

## **COMMENTS ON SITES IN NORTH LEYTONSTONE**

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’ 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.

### ***SA18 (SA17): JOSEPH RAY ROAD (320 new dwellings)***

1. The Turkish supermarket included in this site serves a section of the community and appears well-used. It may need car parking in order to carry on its business.
2. It is necessary, or at least highly desirable for residents who may need to collect parcels addressed to them, that there should be a Royal Mail delivery office in Leytonstone, and the present site is reasonably convenient for the centre of Leytonstone.
3. The builders’ merchants’ yard has already given up the part of its premises which was south of the Overground line for housing. 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.

4. The railway arches abutting on the builders' merchants' yard are already in use as stores for building materials, and the other arches (apart from the one used to provide access from the entrance to the Overground station to the eastbound platform) are already in use (for purposes including a bar) with access from the south side of the Overground line.
5. It is desirable to provide step free access to the platforms of Leytonstone High Road station, but it might be better to think in terms of the approach being from the south side of the Overground line.
6. LPE30, 5.5.7.6 says that the site has a PTAL (public transport accessibility level) of 5-6a ("very good to excellent") but this figure will depend on the Barking to Gospel Oak Line, which does not itself go anywhere that is useful to many people. This line is mostly used to connect to the Victoria Line at Blackhorse Road and for PTAL purposes it should be considered in the same way as a bus route. LPE30 also says that the site is "close to" Leytonstone Underground Station, but from here to the tube station is three bus stops, or a good ten minutes' brisk walk.

### ***Effects on skyline***

7. The proposed tall building ("potential for height", LP2 page 64; in the Skyline Studies document page 137, 18-20 storeys) close behind the buildings in the High Road, would dwarf the buildings in the High Road and change the whole character of the area.

### ***SA19 (SA 19) CHURCH LANE CAR PARK (105 new dwellings)***

#### ***Effects on skyline and character of the area***

8. The proposed tall building ("potential for height", LP2 page 67; in the Skyline Studies document page 130, 10-12 storeys) close to the junction of Church Lane and Harrington Road would destroy the character of the centre of Leytonstone. At present, the tallest building, and the local landmark, is the tower of St John's Church.
9. The site should be developed in accordance with the character of the neighbourhood. Even a development three storeys high, in line with the frontages in Church Lane, would be higher than the immediately adjacent properties in Harrington and Vernon Roads. Anything higher than four storeys would be completely out of character.

### ***SA20 (SA 19) TESCO AND ADJOINING SITES (1100 new dwellings)***

10. The site boundary includes Tesco's store and its carpark, and also Macdonalds and its carpark, the building housing the undertakers, the buildings formerly housing the Star of India and Stone Pizza, the Welsh Church and its hall and minister's house ("manse"), and the blinds factory at the west corner of the site.
11. I note that it is proposed to retain the supermarket use. 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.
12. The Welsh Church Hall is used not only by a nursery during weekdays but by the Woodhouse Players (the local amateur dramatic society, which makes a significant contribution to the life of the area) and so its current use is of value to the wider community as well as to the Church's congregations.

### ***Heritage assets and their settings***

13. 883 High Road (the building housing the undertakers) is a late seventeenth-century building and apart from St Mary's Church Leyton it is the oldest surviving building in South Waltham Forest, and I understand that the interior is relatively unaltered.
14. The Welsh Church building, which is locally listed, is distinctive and the effect of the current position of the manse to one side and of the hall to the other side is to allow the sides of the building to be seen.
15. The pharmacy/ "health and beauty" department of Tesco's is the former Hall of the Bethnal Green Industrial Schools. Internally, it is a quite striking building -- the current Pevsner for East London speaks of "The imposing HALL of the industrial schools, with good timber roof"<sup>1</sup> – and it certainly deserves to be retained (and, despite its present use as part of the supermarket, it has "curtilage" protection under the statutory Listing of Leytonstone House in the same way as the rest of the Victorian buildings on the Leytonstone House site).
16. The remainder of the supermarket was built so as to harmonise with the retained buildings of the Bethnal Green Schools, and for this reason is low-rise, and any replacement buildings on the area now occupied by the supermarket itself must similarly be in keeping with the Victorian buildings and low-rise.
17. The tall buildings proposed for this site would interfere massively with the setting of Leytonstone House, which is a Listed building. (See, in the Skyline Studies document, illustrative key view 08 on page 127; the building at the right of this view, with the wireframe tower block stretching up past the top of the view above it, is the Listed Leytonstone House itself.)
18. The proposed tall buildings would also interfere with the setting of Carlton House on Aylmer Road and of St John's Church, which are Listed buildings, and of the Browning Road conservation area. (Illustrative key view 09 in the Skyline Studies is taken from close to the High Road end of Browning Road, and the impact is likely to be much greater from the middle of the conservation area, or the far end.)

### ***Effect on Epping Forest***

19. If there are to be residential buildings on the site of the present supermarket and on the High Road and Gainsborough Road frontages and the site of the blinds factory, the space in between these residential buildings must be left as green space for the use of the residents. This is necessary both for their quality of life and to safeguard Epping Forest land. It is important that residents who simply want a green space to sit out in the sun should not have to use Epping Forest land.<sup>2</sup>

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<sup>1</sup> Bridget Cherry, Charles O'Brien and Nikolaus Pevsner *The Buildings of England: London 5, East* (New Haven: Yale University Press, 2005), page 740.

<sup>2</sup> 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.

### ***Effect on skyline and character of the area***

20. What may be built by way of redevelopment of the remainder of the High Road and Gainsborough Road frontage and the High Road frontage, apart from 883 and the Church, should be in keeping with the parade on the east side of the High Road opposite Macdonalds and with the Walnut Tree which is across Gainsborough Road from the site, and also ought to be no higher than those. If higher buildings are absolutely necessary they should still be in sympathy with the frontages opposite them, and must be no higher than six storeys.
21. In addition to what I have said in paragraph 17 and 18 above, the proposed tall buildings ("potential for height", LP2 page 71; in the Skyline Studies document page 123, 18-28 storeys and 18-24 storeys):--
  - would intrude on the skyline as seen from the Epping Forest land north of Whipps Cross Road / Bush Road and from Wanstead Flats;
  - would also be visible from, and alter the character of, most of Upper Leytonstone, including the Bushwood area and even more the area on the west side of the Central Line/A12, because the ground on that side is lower (Leytonstone as a whole slopes upwards from south to north, and Tesco's is at the top of this slope).

The skyline and the character of the area were improved when the Council replaced John Drinkwater Tower with the low-rise John Drinkwater Close.

### ***SA21 (SA 20) MATALAN, LEYTONSTONE (190 new dwellings)***

22. The boundary of the site as drawn appears to include the car parking belonging to the flats in Nexus Court. It would not be proper to expropriate this parking, when people would have bought flats in good faith on the basis that there would be parking places attached to the flats.
23. Matalan's shop itself appears to be well-used. Matalan and Argos may be the only retail premises in the town centre of Leytonstone which are likely to attract shoppers from outside the immediate local area, and so may be the only premises which have the potential to provide footfall for other shops in the centre of Leytonstone. The business of Matalan's shop is likely to depend on having car parking for customers, but at present there appears to be adequate car parking space under the shop itself. If the shop building is to be demolished and replaced, this parking may need to be replaced also.

### ***Effect on Epping Forest***

24. Any development of the part of the present open-air car park not belonging to Nexus Court must include adequate green space for its residents and also the residents of Nexus Court (who at the moment have no green space reasonably available to them).

### ***Heritage and its setting***

25. It would be destructive of the setting of the tower and south front of St John's Church, which is a Listed building, and of the character of the whole of the centre of Leytonstone, to have a tower block looming above the Church.

***Effects on skyline and character of the area***

26. Any further development on the car park should be in keeping with the existing building of Nexus Court and no higher than Nexus Court.
27. Any replacement building on the site of the current Matalan store should be in keeping with the frontage opposite in the High Road, no higher than the frontage opposite in the High Road, and no higher than the nave roof of St John's Church.
28. The proposed tall building ("potential for height", LP2 page 74; in the Skyline Studies document page 123, 14 storeys) would intrude on the skyline from Epping Forest land at Leyton Flats and Wanstead Flats. It would also be visible from, and alter the character of, most of Upper Leytonstone, including the Bushwood area and even more the area on the west side of the Central Line/A12, because the ground on that side is lower.