

## **MATTER 6 – TALL BUILDINGS**

1. We understand that if LP1, modified as the Council now proposes, is approved then it will finally determine the locations which will be deemed to be acceptable for tall buildings. Therefore, we call upon the Inspectors to give due, separate, consideration to the planning objections to tall buildings in each location proposed, and we hope that the Inspectors will allow sufficient time (which must be a matter at least of hours, not minutes) for separate discussion of each individual location.

### **Q 6.1**

2. The approach to tall buildings is not justified.
3. We agree with the wording of LPE30 3.5.1.1 but we disagree profoundly with the approach which the Council is expressing by using these words. Land should be used as efficiently as possible whilst making sure that development is appropriate to its surroundings. The constraint that development must not be inappropriate to its surroundings must set a limit to how efficiently the land can be used.
4. The Inspectors should completely reject the Council’s language in terms of “warranting a landmark presence on the skyline to aid wayfaring and navigation”.<sup>1</sup> It seems that the Council’s copywriters do not live in the era of satnavs and Google Maps, possibly not even in the era of the London A-Z. The residents of Waltham Forest have no need of further intrusions on their skyline.
5. Further with regard to the Council’s language, the Inspectors should reject the idea that tall buildings can “enhance the skyline”<sup>2</sup>, unless perhaps in an area such as Canary Wharf where there are already tall buildings and they are not being scattered higgledy-piggledy as sites happen to become available but form parts of a thought-out design for an area.
6. The Inspectors should also reject the idea that tall buildings create a “sense of arrival”: a sense of arrival is created by buildings of, at most, four or five storeys which one can see without craning one’s neck back. The Piazza del Popolo in Rome, or the Piazza Unità d’Italia in Trieste, would not be improved by adding a skyscraper or two.
7. As for the language in (for example) LPE30 5.2.7.3, second and third bullets, the Council is in effect saying that enhancing the high street frontages and the small grassed area that remains of Leyton Green is a justification for spoiling the townscape and landscape you have just enhanced by putting up a few tower blocks.

### **Q 6.2 – WITH REGARD TO POLICY 8**

8. In Policy 8, we invite the Inspectors to accept the language of the words before (A) and of (A), but to reject the approach which the Council is expressing. In particular, with regard to (B), the fact that a place is in a town centre (“Designated Centre”) is not a reason for destroying its character; major routes should be allowed to keep their distinctive characters and the settings of their listed buildings and conservation areas; with regard to arrival points we repeat what we said in paragraph 6 just above; and as

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<sup>1</sup> For instance (two among very many instances) LPE30 5.1.7.3, second bullet, and 5.2.7.3, first bullet.

<sup>2</sup> For instance, LPE30 5.2.7.3.

we have said the Council's choice of "strategic locations" is not something separate from its decision to allow inappropriate development, and so using the label "strategic location" as a justification for development is begging the question whether the development is appropriate. With regard to (C) "fragmented urban grain" is a euphemistic way of saying that if an area has been affected by bombing followed by insensitive reconstruction that is a justification for destroying the character of the area.

### **Q 6.3 FIRST QUESTION**

9. With respect, we do not understand the words "at a strategic level". Either the sites/locations are appropriate and justified by the evidence, or they are not. We submit that the majority of the locations proposed for tall buildings are not appropriate, for the general reasons we stated in paragraphs 7-12 of our submission on Matter 3 and the specific reasons in relation to particular sites stated by Mr Boote, Mr Gilbert, Ms Munday, Mr Stannard, Ms Sterland, and Ms Weiss, and the writer.
10. However, we accept that the position is different in the area around Walthamstow Central station, where the number of higgledy-piggledy tall buildings is already such that there would be little point in preventing further tall buildings. In this area what matters is:
  - That there should be a single clear and unified design for the area, including the heights of buildings, as at Canary Wharf;
  - That the tall buildings should not be allowed to intrude on the settings of listed buildings in the area such as Walthamstow Central Library or on what remains of the character of Walthamstow High Street, or on the St James conservation area (West of the High Street);
  - That the tall buildings should not spoil the settings of the listed buildings in the Walthamstow Village conservation area (up the hill east of the High Street), or in the Orford Road conservation area;
  - That no further tall buildings should be so high as to intrude into the skyline as seen from the Lea Valley or from open land belonging to Epping Forest.
11. Separately, part of the Council's justification of locations for tall buildings has been the PTAL of the location – which is not a justification for a tall building as such, but might justify the placing of a large number of residents in a "car-free" development in a location. We refer to the comments on the Council's treatment of PTAL's in paragraphs 19-21 of our submission on Matter 3.

### **Q 6.3 SECOND QUESTION**

12. We believe the Skyline Studies have not in any way informed the choice of sites/locations. Rather, the sites/locations were chosen for a completely different reason (they were put forward by landowners or developers in the Council's canvass for sites) and the Skyline Studies were prepared after the sites/locations were chosen,<sup>3</sup> and were prepared in such a way as to minimise the apparent effect of the tall buildings proposed:

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<sup>3</sup> This is demonstrated by the fact that the Council has added four sites for tall buildings (LPE30, 3.5.4.5) but has not found it necessary to prepare any skyline studies in respect of these four sites.

- The use of images from Google Earth (which Google obtained by driving cars with cameras along roads) has meant that there are hardly any views from open spaces.
- The images used are mostly from close to the sites/locations, where trees or quite low buildings may hide tall buildings from view, rather than from further away, where the tall buildings proposed would intrude into the skyline.
- The images used appear mostly to be taken when the trees are in full leaf, rather than showing the effect in winter and spring.
- The way in which the proposed tall buildings are represented by “wire” outlines rather than by solid blocks gives a false impression of what the visual effect of the proposed buildings would be.

The true effect of one part of what is proposed is demonstrated by the images prepared by Architects for Social Housing of the proposals prepared for the Council by Gort Scott for the Spitalfields Market and Leyton Mills sites, as seen from Hackney Marsh.



ASH\_Leyton Mills  
Spitalfields\_Panoran

#### **Q 6.5**

13. So-called “high quality” design is no excuse for allowing tall buildings where they are not appropriate.
14. With regard to Policy 56, we support the language at (B), (C), (D) and (E). In relation to (E) we would add that where the character of an area is for parades to be clearly divided into vertical units, this also should be respected. With regard to (F), we would question the words after “respects its context”, which would easily become an excuse for designs which are entirely inappropriate to the context.
15. It is for the Council to say how they would implement these parts of Policy 56; our experience of the Council’s practice up to now suggests that all this fine language would receive only lip service. What is said at LP1 14.4 would be more credible if the Council were to give examples of bad design which it has approved in recent years, and were to pledge not to allow similar design in the future.

#### **Q 6.6 – FIRST QUESTION**

16. No, for the reasons given above.

#### **Q 6.6 – SECOND QUESTION**

17. Among the main modifications required are:
  - Tall buildings will not be allowed where they would intrude on the skyline of Epping Forest land, or of the Lower Lea Valley;
  - Tall buildings will not be allowed where they would substantially affect the settings of listed buildings or conservation areas;

## WFCS

- Tall buildings will not be allowed where they would be out of character with (to quote Policy 56) sites/areas of robust and desirable character
- and, to prevent evasion, the Local Plan should include a list of all the areas with robust and desirable character where tall buildings would not be allowed.

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

