



**Regeneration and Growth Directorate
Economic Growth & Housing Delivery**

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Mr. Stewart Murray
Strategic Director
Waltham Forest Council
The Magistrates
1 Farnan Avenue, London
Town Hall Complex
London E17 4NX

10th November, 2020

Dear Mr. Murray,

Re: Objection to Planning Application ID 203040 – 480 to 510 Larkshall Road

We note that an application has been submitted by Atlantis Highams Ltd for demolition of the existing buildings at 480 to 510 Larkshall Road. The proposal is to replace the existing buildings with a 5-6 storey residential-led, mixed use development comprising 68 residential dwellings (Use Class C3), flexible commercial spaces (Use Class E), a community facility (Use Class E/F.1) and a new public train station entrance as well as other public realm improvements, landscaping, private and communal amenity spaces, children's play space, waste and refuse facilities, secure cycle storage facilities, public cycle hub, accessible car parking and other associated works.

The Highams Park Planning Group (HPPG) supports appropriate development in the Highams Park Plan Area including the principle of this site being redeveloped. However, we consider this proposal to be an overdevelopment of this site and this letter lays out our objections to this planning application and we hereby request the Council to decline this application.

We accept that many parts of the application are compliant with the policies in the Highams Park Neighbourhood Plan. However, there are several important aspects where this application is non-compliant with policies as detailed below.

The Highams Park Neighbourhood Plan (HP Plan)

This application does not comply with the requirements of **POLICY CDP2: Character & Design** of the HP Plan which states:

“9.4. POLICY CDP2: Character & Design

9.5. Development shall be of high-quality design and should complement the existing character and appearance of the Area. In all development there shall be a presumption in favour of preserving the distinct character and appearance of the Area, as well as the views across it. “

In particular, this application fails to satisfy the first, third and fourth bullet points of **Paragraph 9.6.** as per the extract below:

“9.6. This shall be achieved by development:

- *Positively contributing to the character of existing buildings and taking into account the predominant local character, setting and any distinctive building design features as described in the relevant Character Assessment (as per **Appendix 3**) for the area in which the development is located.*



New development proposals should actively demonstrate how proposals have taken into account and been informed by the local character context with reference to the context explanation in paragraph 9.9.

- *Having regard to the form, materials, scale, height, mass, orientation, pattern and grain of **surrounding buildings, streets and spaces.***
- *Respecting the building lines and the predominant character of the road in which the property is located."*

And, paragraph 9.9 of the HP Plan which states:

"9.9. Many parts of the Plan Area have a clear architectural heritage – with an attractive character and a distinct local identity. These positive features need to be protected and preserved. New developments in such areas need to fit in rather than stand out."

The development proposed will do just the opposite of what the above policy stipulates as it will dominate the adjacent Highams Park Station which is a distinctive and defining feature of the character of Highams Park District Centre; this will be particularly damaging to the character of Highams Park District Centre as a whole, especially when viewed from The Avenue and from Hale End Road.

Paragraphs 6.118 and 6.119 of the accompanying Planning Statement make references to the nearby Signal Box and the Regal building but make no reference to the immediately adjacent and historic Highams Park Station building. This totally disregards Character Assessment 9 (copy attached) which defines the station building as the main feature and focal point of the town centre, as per the following extracts:

"LAYOUT AND STREET FEATURES

The main feature of the area is the railway station, with the re-purposed signal box (build 1925), together with the active feature provided by the level crossing (fig 1). The retail lined roads radiating out from the rail crossing create a "marketplace" feel to the area (fig 2). The Millennium Clock and new landscape features in Signal Walk reinforce the area's role as the "town centre".

The modest scale of buildings allows a constant backdrop of mature trees as a key character aspect of the area, complemented by well-established street trees viewed along the radiating streets. The Larkshall Road frontage also has a wide grassed area with mature trees providing a buffer between the industrial buildings of the industrial estate and homes to the east."

"LANDMARKS AND NOTABLE BUILDINGS

The station is the focal point around which Highams Park has developed with its building (fig 3) dating from 1903 to a design by architect Neville Ashbee in the 'Domestic' style characteristic of the Great Eastern Railway at that time. It is a modest and well-proportioned building suffering because of its car dominated immediate surroundings, but then supported in scale by lively small-scale shop units on either side of the station frontage. The Signal Box (fig 1) is a prominent feature of the Highams Park centre which dates from 1925 and is now operating as a specialist café."

The application also makes reference to:

1. application 191304FUL by Sherry Green Homes for a 5 storey development on an adjacent site;
2. the Council's proposed Master Plan for the site; and
3. the Councils LP2 Site Allocations consultation which contains parameters for this site as designated as part of Site SA62

To deal with each in turn. It is our view that Application 191304FUL can in no way be deemed to imply support for this proposal, as it has not been approved by the Council and HPPG also objected to this application as per the attached letter (Ref: HP Planning Group: 02/16-jul-2019) outlining our objections. Some of the objections contained in that letter still stand and we request Council Planning Officers to also take these points into consideration when reviewing this application.



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With regards to the Council's proposed Master Plan we support this idea in principle, as articulated in our objection letter to the Sherry Green Homes proposal but differ from the Council in terms of the quantum and height of housing that should be delivered on the site.

We have responded to the Council's LP2 Site Allocations Consultation and have attached a copy of this letter (ref: Ref: HP Planning Group: 10/03-nov-2020); this letter also contains an attachment which outlines what we believe to be a more appropriate level of development for site SA62; so as to avoid attrition of the "market town" character of the centre of Highams Park.

We believe that this application is at variance with both the extant and emerging Local Plan in which the overriding principles are stated as seeking retain the character of the Borough's historic Town Centres.

Although Atlantis consulted with local residents on their proposals for this site, consultation was only undertaken with the community once the scheme was already almost fully designed, which meant that important policies in the Neighbourhood Plan were not taken into account. Nor were local people canvassed as to what level of development they considered appropriate for this site before the original design was conceived. This lack of pre-consultation resulted in an overwhelmingly negative response to the proposals, as reported in the consultation report. The feedback from the consultation should have prompted a major rethink, however, the changes made do not address the concerns raised by residents or the comments made by HPPG; a copy of HPPG's response is attached. A summary of the outcome of the consultation is copied below.

| | 1. Do you support the principle of this redevelopment | 2. Do you support the delivery of new homes in the community | 3. Do you support the proposals for a new entrance to Highams Park station? | 4. Do you support the design choices which have been selected for the scheme? |
|-----------|---|--|---|---|
| Yes | 113 | 422 | 218 | 18 |
| No | 575 | 266 | 465 | 671 |
| % Support | 16% | 61% | 32% | 3% |

From the above it is clear there was minimal support for the original proposal and, although people are in favour of new homes in the area they are not in favour of intense development on this site.

Whilst we appreciate that Atlantis has amended their proposal following the consultation and have reduced the maximum height of the buildings from 9 to 6 storeys. We still believe this to be too high, especially when juxtaposed against the single-story historic station building that is so key to the character of Highams Park.

The revised proposal was not put to public consultation and, it is our view based on our extensive consultations with local people over the past seven years, that this scheme would have been comprehensively rejected as it is clear that people highly value the character of the area surrounding Highams Park Station and do not want to see it dominated by an incongruous block of flats.

It is also clear from the above consultation that people are not supportive of a new station entrance, in view of this we suggest that the concept of a new station entrance is dropped in favour of further reducing the required height of the buildings on the site.



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In summary, it is our view that this proposal should be declined as it completely fails to demonstrate how it has taken into account and been informed by the local character context as articulated in Character Assessment 9 of the HP Plan. Furthermore, this proposal does not enjoy the support of local people or comply with the Council's aspirations for this site in the emerging Local Plan.

Yours sincerely,

Gordon Turpin
Chair, Highams Park Planning Group

- Attachments:**
1. Character Assessment 9 from HP Plan
 2. HPPG Letter: 02/16-jul-2019
 3. HPPG Letter: 10/03-nov-2020 – Consultation LP2
(and appendix thereto -potential sites for development)
 4. HPPG Response to Atlantis consultation – April 2020