

Waltham Forest Civic Society

Response to Revised Local Plan August 2023

Waltham Forest Civic Society (“WFCS”) is a voluntary association with very limited resources of time and energy. We put a tremendous effort into preparing for the Hearings which took place in March 2023, working through the Council’s massive documents and writing full and detailed responses to them. We believed, and continue to believe, that we demonstrated that the documentation was inadequate – to give just two examples, the flood risk appraisal was not in accordance with the up to date Planning Policy Guidance, and the Suitable Alternative Natural Greenspace Strategy measured the distance from a proposed development to a suggested green space on a map, without any regard to how far it would be to walk along the streets or whether the route would go up steep hills. None of the Council’s documents could provide genuine support to the Council’s proposed housing target of 27,000 new dwellings per year, and in particular the Council could not satisfy the legal requirement that there be no reasonable scientific doubt as to whether the proposed level of development would lead to damage to the Special Area of Conservation in Epping Forest.

As it appears, the Inspectors have decided to recommend approval of this high housing target with the extent of development it will involve. We are, frankly, shocked by this and by the apparent willingness to accept inadequate documents and give only lip service to legal requirements. Of course, we have not seen the Inspectors’ report and so we do not know their reasoning, but we find it very hard to believe anything other than that the Inspectors, who are civil servants, have been instructed to approve high housing targets in London (perhaps particularly, in areas which do not have Conservative MP’s) regardless of all other planning considerations and all legal requirements.

We would not have been able to devote the same effort as we did before the March 2023 Hearings, even if we had still thought that there would be any purpose in taking apart the Council’s submissions and demonstrating their inadequacies.

We are not to be taken as accepting any part of what the Council is putting forward, and we wish to reserve the right to object in any way we can to each and every part of the Revised Local Plan.

We still believe the higher target of 27,000 new dwellings ~~over the plan period per year~~ will not go any way to dealing with the shortage of affordable homes, (where the record of Waltham Forest Council has been poor), still less homes for social rent, which are put forward by the Council as a justification for their housing target.

27,000 new dwellings ~~per year~~ will create overcrowding, congestion on the streets and difficulty accessing medical and educational services, and also building of new homes in areas of high flood risk or inadequate drainage. A raft of issues the council will not have the funding to deal with will be the result. This higher housing target will also create the need for taller buildings and all the issues they create, including isolation, safety and lack of communities. The target needs to be lower and more vigour applied to build homes for social rent, including actual council homes.

We will concentrate the limited effort we can give at this time on the issue of tall buildings. As Robert Gay said at the Hearings in March, this is the aspect of the Council’s draft Plan which most concerns our membership. It also concerns many others, as witnessed by the unease which has been expressed by residents in social media and elsewhere since they have seen the lift shaft for the tower above the Mall in central Walthamstow rising up.

Starting with Policy 56 – High Quality Design – what does that mean?

POLICY 56 DELIVERING HIGH-QUALITY DESIGN

Strategic Objective

Promote exemplary standards of design and place-making, and deliver the highest quality of development.

This is meaningless as it will be interpreted so as to allow absolutely any development the Council wishes to approve. Residents were told Walthamstow Town Centre would “deliver the highest quality of development”, but it is a poorly designed scheme purely for monetising the council’s assets.

E. Reinforce and/or enhance local character and distinctiveness, taking into account existing patterns of development, townscape, skyline, urban form and grain, building typologies, architecture, materials, trees and landscaping and other features of local and historical significance;

F. Respond appropriately to their context in terms of scale, height, and massing;

G. Achieve exemplar quality of design, and architecture and landscaping that respects its context whilst encouraging innovation and not unduly restricting style;

This is again dreamworld stuff. There are many examples in the Borough where tall buildings have been constructed beside 2 storey Victorian terraces. No attempt has been made to “Reinforce and /or enhance local character and distinctiveness”.

Now, tower blocks en masse are being proposed for the Whipps Cross site and Leyton Mills both of which have on one side Victorian housing and on the other side valued open space. To say nothing of the Spitalfields site adjacent to the Old River Lea and in the flood plain. No attempt is being made to respond to the context in terms of townscape and skyline.

The tall buildings by the junction of Ruckholt Road and Orient Way, and the buildings now going up next to them on the skyline, show the effect of a solid fence along the whole edge of the Lea Valley which the developments proposed would have. (It is not only the members of WFCS who are concerned about tall buildings looming over open spaces such as the Lea Valley and the Epping Forest land by Whipps Cross: the latest edition of the Pevsner Architectural Guide for East London comments on Well Street Common in Hackney that it is “one of the few green areas in East London where there are no adjacent towers of flats to diminish the sense of space”.)

And what is “*exemplar quality of design*”? – in terms of architectural quality, nothing much down Blackhorse Lane comes anywhere near. The only place that comes to mind is the Motion development in Lea Bridge Road, but that fails as it does not “respect its context”.

This Policy will be completely ineffective unless the words used are given clear meanings by way of examples of types of development which would **not** be allowed. Otherwise, going by the previous Local Plan and current developments, each site will be decided purely on the monetising of the site by the council and developer. Not about creating pleasant communities to live in, or a pleasing skyline, or buildings which are pleasant to look at (what Michael Gove would call “beauty”).

POLICY 57 TALL BUILDINGS

In what follows we will compare the latest amended wording of the Local Plan, published in August 2023, with some current developments which have actually been approved under the aegis of the draft Local Plan as “emerging policy” or which are being proposed with the Council’s support (in the case of the Church Lane Car park in Leytonstone, proposed by a company 100% owned by the Council itself). This will show that the Council’s single-minded pursuit of its housing target involves disregarding all the other planning considerations stated in this Policy. So long as the Council continues with this attitude, the planning considerations stated in this Policy will be just fine words, with no practical effect.

Tall Buildings Assessment (Revised Local Plan)

- i. *Impact on the existing character and townscape of their surroundings considered in long-range, mid-range and immediate views;*

Walthamstow Town Centre – for views from all ranges a 34 and a 27 storey tower block are totally out of keeping with the Victorian Town Centre and with the skyline as seen, for example, from Walthamstow Village and from the Wetlands in the Lea Valley. On this basis it would never comply.

Church Lane Car Park, Leytonstone – 14 storey tower blocks are totally out of keeping with the Victorian Town Centre and on this basis would not comply.

Lea Bridge Station – The current Motion development sets a precedent, but is well out of keeping from the urban Victorian neighbours or the open spaces of the Lea Valley. The proposed 3 new blocks around the station will simply continue to undermine the open character of the area.

Whipps Cross Hospital Site – The current outline permission granted will allow 18 storey blocks. Hopefully when full planning permission is sought this will be rejected as it is not a site for higher and higher buildings due to its location away from good public transport and next to 2 storey Victorian/Edwardian housing, to the 1903 hospital buildings (which are locally listed), and to Epping Forest land.

- ii. *Impact on the existing streetscape, including the provision of active frontages and sufficient, high quality public realm at ground level;*

Walthamstow Town Centre – The tower blocks do not create a high quality public realm as is becoming obvious now the basic structure is being constructed. There is no space for it as the towers are virtually up against the pavement and the shopping centre so on this basis it does not comply.

Church Lane Car Park, Leytonstone – the proposed tower blocks squashed in against the Victorian housing and the Central Line do not create an active frontage and there is no space for high quality realm.

Lea Bridge Station – Currently there is very good public realm with a very popular pocket park. There is an active frontage as the area is open grassland and the railway can be viewed from the pavements. The 3 proposed towers will destroy the current successful public realm so this fails the test dramatically.

Whipps Cross Hospital Site – the outline permission is for a scheme that does pass this test. But it is vital ways are found of ensuring the public realm is properly managed and an asset to the development over the following decades.

- iii. *Impact on the existing, and where relevant emerging, skyline;*

Walthamstow Town Centre – two tower blocks over twice the height of any adjacent tower blocks has a major impact on the street scene and, as is now apparent, can be seen from miles around. Totally out of keeping with the existing skyline and therefore fails this test.

Church Lane Car Park, Leytonstone – the proposed tower blocks loom over the current skyline and will have a major impact. As this is the first of many proposed developments in Leytonstone it will set the standard for the new skyline. Clearly this fails this test.

Lea Bridge Station – The impact of these tower blocks will be enormous on the skyline as they are adjacent to the flood plain which is flat land. In addition they will spoil the view from

the Lea Valley making the valley less attractive as open space. Clearly this development dramatically fails the test.

Whipps Cross Hospital Site – The outline permission fails this test as the proposed tower blocks of flats are even higher than the intended 10 storey hospital so towering over the hospital and Epping Forest and the surrounding roads. The impact on the forest views will be significant and lower heights are needed for the housing to pass this test.

- iv. *Contribution to existing and proposed spatial networks and hierarchies, wayfinding, and legibility;*

Walthamstow Town Centre – stands out like a sore thumb as it is so high. Clearly passes this test which just encourages eyesores!

Church Lane Car Park, Leytonstone – the Church Lane car park site used to be Grove Green Road until the underpass was filled in. It is not a destination or a site worthy of wayfinding or legibility so this proposed development fails this test.

Lea Bridge Station – there is no benefit in regarding this as a wayfinding or legibility site. It is obvious this is the boundary between the more rural Lea Valley and the urban environment. The proposed development just creates an eyesore between the two areas. It does nothing to justify the unnecessary high buildings.

Whipps Cross Hospital Site – the hospital will have its own signage so will be very legible. The rest of the site will need to be properly signed, but not by building tower blocks which create their own hierarchy. The residential blocks need to be subservient to the hospital.

- v. *Impact on heritage assets, their settings, and views to and from them including the background zones of views identified in the London View Management Framework (LVMF) ⁽⁴¹⁾; and*

Walthamstow Town Centre – Because it is excessively high any historic buildings such as the Listed Central Library's context as a key building in the Town Centre is seriously undermined and downgraded. It completely fails this test.

Church Lane Car Park, Leytonstone – Because the new blocks will be excessively high the context of any historic buildings, such as St. John’s Church which at present is the landmark in Leytonstone Town Centre (and is Listed), is seriously undermined and downgraded. It completely fails this test.

Lea Bridge Station – the tall buildings do not enhance the setting of the railway which is the main historic asset of the area. It fails this test.

Whipps Cross Hospital Site – Some of the 100+ year old historic buildings will be retained and the settings for them need to be enhanced so that they become a feature of the whole site.

- vi. *Exemplar quality of architecture and design with careful attention paid to form and proportionality, materials, finishes, and details;*

Walthamstow Town Centre – The excessively high, bog standard tower blocks show no architectural quality or imagination. Just another block of flats dropped into a town centre. To make it worse it only has one staircase and will be clad, showing the lessons from Grenfell have not been learnt. Totally fails this test.

Church Lane Car Park, Leytonstone – Again just normal bog standard tower blocks dropped into a very congested site with no understanding or recognition of its surroundings. Clearly fails this test.

Lea Bridge Station – The Motion development close by does pass this test, but it is very rare in Waltham Forest for any building to be of architectural merit. Once again the 3 proposed blocks are just boring high rise towers dropped into an unsuitable site with no attention paid to form and proportionality. Will also damage the view from the Motion. Clearly fails this test.

Whipps Cross Hospital Site - This is where “*exemplary architecture*” is vital if this development is to be an attractive place to live. The outline permission is not for a scheme that will pass this test as the blocks of flats are just bland 18 storey boring blocks with no understanding of the importance

of the site. Currently the proposed development is just about monetizing the site to help pay for the new Hospital. It is also important that a self-contained Hospice with space for its own gardens is built and designed to integrate into the community that hopefully may emerge.

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on behalf of Waltham Forest Civic Society