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Dear Ms Copsey,

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

You confirmed to me, in an email of 9th January , that I may I may respond to the focused points raised. The reference of my first consultation response was Comment 459 made on the Draft Regulation 18 Version of the Local Plan on 29/09/2019.

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	Effects of setting on HERITAGE	PTAL Levels and Actual Public Transport Accessibility Levels	Effect on EPPING FOREST and LEA VALLEY	Effect on SKYLINE
SA 11 (SA 10) Leyton Leisure Lagoon & Leisure Centre E10 5AB	Swimming and fitness facilities well used, which means that if it is replaced, as suggested by the Council, housing will have to be added on top, adding to the height. Also, is chlorine storage close to housing safe?	This is opposite a Victorian pub and close to the Bakers Arms Conservation area ¹ . The largely Victorian heritage of the area should be respected.	TfL state level 4-5, NOT 5-6 as recorded by the Council. Separately, in actuality the only station within walking distance is Leyton Midland of the Barking and Gospel Oak line, a peripheral route rather than a commuter route.	This is equidistant from the Hollow Ponds and Walthamstow Marshes areas, both of which already have high pressure on them.	The Council suggest this has potential for height. This would have a deleterious effect on the skyline from the Grade II listed London Master Bakers' Benevolent Institution ² (also known as the Bakers Almshouses).
SA 12 (SA 11) Tesco Bakers Arms E10 7AA	A large supermarket at the moment Close to terraced housing in Bromley Road. Car park important to the economy of the Bakers arms shopping centre.	This site immediately abuts the Bakers Arms Conservation Area ¹ Opposite the locally listed King William IV pub ³ Next to Grade II listed 18C house ⁴ .	TfL PTAL level of 5-6, but this is bus routes only. See comment about rail routes above.	A potential extra 200 households from this site would put pressure on Hollow Ponds and the Marshes.	The Councils states potential for height here, which would ruin the skyline from the magnificent Bakers Almshouses ²
SA 13 (SA12) Stanley Road Car Park E10 7FF	. Car park important to the economy of the Bakers Arms shopping centre.	Immediately adjoining the Bakers Almshouses which are Grade II listed. Character must be respected.	PTAL level of 5, but this probably depends on the Barking Line. Actual accessibility by public transport is likely to be quite low, especially as this is further away from the Leyton Midland station.	Although a small site (50 homes) this will add further pressure to green spaces above.	Although "height" not proposed, this will impact on the setting of the Almshouses next door.

SA15 (SA 14) Leyton Bus Depot E10 6AD	A new bus depot would be needed before this one could be demolished. Whipps Cross Hospital development will increase the need for more bus services, not fewer.	This site backs on to the terraces of solid Edwardian and Victorian houses.	PTAL level of 5 but this probably depends on the Barking Line. Actual accessibility by public transport is likely to be quite low. A fair walk to the east-west bus routes.	Again, high density -225 minimum homes – would put pressure on the Hollow Ponds and Marshes.	Another site with potential for height, according to the Council. Opposite an 11-storey tower block, which is already inappropriate in this setting and should not set a precedent.
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SITE	GENERAL COMMENTS	Effects of setting on HERITAGE	PTAL Levels and Actual Public Transport Accessibility Levels	Effect on EPPING FOREST and LEA VALLEY	Effect on SKYLINE
SA 50 (SA SA 49) Sainsburys Hall Lane E4 8HH	Would need the shopping facility to be retained, and also some parking for shoppers. Which means that the resulting flats would have to be bulky, even if they're not "height" Not close to rail station and backs onto low rise housing.	The back of this development would abut 1930s terraces which give this part of south Chingford its suburban character, very different from the rest of the borough.	PTAL 3, with long bus rides north-south and east-west to any further interchanges. No public transport access at all to the nearest station, Highams Park.	Nearest space is Larks Wood (part of Epping Forest) which is heavily used and already has eroded paths.	The skyline of this area of predominantly low-rise houses would be impacted by anything over 4 storeys.
SA 51 (SA 50) South Chingford Library E4	A very small site which at the moment provides open space. The library was a useful resource for local schools, and Council say they would re-provision community use, which makes the site even more cramped, unless it goes inappropriately tall.	Next to an attractive estate of 1930s and 1940s houses. Very much an outer suburb site.	PTAL 2 -3, with buses only and a long ride to any further access.	A tiny site, so not much potential for open space for 15 homes proposed. Future residents would need to access Epping Forest, as above.	The skyline of this area of predominantly 2 -storey houses would be impacted by anything over 4 storeys.
SA 52 (SA 51) Albert Corner Old Church Road E4 6SJ	On the edge of a large estate of 1930s housing, very much an outer suburb.	As above. But this one would be much larger and bulkier as it would need the retail as well.	PTAL 3. Buses only, as above.	New residents seeking open space would probably access Larks wood to the East, already heavily used.	Tall buildings would be completely out of character.
SITE	GENERAL COMMENTS	Effects of setting on HERITAGE	PTAL Levels and Actual Public Transport Accessibility Levels	Effect on EPPING FOREST and LEA VALLEY	Effect on SKYLINE

<p>SA 72 (SA 69) Blackhorse Lane</p>	<p>SIL 3 Recent planning application submitted for Phase 1 of this huge development which is in 3 phases over a number of years.</p>	<p>Surrounded on the east side by Victorian terraces and attractive Warner houses.</p>	<p>PTAL 3-4. Tube and Barking line close by but bus access limited. Over 2000 commuters adding to the trains at this site will cause over-crowding as many people access the Victoria line here from buses and the Barking line but they all have to funnel into the Victoria line, as there are no commuter interchanges to relieve the pressure.</p>	<p>2300 homes proposed here. No parks within 15 minutes' walk, so the only open space is the Lea Valley and Walthamstow Wetlands in particular, which is already heavily used.</p>	<p>38 storey tower blocks are proposed here, overlooking the Lea Valley. Will damage the view from the Valley and will create a built corridor matching or exceeding the developments at Tottenham Hale. Buildings of this height will impact the nearby Leucha Rd and St James conservation areas.</p>
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1. "The Bakers Arms Conservation Area is a historically important local centre that contains good quality Victorian, Edwardian, and early-twentieth century architecture, primarily commercial buildings, but also the residential Master Baker's Almshouses, listed at Grade II. It has special interest as an example of a largely intact and coherent Victorian/Edwardian commercial centre within the London Borough of Waltham Forest, with buildings similar in style, size, and age. Shopfront improvements within the conservation area have helped accentuate the quality and value of some of the buildings, notably the parade of shops on Lea Bridge Road, at the centre of the conservation area." (BAKERS ARMS TOWN CENTRE CONSERVATION AREA APPRAISAL AND MANAGEMENT PLAN 2019)
2. "The high point is the London Master Bakers' Institution by T.E. Knightley 1857-66, a splendid display, buildings on three sides of a large railed court open to the street and extending along Lea Bridge Road to E and W. ...full of quirky detail... reliefs of ploughing and breadmaking on the side ranges..." (Cherry, B, O'Brien, C. & Pevsner, N. London 5 East, 2005)
3. "A prominent and highly decorative corner pub erected in 1896 to designs by architects W G Shoebridge & Lewis for Mr Charles Ford, replacing an earlier building. Original billiard room to rear still survives.". (Waltham Forest Local Heritage List, March 2020).
4. Early C18 house, altered. Brown brick in Flemish bond with red brick dressings; plain tile roof. 2-storeys with attic, 4 bays. (Historic England, list entry 1065572)