagenham Brook, as low-lying marsh (which would include lowering the ground level on the site). With regard to “re-marshing” see the “Vision” set out in “Making Space for Water”

“The results of the strategy will be seen on the ground in the form of more flood . . . solutions working with natural processes. This will be achieved by making more space for water in the environment through, for example, appropriate use of realignment to widen river corridors . . . and of multi-functional wetlands that provide wildlife and recreational resource”⁵

and also, in the Council’s current Level 1 SFRA

“It is recommended that LB Waltham Forest take a holistic approach to flood risk management across the Borough within the wider context of the water cycle and local environment. Within Waltham Forest, the majority of waterbodies are designated as heavily modified . . . with an absence of natural river processes leading to lost habitat diversity and poor water quality.”⁶

³ Scott Wilson report, Executive Summary (page i), see also 5.4.3.

⁴ Level 1 SFRA, 7.1; the sentence following the passage quoted makes it absolutely clear that the Council’s SFRA is speaking about additional areas for flood storage, over and above existing flood storage areas. See also the final paragraph of the Level 1 SFRA “However, it is further recommended that policy options are expanded to include greater emphasis on floodplain management to complement flood defence infrastructure, by promoting appropriate use of the floodplain and making space for water” (Level 1 SFRA, 8.1, emphasis added).

⁵ “Making Space for Water”, under paragraph 2.2, on page 15 of the document.

⁶ Level 1 SFRA, 7.6

6. If, contrary to what I would wish to see, this site is not to be “re-marshed”, then I would comment as follows.

Effects on Lea Valley

7. Before this site is allocated for any development, there must be a full and detailed survey of the wildlife in the immediately adjacent area, that is, Hackney Marshes and the banks of the River Lea (which are Metropolitan Open Land). I trust that the Inspectors will be shown at least the bat survey and the Summary Report following biodiversity studies of the Waterworks Meadow (a site slightly upriver, about 800 yards north-west of the Spitalfields site) commissioned by Save Lea Marshes following crowdfunding. Any development on the Spitalfields site must be restricted by consideration of its impacts (in all ways – including by footfall from any residents on the site) on the wildlife as found by such a full and detailed survey of the immediately adjacent area.
8. Also, any residential development on this site must be restricted by the need to ensure that there is genuinely adequate green space within the site so that residents who simply want to sit out in a green space (as distinct from sitting on a balcony) will not swell the numbers using the marshes and the riverbanks.⁷
9. Any non-residential development on the site
 - must be such as will not generate large amounts of vehicular traffic (as, for instance, distribution warehouses would);
 - must not generate noise pollution on the marshes and the riverbanks, so that (for example) office uses, workshops for IT workers, and small retail units might be allowed but (for example) metal-bashing activities such as car repair must not be allowed on this site;
 - must not generate light pollution outside normal working hours to any extent greater than an ordinary dwelling house would.

Effects on skyline

10. I attach panoramas prepared by Architects for Social Housing (“ASH”) of the plans for this site prepared by Gort Scott for the Council (which I think may be the framework referred to at LPE30 5.6.3.2-4).



ASH_Leyton Mills
Spitalfields_Panoran

11. As is clearly illustrated by these panoramas, development on this site on the scale which LP2 would demand would have a disastrous effect on the skyline as seen not only from the East Marsh (viewpoint “Panorama 1”) but from the whole of Hackney Marsh (viewpoint “Panorama 2”). Any development on the Spitalfields site must be no

⁷ The Skyline Studies speak at 05.5.7 (page 114) of the Spitalfields site having “excellent access to green amenities”, which is a very euphemistic way of describing the likely effects on the Metropolitan Open Land and wildlife habitats of 2750 new homes on this site.

higher than four storeys on the side towards the Marsh and six storeys on the other side of the site.

SA01 (SA02): LEYTON MILLS (1950 new dwellings)

12. The supermarket use (at present, Asda) is valued by residents, and should be retained. It will need car parking in order to carry on its business. Supermarkets at which people are to buy a full week's load of groceries have to have space for customers to park the vehicles which they will need to carry the groceries home.
13. The use as a builder's merchant / DIY store (at present, B&Q) is also important locally. It is desirable that there be more than one substantial builder's merchant in South Waltham Forest, to prevent a local monopoly. (Otherwise, there will be large numbers of vans making trips along the North Circular to Barking or Beckton.) And it is not desirable that builders' merchants be located on a small site among residential streets as in the case of C&S in Grove Green Road. Also, builders' merchants need parking space to allow their customers to take away a load of building materials. It is definitely not desirable that the customers should have to park their vans on the street as happens at C&S.
14. Any residential development on this site would have to be adequately shielded from the A12, from the point of view of air quality as well as of noise.

Effect on Lea Valley

15. The proposed bridge from this site over the railway line would increase footfall in the Valley (with regard to which, please see paragraphs 7 and 8 above).

Effects on skyline (and setting of heritage assets)

16. The panoramas from Hackney Marsh generated by ASH illustrate buildings on this site with two (higher) storeys for retail/car parking plus (on top of the retail/car parking) six storeys (of an ordinary height) of residential. It appears from these panoramas that development to this height might not have a serious deleterious effect on the skyline as seen from the marshes. On the other hand, as is exemplified by the existing 20-storey tower on the corner of Orient Way and Ruckholt Road, any development on this site higher than 8 storeys is likely to have a serious effect on the marshes, which are Metropolitan Open Land. (The Skyline Studies include no view of this site from Hackney Marshes or the northern Olympic Park.) The "coherent skyline" proposed for this site, Bywaters, the Spitalfields site, and Temple Mills Bus Depot together (LPE30 5.6.7.4-8) would be a disaster for the Metropolitan Open Land.
17. The area to the north and east of this site comprises two-storey terraced housing, in which (as built by the Victorians) the buildings which stand out are the (former) Leyton Town Hall and the Library, the schools and the churches. The Council has not provided any view showing the effect that the tall buildings proposed for this site would have on the skyline as seen from the area, including from open spaces such as Coronation Gardens and St Patrick's Cemetery. Because the ground level of this site is slightly lower than the immediate neighbourhood, I hope that 8-storey buildings on this site might not have a great effect on the character of the neighbourhood. However, any development higher than 8 storeys is likely to cause substantial harm to the

character of the area, part of which is a Conservation Area, and which includes the setting of the Library and the former Town Hall, which are Listed buildings.⁸

SA03 (SA02) BYWATERS (aka AUCKLAND ROAD LSIS) (1250 new dwellings)

18. The site belongs partly to Thames Water and partly to Bywaters, and they have been in dispute about the redevelopment of the site, with Bywaters⁹ demanding that they should be free to redevelop their part separately, which would require substantial work to Thames Water's flood storage tanks, while Thames Water¹⁰ has insisted that they will not pay for work to their tanks.
19. It is desirable that there should be a civic amenity site (that is, a dump for residents to dispose of household items and large quantities of garden waste) in South Waltham Forest. Otherwise, law-abiding residents will be making longer journeys by car (to South Access Road, or to the Redbridge Council site north of Charlie Brown's roundabout) and also there will be an increase in fly-tipping. Use as a civic amenity site is very clearly a "bad neighbour" for residential development.
20. It may also be necessary that there be a base and offloading site for refuse trucks in South Waltham Forest, to avoid the trucks making long journeys (for instance, to Edmonton and back again). This use also is very clearly a "bad neighbour" for residential development.
21. From the point of view of flood risk (specifically, the management of flood water) it would be desirable that here (as well as on the Spitalfields site) the Dagenham Brook and Fillebrook be de-culverted, and also that the storm water tanks remain open, with the area around them available to be flooded and so providing additional space for flood water storage, rather than the storm tanks being placed underground as proposed in LPE30 5.6.3.5.

Effects on skyline

22. If there are to be any new buildings on the site, they must be no more than 8 storeys high for the reasons stated with regard to the Leyton Mills site.¹¹ (Once again, the Skyline Study (05.6) does not include any view from the marshes.)

EMERGING: TEMPLE MILLS BUS DEPOT (700 new dwellings)

23. This site is on the flood plain of the River Lea. It appears that the Council has added yet another site for large-scale residential development which is at high risk of flooding.

⁸ The Library is located on the corner of Ruckholt Road and the Leyton High Road, just over the northern edge of the "overview" plan in the Skyline Study (05.4) for this site, and it is not mentioned at all in the Skyline Study or in LP2 with regard to this site.

⁹ Waltham Forest Draft Local Plan (LP2) Draft Site Allocations Document (Reg 18) October 2020 Consultation Report Schedule of Comments, pages 107-108.

¹⁰ Waltham Forest Draft Local Plan (LP2) Draft Site Allocations Document (Reg 18) October 2020 Consultation Report Schedule of Comments, page 90.

¹¹ The Skyline Study (05.6.7) speaks of "maximising views across the green assets" – that is, we assume, over the River Lea and Hackney Marsh – but of course maximising views for the residents of tower blocks is also maximising the harmful effect of the tower blocks on the skyline as seen from the "green assets".

Effects on Lea Valley

24. As with the Spitalfields site, and for the same reasons, there must be a thorough survey of the wildlife on the marshes before any residential development is considered, and any residential development must have adequate green space within the development so that residents who want to sit out in a green space (rather than on a balcony) do not swell the numbers using the Marshes and the banks of the Old River Lea.

Effects on skyline

25. The Council says (LPE30 5.6.7.7) that the site is suitable for tall building(s). There are no skyline studies. The language the Council uses, in terms of the “potential to maximise opportunities for long-distance views across the Lea Valley Regional Park and Queen Elizabeth Olympic Park”, shows that the intended tower blocks would intrude on the skyline of the Lea Valley, and the language in terms of “a coherent skyline” indicates that the effect would be to increase the sense of enclosure in an urban environment so that the Lea Valley would feel like Central Park in New York.

SA17 (SA16): WHIPPS CROSS HOSPITAL (1500 new dwellings)

26. It appears that funding from Central Government for a new hospital building may at best be only such as to allow about half the planned building to be constructed, so that much of the existing hospital buildings would have to remain in use. Since work to redevelop the part of the Whipps Cross site currently allocated for new housing cannot begin unless and until the hospital functions have been moved out of the existing hospital buildings, it seems likely that the outline permission granted for housing on the Whipps Cross site may lapse. Therefore, what will be said in the Local Plan with regard to this site may yet be of practical importance for the area.
27. The new hospital building to be erected on the site of the former Nurses’ Home and laundry range should be low-rise (perhaps four or five storeys) so as to accommodate surgical wards “stacked” above operating theatres. (Indeed, it seems likely that because of limited funding from Central Government, only this much could be built within the next five years.)
28. If and when the rest of a new hospital can be built, it should have a much larger footprint than is presently planned and be surrounded by green space, so as to allow the patients in medical wards to have views out onto green space and permit a separate Margaret (palliative care) Centre with its own private gardens.
29. Substantial land should be retained for future NHS buildings as and when required.

Heritage and its setting

30. The 1903 buildings (except for the Chapel), which are locally listed, should be sympathetically converted for residential use.
31. Any land which is left over for redevelopment should be used for residential buildings to complement and support the 1903 buildings (and these should be no higher than the roofline of the 1903 ward blocks, which are a local landmark, visible across the valley of the Fillebrook).

Effect on Epping Forest

32. The total number of dwellings on the site should be limited and adequate green space within the site should be provided for residents in the new dwellings. This is necessary both for the residents' quality of life and to safeguard Epping Forest land. It is important that residents who simply want a green space to sit out in should not have to use Epping Forest land.¹²

Effect on the skyline

33. There must be no tall buildings which would intrude on the skyline from the open parts of Leyton Flats (that is, the Forest land between the Whipps Cross Road and Snaresbrook Road).

¹² See the concerns expressed by the Conservators of Epping Forest (Waltham Forest Draft Local Plan (LP2) Draft Site Allocations Document (Reg 18) October 2020 Consultation Report Schedule of Comments, pages 315-316). I think that these concerns are valid objections to what is proposed,, whether or not the Corporation of London continues to maintain these as objections to LP2.

Leyton Mills, New Spitalfields Market Site
Panorama locations map
27 January 2022

Panorama 2

Panorama 1

River Lea

Leyton

Leyton Mills, New Spitalfields Market Site
Panorama 1
Existing view
27 January 2022



Leyton Mills, New Spitalfields Market Site
Panorama 1
Proposed 4-6 storey blocks
27 January 2022



Leyton Mills, New Spitalfields Market Site
Panorama 1
Proposed 5-7 storey blocks
27 January 2022



Leyton Mills, New Spitalfields Market Site
Panorama 1
Proposed 4-6 storey and 5-7 storey block comparison
27 January 2022



Leyton Mills, New Spitalfields Market Site
Panorama 1
Proposed Gort Scott scheme
27 January 2022



Leyton Mills, New Spitalfields Market Site
Panorama 2
Existing view
27 January 2022



Leyton Mills, New Spitalfields Market Site
Panorama 2
Proposed 5-7 storey blocks
27 January 2022



Leyton Mills, New Spitalfields Market Site
Panorama 2
Proposed Gort Scott scheme
27 January 2022

